



South Coast Air Quality Management District

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Notice of Availability of a Draft Subsequent Environmental Impact Report (Draft SEIR) for the Freeway Corridor Specific Plan Project (Proposed Project)

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to review the above-mentioned document. The City of Yucaipa is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff has provided a brief summary of the project information and prepared the following comments which are organized by topic of concern.

South Coast AQMD Staff's Summary of Project Information in the Draft SEIR

Based on the Draft SEIR, the Proposed Project consists of updating the approved Freeway Corridor Specific Plan (FCSP), which includes constructing 2,472 residential units, 1,100,761 square feet of commercial uses, and 3,992,503 square feet of business park (BP) uses on 1,242 acres. The Proposed Project also includes a project-level analysis for the buildout of the Pacific Oaks Commerce Center in planning areas BP2 and BP3 ("project area"). Pacific Oaks Commerce Center project includes Building 1 and 2. Building 1 would have 1,032,500 square feet of warehouse and 20,000 square feet of office use, for a total of 1,052,500 square feet of building space. Building 2 would have 981,500 square feet of warehouse and 20,000 square feet of office use, for a total of 1,001,500 square feet of building space. Consequently, the Pacific Oaks Commerce Center would result in development of up to 2,054,000 square feet building space. Overall buildout of the FCSP could occur over 15 to 20 years or longer. The Proposed Project is located on the southeast corner of Interstate 10 and Live Oak Canyon Road.

South Coast AQMD Staff's Comments

Feasibility of the Implemented Mitigation Measures (MMs) for Off-Road Equipment Electrification

Based on the Draft SEIR, comprehensive MMs have been outlined in Table ES-5 to address and minimize/reduce the Proposed Project's potential impacts. The MMs AQ-7 through AQ-11 mandate the electrification or hybridization of off-road equipment such as forklifts, yard trucks, and refrigeration units utilized onsite for daily warehouse and business operations. Furthermore, these measures incorporate all truck/dock bays serving cold storage facilities within the proposed

buildings and landscaping equipment like leaf blowers for property management across all new development projects. Based on the Draft SEIR, the Proposed Project Operational Health Risk Assessment Results provided in Table 5.3-19 shows a cancer risk (CR) of 156.5 in a million before applying any MMs; However, through the implementation of MMs AQ-7 through AQ-11, this risk has been significantly mitigated, with the CR reduced to 2.2 in a million (as indicated in Table 5.3-27). Consequently, the health risk impacts associated with the Proposed Project are now reduced to less than the significant cumulative threshold outlined by the South Coast Air Quality Management District (AQMD) Cumulative Threshold (5 in a million for the Proposed Project). This significant reduction in health risk impacts demonstrates the importance of adopting these MMs to ensure the surrounding community's well-being. However, applying all these MMs for all the new developments/projects under the FCSP appears to be overpromising. Failure to implement these measures for any new project or development could result in adverse health impacts.

Incompatible land use issue based on CARB and South Coast AQMD's guidance: siting warehouses (proposed BP1 to 6) within close proximity of sensitive land uses (residential areas).

South Coast AQMD staff are concerned about the potential health impacts of siting warehouses (proposed BP1 to 6) close to sensitive land uses, especially in communities already heavily affected by the existing warehouse and truck activities. Since the operation of warehouses generates and attracts heavy-duty diesel-fueled trucks that emit DPM. Based on the Draft SEIR, Figure 5.3-3, Operational Modeling-Full Buildout, the truck's route and loading docks/truck idling/TRUs are very close to residential areas. Additionally, according to the MATES V Carcinogenic Risk Interactive Map, the area surrounding the Proposed Project has an estimated cancer risk of 343 in one million.¹ When the health impacts from the Proposed Project are added to those existing impacts, residents living in the communities surrounding the Proposed Project will likely face an even greater exposure to air pollution and bear a disproportionate burden of increasing health risks. Consequently, the lead agency is recommended to follow CARB and South Coast AQMD land-use guidance to ensure that sensitive receptors are not heavily affected by the warehouse and truck activities. These guidance are: 1) The California Air Resources Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective*² is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process with additional guidance on strategies to reduce air pollution exposure near high-volume roadways available in CARB's technical advisory.³ 2) The South Coast AQMD's *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*⁴ includes suggested policies that local governments can use in their General Plans or through local planning to prevent or reduce potential air pollution impacts and protect public health. It is recommended that the Lead Agency review this Guidance Document as a tool when making local planning and land use decisions. By adhering to these essential guidance and implementing proactive MMs, the lead agency can effectively

¹ South Coast AQMD. MATES V Data Visualization Tool. Accessed at: [MATES Data Visualization \(arcgis.com\)](https://www.aqmd.gov/mates-v).

² CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* can be found at: <http://www.arb.ca.gov/ch/handbook.pdf>.

³ CARB's technical advisory can be found at: <https://www.arb.ca.gov/ch/landuse.htm>.

⁴ South Coast AQMD. 2005. *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*. Available at: <http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf>.

mitigate the adverse impacts of warehouse and truck activities on public health, ensuring that vulnerable communities are adequately protected from disproportionate exposure to air pollution.

Incorrect Pollutant Averaging Time in Health Risk Assessment (HRA)

Upon review, South Coast AQMD staff has highlighted an important discrepancy in the construction and operational Health Risk Assessment (HRA) modeling files. In the AERMOD model, a 24-hour averaging time was employed for pollutant averaging time when evaluating acute exposure.⁵ However, in accordance with the South Coast AQMD Risk Assessment Procedures v8.1 and South Coast AQMD Modeling Guidance for AERMOD,⁶ it is recommended to conduct a thorough HRA utilizing the pollutant averaging time PERIOD and 1-hour for chronic and acute exposures, respectively. Moreover, the exhausted emissions from TRU trucks when travelling onsite are not included in the HRA, which will underestimate the TRU emissions and their potential impacts on the surrounding community. Thus, the Lead Agency is recommended to: 1) re-run the construction and operational HRAs to utilize PERIOD and 1-hour averaging time to determine the health risk impacts to the sensitive receptors and off-site workers to analyze more accurate ground-level concentrations; 2) Include the TRUs truck travelling emissions in the HRA analysis; and 3) Incorporate the results and revise HRAs into the Final SEIR.

Potential Underestimation of Emissions Due to Imprecise Assumptions for Truck Trip Lengths and Trip Rates in Emissions Analysis

Appendix C - Air Quality, Energy, and GHG Modeling explains that air quality impact analysis was based on the assumption that the average daily truck trip length is 39.9 miles for class 8 truck trip distance. However, the project site is located approximately 100 miles away from the Port of Long Beach, which means that the air quality analysis underestimated the emissions from trucks traveling from the Port of Long Beach to the project site. For this reason, the Lead Agency is recommended to revise the calculations in the Final SEIR by taking a project-specific approach to the vehicle trip length and trip rates by applying more conservative trip lengths, such as designating 100 miles for Port-related trips. Tailoring these parameters and assumptions to be based on project-specific data will ensure a more accurate assessment of emissions, accounting for the unique circumstances and logistical realities of the Proposed Project.

Inconsistent Trip Generation Rates in Appendix P - Traffic Impact Analysis (TIA) and Appendix D - HRA analysis

According to Table R - POCC total trip generation summary in Appendix P - TIA, the truck trips are 934 and 891 for Building 1 and Building 2, respectively. However, based on a review of the Appendix D - HRA analysis, it appears that the trip generation rates are 112 round trips (two-way) of heavy-heavy duty trucks (HHDT) per day and 73 round trip medium-heavy duty truck (MHDT) per day for Building 1 and 266 round trip HHDT trucks per day and 328 round trip MHDT truck per day for Building 2. This information is inconsistent with the numbers provided in the traffic analysis. Staff, therefore, recommends the Lead Agency to 1) review and revise the

⁵ South Coast AQMD Risk Assessment Procedures v8.1. Access at: <http://www.aqmd.gov/docs/default-source/permitting/rule-1401-risk-assessment/riskassessproc-v8-1.pdf>

⁶ South Coast AQMD Modeling Guidance for AERMOD. Access at: [South Coast AQMD Modeling Guidance for AERMOD](#)

Proposed Project's Operational Trip Generation Rates, 2) re-calculate the emissions, and 3) include the results in the Final SEIR.

Recommended Revision to Mitigation Measures (MMs) for Operation

The air quality analysis in the Draft SEIR concludes that the Proposed Project's regional operational emissions for volatile organic compounds (VOC), nitrogen oxides (NO_x), carbon monoxide (CO), and Particulate Matter (PM) emissions would be significant. The Draft SEIR also states that the majority of the Proposed Project's VOC, NO_x, and CO operational emissions come from mobile sources. CEQA also requires that all feasible MMs that go beyond what is required by law be utilized to minimize or eliminate any significant adverse air quality impacts. Thus, to further reduce the Proposed Project's air quality impacts for operation, staff recommends that the Lead Agency consider revising its air quality (AQ) MM, in the Final SEIR to further reduce the Proposed Project's significant and unavoidable air quality impacts during operation. Stating that "the facility operator for the warehouse portion of the Project shall require tenants that do not already operate **2010** and newer trucks to apply in good faith for funding to replace/retrofit their trucks, such as Carl Moyer, VIP, Prop 1B, ..." South Coast AQMD staff recommends that the Lead Agency revise MM AQ-6 so that tenants that do not already operate **2014** and newer model year trucks are encouraged by the developer/successor-in-interest to apply in good-faith for funding for diesel truck replacements.

Emission Reductions From Health Risk Strategies

When certifying an EIR for a project retain the authority to include any additional information deemed relevant to assessing and mitigating the environmental impacts. South Coast AQMD is concerned about the potential public health impacts of siting sensitive populations within the proximity of existing air pollution sources (e.g., freeway, railroad). For this reason, prior to approving future development projects, the Lead Agency is recommended to consider the impacts of air pollutants on people who will live in a new project and provide effective mitigation. Additionally, South Coast AQMD suggests that the Lead Agency review and apply the guidance provided in: 1) the California Air Resources Board (CARB) Air Quality Land Use and Handbook: A Community Health Perspective⁷ which provides criteria for evaluating and reducing air pollution impacts associated with new projects involving land use decisions; and 2) CARB's technical advisory which contains strategies to reduce air pollution exposure near high-volume roadways.⁸

Many strategies are available for residential receptors to reduce being exposed to particulate matter, including, but not limited to, HVAC systems equipped with filters rated at a minimum efficiency reporting value (MERV) 13 or higher air filtration capabilities. In some cases, MERV 15 or better is recommended, for building design, orientation, location, vegetation barriers, landscaping screening, etc. Enhanced filtration units are capable of reducing exposure. However, enhanced filtration systems have limitations. For example, filters rated MERV 13 or higher are

⁷ California Air Resources Board (CARB), Air Quality Land Use and Handbook: A Community Health Perspective, April 2005. Available at: https://ww2.arb.ca.gov/sites/default/files/2023-05/Land%20Use%20Handbook_0.pdf

⁸ CARB's Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways. Available at: https://ww2.arb.ca.gov/sites/default/files/2017-10/rd_technical_advisory_final.pdf

able to screen out greater than or equal to 50% of DPM⁹ but they have no ability to filter out volatile organic compound (VOC) emissions. Also, in a study that South Coast AQMD conducted to investigate filters rated at MERV 13 or better in classrooms,¹⁰¹¹ a cost burden is expected to be within the range of \$120 to \$240 per year to replace each filter panel. The initial start-up cost could substantially increase if an HVAC system needs to be installed and if standalone filter units are required. Installation costs may vary, including costs for conducting site assessments and obtaining permits and approvals before filters can be installed. Other costs may include filter life monitoring, annual maintenance, and training for conducting maintenance and reporting. In addition, the filters would not have any effect unless the HVAC system is running. Therefore, when in use, the increased energy consumption from each HVAC system should be evaluated in the Draft SEIR. While the filters operate 100 percent of the time when the HVAC is in use while the residents are indoors, the environmental analysis does not generally account for the times when the residents are not using their HVAC and instead have their windows or doors open or are moving throughout the common space outdoor areas of the Proposed Project. Furthermore, when used filters are replaced with new filters, emissions associated with trucks delivering the new filters and waste disposal trucks transporting the used filters to disposal sites should be evaluated in the Draft SEIR. Therefore, any presumed effectiveness and feasibility of a particular HVAC filter should be carefully evaluated in more detail based on supporting evidence before assuming they will sufficiently alleviate exposure to DPM emissions.

Mitigation Measures for Operational Air Quality Impacts from Mobile Sources

1. Require zero-emissions (ZE) or near-zero emission (NZE) on-road haul trucks, such as heavy-duty trucks with natural gas engines that meet the CARB's adopted optional NOx emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr), if and when feasible.

Note: Given the state's clean truck rules and regulations aiming to accelerate the utilization and market penetration of ZE and NZE trucks, such as the Advanced Clean Trucks Rule and the Heavy-duty Low NOx Omnibus Regulation, ZE and NZE trucks will become increasingly more available to use.

2. Require a phase-in schedule to incentivize the use of cleaner operating trucks to reduce any significant adverse air quality impacts.

Note: South Coast AQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency.

3. At a minimum, require the use of a 2010 model year that meets CARB's 2010 engine emissions standards at 0.01 g/bhp-hr of particulate matter (PM) and 0.20 g/bhp-hr of NOx

⁹ U.S. EPA, "What is a MERV rating?" Available at: <https://www.epa.gov/indoor-air-quality-iaq/what-merv-rating>.

¹⁰ South Coast AQMD, Draft Pilot Study of High-Performance Air Filtration For Classroom Applications, October 2009. Available at: <https://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf>.

¹¹ South Coast AQMD, Draft Pilot Study of High-Performance Air Filtration For Classroom Applications, October 2009. Available at: <https://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf>.

emissions or newer, cleaner trucks. All heavy-duty haul trucks should meet CARB's lowest optional low-NOx standard starting in 2022. Where appropriate, include environmental analyses to evaluate and identify sufficient electricity and supportive infrastructures in the Energy and Utilities and Service Systems Sections in the CEQA document. Include the requirements in applicable bid documents, purchase orders, and contracts. Operators shall maintain records of all trucks associated with project construction to document that each truck used meets these emission standards and make the records available for inspection. Regular inspections should be conducted by the Lead Agency to the maximum extent feasible to ensure compliance.

4. Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the Final CEQA document. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the Proposed Project through CEQA prior to allowing this higher activity level.
5. Provide electric vehicle (EV) charging stations or, at a minimum, provide electrical infrastructure, and electrical panels should be appropriately sized. Electrical hookups should be provided for truckers to plug in any onboard auxiliary equipment.

Mitigation Measures for Operational Air Quality Impacts from Other Area Sources

1. Maximize the use of solar energy by installing solar energy arrays.
2. Use light-colored paving and roofing materials.
3. Utilize only Energy Star heating, cooling, and lighting devices and appliances.

Design Considerations for Reducing Air Quality and Health Risk Impacts

- 1) Clearly mark truck routes with trailblazer signs so that trucks will not travel next to or near sensitive land uses (e.g., residences, schools, daycare centers, etc.).
- 2) Design the Proposed Project such that truck entrances and exits are not facing sensitive receptors and trucks will not travel past sensitive land uses to enter or leave the Proposed Project site.
- 3) Design the Proposed Project such that any truck check-in point is inside the Proposed Project site to ensure no trucks are queuing outside.
- 4) Design the Proposed Project to ensure that truck traffic inside the Proposed Project site is as far away as feasible from sensitive receptors.
- 5) Restrict overnight truck parking in sensitive land uses by providing overnight truck parking inside the Proposed Project site.

Lastly, the South Coast AQMD also suggests that the Lead Agency conduct a review of the following references and incorporating additional mitigation measures as applicable to the Proposed Project in the Final SEIR:

1. State of California – Department of Justice: Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act¹²

¹² State of California – Department of Justice, Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act. Available at: <https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf>

2. South Coast AQMD 2022 Air Quality Management Plan,¹³ specifically:
 - a. Appendix IV-A – South Coast AQMD’s Stationary and Mobile Source Control Measures
 - b. Appendix IV-B – CARB’s Strategy for South Coast
 - c. Appendix IV-C – SCAG’s Regional Transportation Strategy and Control Measure
3. United States Environmental Protection Agency (U.S. EPA): Mobile Source Pollution - Environmental Justice and Transportation.¹⁴

South Coast AQMD Air Permits and Role as a Responsible Agency

If the implementation of the Proposed Project would require the use of new stationary and portable sources, including but not limited to emergency generators, fire water pumps, boilers, etc., air permits from South Coast AQMD will be required. The final CEQA document, whether a MND or EIR, should include a discussion about the potentially applicable rules that the Proposed Project needs to comply with. Those rules may include, for examples, Rule 201 – Permit to Construct,¹⁵ Rule 203 – Permit to Operate,¹⁶ Rule 401 – Visible Emissions,¹⁷ Rule 402 – Nuisance,¹⁸ Rule 403 – Fugitive Dust,¹⁹ Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,²⁰ Rule 1166 – VOC Contaminated Soil Excavation,²¹ Regulation XIII – New Source Review,²² Rule 1401 – Air Toxics,²³ Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants,²⁴ Rule 1470 – Requirements for Stationary Diesel Fueled Internal Combustion and Other Compression Ignition Engines,²⁵ and etc. It is important to note that when air permits from South Coast AQMD are required, the role of South Coast AQMD would change from a Commenting Agency to a Responsible Agency under CEQA. In addition, if South Coast AQMD is identified as a Responsible Agency, per CEQA Guidelines Sections 15086, the Lead Agency is required to consult with South Coast AQMD.

¹³ South Coast AQMD, 2022 Air Quality Management Plan (AQMP). Available at:

<http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan>

¹⁴ United States Environmental Protection Agency (U.S. EPA), Mobile Source Pollution - Environmental Justice and Transportation. Available at: <https://www.epa.gov/mobile-source-pollution/environmental-justice-and-transportation>

¹⁵ South Coast AQMD Rule 201 – Permit to Construct. Access at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>.

¹⁶ South Coast AQMD Rule 203 – Permit to Operate. Access at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>.

¹⁷ South Coast AQMD Rule 401 – Visible Emissions. Access at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf>.

¹⁸ South Coast AQMD Rule 402 – Nuisance. Access at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>.

¹⁹ South Coast AQMD Rule 403 – Fugitive Dust. Access at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf>.

²⁰ South Coast AQMD Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines. Access at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1110-2.pdf>.

²¹ South Coast AQMD Rule 1166 - VOC Contaminated Soil Excavation. Access at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>.

²² South Coast AQMD Regulation 13 – New Source Review. Access at: <https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii>.

²³ South Coast AQMD Rule 1401 – Air Toxics. Access at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf>.

²⁴ South Coast AQMD Rule 1466 - Control of Particulate Emissions from Soils with Toxic Air Contaminants. Access at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf>.

²⁵ South Coast AQMD Rule 1470 - Requirements for Stationary Diesel Fueled Internal Combustion and Other Compression Ignition Engines. Access at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf>.

CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of the process for conducting a review of the Proposed Project and issuing discretionary approvals. Moreover, it is important to note that if a Responsible Agency determines that a CEQA document is not adequate to rely upon for its discretionary approvals, the Responsible Agency must take further actions listed in CEQA Guideline Section 15096(e), which could have the effect of delaying the implementation of the Proposed Project. In its role as CEQA Responsible Agency, the South Coast AQMD is obligated to ensure that the CEQA document prepared for this Proposed Project contains a sufficient project description and analysis to be relied upon in order to issue any discretionary approvals that may be needed for air permits. South Coast AQMD is concerned that the project description and analysis in its current form in the Draft SEIR is inadequate to be relied upon for this purpose.

For these reasons, the final CEQA document should be revised to include a discussion about any and all new stationary and portable equipment requiring South Coast AQMD air permits, provide the evaluation of their air quality and greenhouse gas impacts, and identify South Coast AQMD as a Responsible Agency for the Proposed Project as this information will be relied upon as the basis for the permit conditions and emission limits for the air permit(s). Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions regarding what types of equipment would require air permits. For more general information on permits, please visit South Coast AQMD's webpage at <http://www.aqmd.gov/home/permits>.

Conclusion

As set forth in California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), the Lead Agency shall evaluate comments from public agencies on the environmental issues and prepare a written response at least 10 days prior to certifying the Final EIR. As such, please provide South Coast AQMD written responses to all comments contained herein at least 10 days prior to the certification of the Final EIR. In addition, as provided by CEQA Guidelines Section 15088(c), if the Lead Agency's position is at variance with recommendations provided in this comment letter, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided.

Thank you for the opportunity to provide comments. South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Sahar Ghadimi, Air Quality Specialist, at sghadimi@aqmd.gov should you have any questions.

Sincerely,

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