



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:

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RKennedy@riversideca.gov

Regine Kennedy, Senior Planner
City of Riverside, Planning Division
3900 Main Street, 3rd Floor
Riverside, CA 92522

Mitigated Negative Declaration (MND) for the Palmyrita Avenue Warehouse Project – PR-2022-001409 (Proposed Project)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The City of Riverside is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. The following comments include information about South Coast AQMD permits, recommended revisions to operational air quality impact analysis related to manufacturing land uses, and request for clarification on the use of railroad spurs during operation of the Proposed Project that the Lead Agency should include in the Final MND.

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

Based on the MND, the Proposed Project consists of construction and operation on 13.60 acres of either Scenario 1: two buildings with a combined total of up to 249,960 square feet^{1, 2, 3} for non-cold storage⁴ warehouse uses or Scenario 2: two buildings consisting of a combined total of 177,331 square feet⁵ for non-cold storage⁶ warehouse uses and 61,111 square feet for manufacturing uses.⁷ For either scenario, the Proposed Project will have a total of 33 loading dock doors.⁸ Scenario 1 is expected to involve 114 net new truck trips per day while Scenario 2 is expected to involve 90 net new truck trips per day.⁹ The Proposed Project site is located near the northeast corner of Iowa Ave and Palmyrita Ave in the City of Riverside in Riverside County.¹⁰ Construction is anticipated to begin in November of 2023, occur in a single phase, and last approximately 10 months.¹¹ Operation is expected to begin in the third quarter of 2024.¹² Based on a review of aerial photographs, South Coast AQMD staff found that the nearest sensitive receptor (a private residence) is within approximately 730 feet northeast of the Proposed Project property line.

¹ MND. PDF Pages 1 through 2 of 106 (132,667 sq ft + 116,691 sq ft = **249,358** sq ft).

² *Ibid.* Appendix A: Air Quality, Greenhouse Gas Emissions, and Energy Supporting Information. PDF Pages 11 through 12 of 596 (132,167 sq ft + 116,691 sq ft = **248,858** sq ft).

³ *Ibid.* Appendix A. PDF Page 130 of 596 (249.96 * 1000 sq ft = **249,960** sq ft).

⁴ *Ibid.* Appendix A. PDF Page 14 of 596.

⁵ *Ibid.* Page 2 of 106 (88,736 sq ft + 88,595 sq ft = 177,331 sq ft of warehouse uses).

⁶ *Ibid.* Appendix A. PDF Page 14 of 106.

⁷ *Ibid.* Page 2 of 106 (30,579 sq ft + 30,532 sq ft = 61,111 sq ft of manufacturing uses).

⁸ *Ibid.* PDF Pages 13, 15 & 68 of 106 (Building 1 with 18 dock doors and Building 2 with 15 dock doors).

⁹ *Ibid.* PDF Pages 80 through 82 of 106.

¹⁰ *Ibid.* PDF Page 1 of 106.

¹¹ *Ibid.* Appendix A. PDF Pages 236 through 237 of 596.

¹² *Ibid.* Appendix A. PDF Page 80 of 596.

South Coast AQMD Staff's Comments*South Coast AQMD Permits and Responsible Agency*

If implementation of the Proposed Project would require the use of stationary equipment, including but not limited to the 250-horsepower emergency fire pump mentioned in the MND,¹³ permits from South Coast AQMD are required. The Final MND should include a discussion on stationary equipment that will require South Coast AQMD permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project. Any assumptions used in the Final MND will be used as the basis for permit conditions and limits for the Proposed Project. Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions on permits. For more general information on permits, please visit South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>.

Additional Emissions from Permitted and Non-Permitted Sources from Manufacturing Uses during Operation

For Scenario 2, the Proposed Project is expected to consist of 61,111 square feet of manufacturing uses.^{14, 15} The associated operational emission estimates in the MND include emissions from mobile sources, area sources, energy sources, and one stationary source (the aforementioned fire pump),¹⁶ but do not include potential emissions from additional permitted and non-permitted stationary sources that may result from the manufacturing activities in Scenario 2 (e.g. emergency diesel generators, boilers, combustion or non-combustion industrial equipment, etc.). South Coast AQMD staff therefore recommends the Lead Agency 1) re-evaluate additional reasonable and foreseeable operational emission sources from manufacturing activities; 2) calculate and include those additional emissions in the total operational emissions and revise the air quality regional and localized operational impacts to reflect these changes; and 3) make the appropriate CEQA significant determinations in the Final MND.

If a revised estimate of emissions from manufacturing operational activities is excluded from the Final MND, the Lead Agency should provide reasons supported by substantial evidence in the record to explain why. If manufacturing activities have not been fully developed or approved prior to adoption of the Final MND, the Lead Agency should commit to evaluating the air quality impacts from manufacturing activities through a CEQA process when specific manufacturing information becomes known.

Emissions from Railroad Spur Use during Operation

Three railroad spurs are currently present on the Proposed Project site that historically were utilized by facilities located on the site.^{17,18} The Lead Agency's air quality impact analysis for the

¹³ MND. Appendix A: Air Quality, Greenhouse Gas Emissions, and Energy Supporting Information. PDF Pages 88, 113, & 131 of 596.

¹⁴ *Ibid.* Page 2 of 106.

¹⁵ *Ibid.* Appendix A. PDF Page 130 of 596.

¹⁶ *Ibid.* Appendix A. PDF Pages 85 through 88, & Pages 94 through 95 of 596.

¹⁷ *Ibid.* Page 58 of 106.

Proposed Project in Appendix A does not calculate emissions related to operational rail activities, as evident by selection of the CalEEMod Land Use Subtype of *Unrefrigerated Warehouse -No Rail*. Use, or lack of, of the railroad tracks or spurs are not discussed in the MND. Staff, therefore, recommends that if the Proposed Project will not utilize the railroad spurs during the operational phase, then this should be clearly stated or briefly discussed in the Final MND.

If the Proposed Project will utilize the railroad spurs during its operational phase, South Coast AQMD staff recommends that the Lead Agency quantify the mass emissions from such rail activities and estimate the associated air quality and health risk impacts in the Final MND.¹⁹ This will ensure that the Proposed Project's operational air quality impacts from all future activities that are reasonably foreseeable at the time of the release of the Final MND are properly analyzed. Alternatively, if emissions from rail activities are not included in the Final MND, the Lead Agency should provide reasons supported by substantial evidence in the record to explain why.

Conclusion

According to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When the Lead Agency's position is at variance with recommendations raised in the comments, the issues raised in the comments should be addressed in detail, giving reasons why specific comments and suggestions are not accepted. There should be good faith and reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision-makers and the public who are interested in the Proposed Project.

We appreciate the opportunity to review the Proposed Project. Thank you for considering these 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 Evelyn Aguilar, Air Quality Specialist, at eaguilar@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

Sam Wang
Program Supervisor, CEQA IGR
Planning, Rule Development & Implementation

SW:EA
RVC230622-02
Control Number

¹⁸ MND. Appendix E: Hazards and Hazardous Materials Supporting Information. PDF Pages 48 through 50 & 586 of 682.

¹⁹ South Coast AQMD Modeling Guidance for AERMOD. Accessed at: <http://www.aqmd.gov/home/air-quality/meteorological-data/modeling-guidance#Receptor>.