



South Coast Air Quality Management District

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Notice of Availability of a Recirculated Draft Environmental Impact Report (EIR) for Rubidoux Commerce Park Project (Proposed Project) (SCH No. 2020110449)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to review the above-mentioned document. The City of Jurupa Valley 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 Recirculated Draft EIR

Based on the Recirculated Draft EIR, the Proposed Project is comprised of the development of the 80.8-acre property with five industrial buildings ("Building 1," "Building 2," "Building 3," "Building 4," and "Building 5") totaling 1,118,102 square feet (s.f.). Building 1 would include 309,870 s.f. of building area, Building 2 would include 388,222 s.f. of building area, Building 3 would include 174,364 s.f. of building area, Building 4 would include 275,958 s.f. of building area, and Building 5 would include 35,688 s.f. of building area. The Recirculated Draft EIR states that although the future tenant(s) of the building is not known, industrial uses would allow for high-cube fulfillment, manufacturing, and general light industrial services.¹ Based on a review of aerial photographs, South Coast AQMD staff found that the nearest sensitive receptor (residential development) is located adjacent to the Proposed Project site, approximately 240 feet southeast of the Proposed Project. Construction of the Proposed Project is anticipated to occur in a single phase, commence in January 2023, and be completed in June 2024.² The Proposed Project is located on the southeast corner of Montana Avenue and 25th Street.³

South Coast AQMD Staff's Comments

The CalEEMod Land Use(s) Subtype Assumptions (Combining Manufacturing and General Light Industrial) in the Appendix B- Air Quality Impact Analysis May Have Underestimated the Worst-Case Operational Air Quality Impacts

In accordance with the project description outlined in the Recirculated Draft EIR, the construction of five industrial buildings totaling 1,194,170 square feet is proposed on 80.8 acres

¹ Recirculated Draft EIR Page 26.

² Appendix B, Air Quality Impact Analysis. Page 146.

³ Recirculated Draft EIR Page 26.

of land. It is important to note that the document does not currently specify the future tenants for these five buildings.⁴ However, based on the footnote in Appendix B- Air Quality Impact Analysis of the Recirculated Draft EIR, the analysis assumes that the project site will be divided into two equal parts for analytical purposes. Specifically, half of the site, totaling 597,085 square feet, is designated for manufacturing land uses, while the remaining half, also 597,085 square feet, is allocated for general light industrial land uses.⁵

According to the CalEEMod User Guide - Version 2022.1, it explicitly states the characteristics of “Light Industrial Land Use Subtype: *“Light industrial use facilities are free-standing facilities devoted to a single use, the facilities that have an emphasis on activities other than manufacturing and typically have minimal office space. Typical light industrial activities include printing, material testing, and assembly of data processing equipment. This land use subtype must be less than 50,000 square feet”*.”⁶ Therefore, the allocation of 597,085 square feet for this purpose contradicts the guidelines provided in the CalEEMod User Guide. Moreover, the general light industrial activities are expected to generate less emissions and involve fewer total daily truck trips⁷ compared to the manufacturing or other industrial land uses. The current assumption has led to an underestimation of emissions. South Coast AQMD staff recommends that the Lead Agency conduct a more conservative analysis using the “worst-case” scenario in CalEEMod modeling and correct the land use sub-type used in CalEEMod to ensure accuracy and compliance with guidelines.

Potential Underestimation of Emissions Due to Inaccurate On-site Distance for the Trucks and Passenger Vehicles During Project Operation

The Recirculated Draft EIR notes that CalEEMod Version 2022 lacks the capacity to distinguish between On-site and Off-site emissions during operation. Consequently, the analysis relies on the assumption that 0.5 mile is the maximum allowable On-site distance for both trucks and passenger vehicles. However, the aerial map of the On-site vehicle route (truck movements) as identified in Exhibit 2-B in Appendix C of the Recirculated Draft EIR indicates that the actual On-site distance of the route exceed 0.7 mile, which is greater than the 0.5-mile assumption upon which the emission estimates are based. Therefore, the On-site emissions appear to have been underestimated. For this reason, T the Lead Agency is recommended to either revise the calculations to reflect an On-site route distance of 0.7 mile or provide a comprehensive explanation and justification of the methodology employed in relying on the 0.5-mile On-site assumption parameter.

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

Appendix B of the Recirculated Draft EIR, explains that air quality impact analysis was based on the assumption that the average truck trip length is 30.34 miles for general light industrial and manufacturing uses. However, the project site is located 70 to 80 miles away from the Ports of Los Angeles and Long Beach which means that the air quality analysis underestimated the

⁴ Recirculated Draft EIR Page 26.

⁵ Appendix B, Air Quality Impact Analysis. Page 14 in PDF.

⁶ *[CalEEMod User Guide - Version 2022.1](#).

⁷ Appendix Q, VMT Analysis. Page 12.

emissions from trucks traveling from the Ports to the project site. For this reason, the Lead Agency is recommended to revise the calculations in the Final EIR by taking a project-specific approach to the vehicle trip length and trip rates by applying more conservative trip lengths such as designating 40 miles for local trips and 80 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.

Warehouse Cold Storage Land Use and the Associated Emissions from Transport Refrigeration Units (TRU)

The project description in the Recirculated Draft EIR does not explain whether the Proposed Project intends to allocate a portion of the warehouse land use for cold storage. Cold storage warehouses utilize more trucks and trailers equipped with TRUs than warehouses without cold storage. As a result, the Lead Agency is recommended to revise the project description in the Final EIR to explain whether cold storage would be a part of the Proposed Project and provide an estimate for the number of TRU trucks and trailers associated with the operation of the warehouses with cold storage. If there are potential uses for TRUs, the Lead Agency is recommended to revise the calculations in the Final EIR to quantify the emissions from the TRUs in addition to the operational truck emissions.

Incorrect Pollutant Averaging Time and Underestimation of Ground-Level Pollutants Near Buildings in Health Risk Assessment (HRA),

South Coast AQMD staff's review of the construction and operational HRA modeling files noted that the ANNUAL⁸ keyword was selected for the pollutant averaging time in the control pathway in the AERMOD model. However, according to the South Coast AQMD Risk Assessment Procedures v8.1 and South Coast AQMD Modeling Guidance for AERMOD,⁹ a detailed HRA utilizing AERMOD should be run using the pollutant averaging time PERIOD and 1-hour.

In addition, South Coast AQMD staff's review of the modeling files noted that industrial buildings were not included in the building downwash option in the AERMOD dispersion model during operation which resulted in an underestimation of the ground-level pollutant concentrations near the buildings.

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 and include the industrial buildings in the building downwash to analyze more accurate ground-level concentrations; and 2) include the results in the Final EIR.

Inconsistent Emission Rates (lb/day) Calculated from CalEEMod vs. AERMOD

⁸ 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>

⁹ South Coast AQMD Modeling Guidance for AERMOD. Access at: [South Coast AQMD Modeling Guidance for AERMOD](#)

South Coast AQMD staff's review of the AERMOD files noted that the diesel particulate matter (DPM) emission rates do not match the data reported in Table 13: Localized Significant Summary of Operations (Onsite Emissions) in Appendix B of the Recirculated Draft EIR which were estimated using CalEEMod. For example, the operational PM10 emission rates presented in Table 13 d are 0.88 pounds per day (lb/day) but the PM10 emissions calculated via AERMOD modeling (including Idling and Onsite emissions) are 0.014 lb/day. This lack of continuity in the emission estimates raises questions about the accuracy of the calculations and warrants a more comprehensive and careful examination of the underlying factors and route causes contributing to this disparity. The Lead Agency is recommended to re-review these calculations and update the Final EIR accordingly with the appropriate corrections.

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, spray booths, and etc., air permits from South Coast AQMD will be required and 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. In addition, 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 evaluating the applications for air permits. For these reasons, the Final EIR should include a discussion about any new stationary and portable equipment requiring South Coast AQMD air permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project.

The Final EIR should also include calculations and analyses for construction and operation emissions for the new stationary and portable sources, as this information will also 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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BR:SW:SG

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