



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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Final Environmental Impact Report (FEIR) for the Rubidoux Commerce Park Project (Proposed Project)

The South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to review and comment on the above-mentioned document. We have previously commented on the Recirculated Draft Environmental Impact Report (EIR) document.¹ The following comment is meant to guide the lead agency and it should be incorporated into the Final CEQA document.

The South Coast AQMD staff has reviewed the responses to comments on the Final EIR. While appreciating the efforts, specific answers from the lead agency could benefit from more detailed and comprehensive explanations. Specifically, the staff has highlighted concerns in comment number 1 in the previous comment letter about the CalEEMod Land Use(s) Subtype assumptions. Where the combination of Manufacturing (597,085 square feet) and General Light Industrial (597,085 square feet) in Appendix B- Air Quality Impact Analysis deviates from the CalEEMod User Guide.

The lead agency has replied that “the “Light Industry” or “Heavy Industry” label is simply a name used within the model to signify the land use and is not treated substantively different than the “Manufacturing” land use in CalEEMod.” While the lead agency correctly emphasizes uniform operational energy CalEEMod defaults across all land uses, the South Coast AQMD staff wants to emphasize that these certain crucial factors do impact the emission calculations—such as trips per day—differ significantly between the two land uses (for example, trips/day). Therefore, South Coast AQMD staff recommends that the Lead Agency revise the air quality analysis section in the FEIR.

¹ <http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2023/october-2023/RVC230901-01.pdf>.

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday
Manufacturing	2,568	890	591	746,726	1,284	445	296
General Heavy Industry	2,760	412	2,985	896,722	1,380	206	1,493
Other Non-Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00
User Defined Industrial	422	13.1	4.78	110,955	211	6.57	2.39

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,

Sam Wang

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