



# South Coast Air Quality Management District

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

SENT VIA E-MAIL:

March 29, 2023

[bfoote@cityofredlands.org](mailto:bfoote@cityofredlands.org)

Brian Foote, City Planner  
City of Redlands, Planning Division  
35 Cajon St, Suite 20  
Redlands, California 92373

## **Mitigated Negative Declaration (MND) for the Proposed LBA Redlands Warehouse Building (Proposed Project) Commission Review and Approval No. 938 (CRA No. 938)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The City of Redlands is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. The following comments recommended revisions to the localized CEQA air quality impact analysis during construction and operation, health risk assessment analysis, fleet mix in California Emissions Estimator Model analysis, South Coast AQMD Rule 2305 and 316, and information about South Coast AQMD permits and responsible agency 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 Lead Agency proposes developing a 181,100 square-foot non-refrigerated light industrial warehouse building on a 9.44-gross-acre site,<sup>1</sup> with 4,000 square feet of the mezzanine total of 185,100 square feet. The Proposed Project would include 27 dock doors<sup>2</sup> associated with 100 truck trips per day<sup>3</sup> and truck access via the two driveways along Iowa Street.<sup>4</sup> The Proposed Project is located at 350 Iowa Street in the City of Redlands.<sup>5</sup> Based on the aerial photographs, South Coast AQMD staff found that the nearest sensitive receptor (e.g., residences) is within 400 feet southwest of the Proposed Project boundaries. The Proposed Project's construction is anticipated to occur in one phase, beginning in summer 2023, and last approximately ten months.<sup>6</sup>

### South Coast AQMD Staff's Comments on the MND

#### *Localized CEQA Air Quality Impacts Analysis during Construction and Operation*

Under the Air Quality section of the MND, the Lead Agency estimates the Proposed Project's regional construction and operational emissions utilizing the California Emissions Estimator

---

<sup>1</sup> MND. Page 1.

<sup>2</sup> *Ibid.*

<sup>3</sup> *Ibid.* Page 18.

<sup>4</sup> *Ibid.* Page 2.

<sup>5</sup> *Ibid.* Page 1.

<sup>6</sup> *Ibid.* Page 3.

Model (CalEEMod) version 2020.4.0<sup>7</sup> and presents the emissions results in Table 2 and Table 3 of the MND.<sup>8</sup> However, the localized air quality impacts analysis is not conducted in the MND. Therefore, South Coast AQMD staff recommend that the Lead Agency revise the air quality impacts analysis to include the localized emissions during construction and operation, compare the results to the South Coast AQMD CEQA localized significance thresholds,<sup>9</sup> determine the level of significance, and include the revision in the Final MND. If the revision is not included in the Final MND, the Lead Agency should provide reasons for not having them supported by substantial evidence in the record.

### *Health Risk Assessment (HRA) Analysis*

#### Averaging Time Utilized in Operational HRA Analysis

Based on the operational HRA output files in Appendix A – Air Quality, Greenhouse Gas, and Health Risk Assessment Technical Study, the averaging time for the analysis is 1, 8, 24 ANNUAL.<sup>10</sup> However, according to the South Coast AQMD Risk Assessment Procedures v8.1, the detailed HRA utilizing AERMOD should be run using the averaging time PERIOD and 1-hour.<sup>11</sup> Since the operational HRAs of the Proposed Project using ANNUAL, South Coast AQMD staff recommend that the Lead Agency re-run the operational HRAs utilizing PERIOD and 1-hour averaging time to determine the health risk impacts to the sensitive receptors and off-site workers and include the revised results in the Final MND. If the revision is not included in the Final MND, the Lead Agency should provide reasons for not having them supported by substantial evidence in the record.

#### Building Downwash Option in Operational HRA Modeling

Based on the modeling files, South Coast AQMD staff is able to verify that the building downwash option is not selected in the operational HRA. The ground-level pollutant concentrations near the building would be underestimated if the downwash effects were absent in the dispersion modeling. Therefore, building downwash should be considered for the Proposed Project operation to predict more accurate ground-level concentrations.

In addition, the truck idling emissions would need to be estimated separately and included in the dispersion modeling analysis and HRA as point sources. However, all the sources from the modeling files are modeled as volume sources. In addition, it needs to be clarified in the MND if the stationary combustion engines (e.g., diesel firewater pump, diesel emergency generator, etc.) will be used on-site during operation. If any of these will be used when implementing the Proposed Project, they will need to be added as additional sources to the HRA and dispersion modeling files. Therefore, South Coast AQMD staff recommend that the Lead Agency revise the operational HRA modeling by incorporating the above recommendations and including the HRA results in the Final MND. If the HRA modeling is not revised and included in the Final MND, the Lead Agency should

---

<sup>7</sup> *Ibid.* Page 17.

<sup>8</sup> *Ibid.* Page 18.

<sup>9</sup> South Coast AQMD Localized Significance Thresholds. Access at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>

<sup>10</sup> *Ibid.* Appendix A – Air Quality, Greenhouse Gas, and Health Risk Assessment Technical Study. Page 81 of PDF.

<sup>11</sup> 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>

provide reasons supported by substantial evidence in the record to explain why the revision is not included.

Urban Option Selection

Based on the modeling files, South Coast AQMD staff finds that the urban dispersion option is selected as *rural*. However, according to the South Coast AQMD Modeling Guidance for AERMOD, AERMOD should be executed using the urban modeling option, which is South Coast AQMD policy for all air quality impact analyses in its jurisdiction.<sup>12</sup> Hence, South Coast AQMD staff recommends that the Lead Agency review the modeling guidance, revise the modeling files with the correct option, and include the results in the Final MND. If the revision is not included in the Final MND, the Lead Agency should provide reasons supported by substantial evidence in the record to explain why the revision is not included.

*Fleet Mix in California Emissions Estimator Model (CalEEMod) Analysis*

Based on Table 4-3: Proposed Project Trip Generation Summary (PCE) in Appendix G – Traffic Analysis,<sup>13</sup> South Coast AQMD staff is able to calculate the fleet mix, find the below information, and compare it to the fleet mix in CalEEMod in Appendix A.

**Table A  
Fleet Mix Calculation Based on Proposed Project Trip Generation Summary (PCE)  
Compared to Fleet Mix in CalEEMod**

Land Use	Vehicle Type	Fleet Mix in CalEEMod <sup>14</sup>	South Coast AQMD Staff's Calculations <sup>15</sup>
<b>General Light Industrial</b>	Passenger (LDA, LDT1, LDT2, MDV, MCY)	0.93156	0.878
	2-axle	0.007009	0.010
	3-axle	0.011926	0.020
	4+-axle	0.017481	0.092
<b>Warehousing</b>	Passenger (LDA, LDT1, LDT2, MDV, MCY)	0.93156	0.418
	2-axle	0.007009	0.056
	3-axle	0.011926	0.097
	4+-axle	0.017481	0.429

From the CalEEMod output files, it seems like the fleet mix is default generated, and the fleet mix values are the same for both general light industrial, warehousing, and parking lot land use types.

<sup>12</sup> South Coast AQMD Modeling Guidance for AERMOD. Access at: <http://www.aqmd.gov/home/air-quality/meteorological-data/modeling-guidance>

<sup>13</sup> *Ibid.* Appendix G – Traffic Analysis. Page 36.

<sup>14</sup> *Ibid.* Appendix A. Page 56 of PDF.

<sup>15</sup> Calculations are based on the Project Trip Generation Summary (PCE) in Appendix G. Page 36.

However, with the fleet mix values calculated by the South Coast AQMD staff, it is recommended that the Lead Agency provides an explanation of how the fleet mix is used in the analysis (e.g., default values; if not, how are those values calculated, etc.), why it does not match with the fleet mix calculated based on trip generation, review and revise the analysis as needed and include the explanation and/or revision in the Final MND. If the explanation and/or revision is not included in the Final MND, the Lead Agency should provide reasons supported by substantial evidence in the record.

### *South Coast AQMD Rule 2305 and Rule 316*

On May 7, 2021, South Coast AQMD's Governing Board adopted Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program,<sup>16</sup> and Rule 316 – Fees for Rule 2305.<sup>17</sup> Rule 2305 is a new rule that will reduce regional and local emissions of nitrogen oxides (NOx) and particulate matter (PM), including diesel PM, associated with warehouses and mobile sources attracted to warehouse activities. Also, the emission reductions will help the region attain federal and state ambient air quality standards.

Rule 2305 applies to owners and operators of warehouses greater than or equal to 100,000 square feet. Operators are subject to an annual WAIRE Points Compliance Obligation calculated based on the annual number of truck trips to the warehouse under Rule 2305. WAIRE Points can be earned by implementing actions in a prescribed menu in Rule 2305, implementing a site-specific custom plan, or paying a mitigation fee. Warehouse owners are only required to submit limited information reports. Still, they can opt-in to earn Points on their tenants' behalf because certain actions to reduce emissions may be better achieved during the warehouse development phase, such as installing solar and charging infrastructure. Rule 316 is a companion fee rule for Rule 2305, allowing South Coast AQMD to recover costs associated with Rule 2305 compliance activities. Since the Proposed Project consists of developing one 181,100-square-foot industrial warehouse building (185,100 square feet with 4,000 square feet of mezzanine), the Proposed Project's warehouse owners and operators will be required to comply with Rule 2305 once the warehouse is occupied. Therefore, South Coast AQMD staff recommends that the Lead Agency review South Coast AQMD Rule 2305 to determine the potential WAIRE Points Compliance Obligation for future operators and explore whether additional project requirements and CEQA mitigation measures can be identified and implemented at the Proposed Project that may help future warehouse operators meet their compliance obligation. South Coast AQMD staff is available to answer questions concerning Rule 2305 implementation and compliance by phone or email at (909) 396-3140 or [waireprogram@aqmd.gov](mailto:waireprogram@aqmd.gov). For implementation guidance documents and compliance and reporting tools, please visit South Coast AQMD's WAIRE Program webpage.<sup>18</sup>

### *South Coast AQMD Permits and Responsible Agency*

If the implementation of the Proposed Project would require the use of new stationary equipment, including but not limited to emergency generators, fire water pumps, boilers, etc., permits from

---

<sup>16</sup> South Coast AQMD Rule 2305 - Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program. Access at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xxiii/r2305.pdf>.

<sup>17</sup> South Coast AQMD Rule 316 – Fees for Rule 2305. Access at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-iii/r316.pdf>

<sup>18</sup> South Coast AQMD. WAIRE Program. Accessed at: <http://www.aqmd.gov/waire>.

South Coast AQMD are required. The Final MND should include a discussion on stationary equipment requiring South Coast AQMD permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project. Any assumptions used for the stationary sources in the Final MND will also be used as the basis for the 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>.

#### Conclusion

Pursuant 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 responding to issues raised in the comments, responses should provide sufficient details giving reasons why specific comments and suggestions are not accepted. There should be good faith, 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.

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 Danica Nguyen, Air Quality Specialist, at [dnguyen1@aqmd.gov](mailto:dnguyen1@aqmd.gov) should you have any questions.

Sincerely,

*Sam Wang*

Sam Wang

Program Supervisor, CEQA-IGR

Planning, Rule Development & Implementation

SW:DN

SCB230308-05

Control Number