Appendix C-4

UXR Responses to Comments – AQ/HRA/GHG

MEMORANDUM

URBAN | CROSSROADS

DATE: May 16, 2024
TO: Nicole N. Cobleigh, Dudek
FROM: Urban Crossroads
JOB NO: 14064-01 RTC

WEST CAMPUS UPPER PLATEAU RESPONSE TO COMMENTS

Urban Crossroads, Inc. is pleased to submit the following Response to Comments on the Draft Environmental Impact Report for the West Campus Upper Plateau (Project), which is generally located south of Alessandro Boulevard and west of Brown Avenue within the jurisdiction of the March Joint Powers Authority (March JPA) in Riverside County. The Air Quality Impact Analysis (AQIA) and Health Risk Assessment (HRA) were revised to address issues raised through the public comment process. Subsequent to the submittal of these public comments, March JPA determined to recirculate Section 4.2, Air Quality, of the EIR, along with the Project AQIA and HRA. Further public comments were received regarding air quality and health risks on the Recirculated Draft EIR and are responded to separately. Additional minor revisions have been made to the Project AQIA and HRA. For purposes of these responses to comments, citations to the EIR, Project AQIA, and Project HRA refer to the Final EIR, and Project AQIA (Appendix C-1) and Project HRA (Appendix C-2) of the Final EIR.

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT LETTER A-8

COMMENT A-8.3

Averaging Time Utilized in Construction and Operational HRA Analysis

Based on the construction and operational HRA output files, the averaging time for the analysis is ANNUAL. 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. Since the construction and operational HRAs of the Proposed Project using ANNUAL, South Coast AQMD staff recommend that the Lead Agency re-run the construction and 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 EIR. If the revision is not included in the Final EIR, the Lead Agency should provide reasons for not having them supported by substantial evidence in the record.

RESPONSE A-8.3

The comment states that the analysis should have been run in AERMOD utilizing the PERIOD and 1-Hour averaging time options as opposed to the ANNUAL averaging time option. It should be noted that the PERIOD and ANNUAL options return identical results. The PERIOD averaging time option averages pollutant concentrations over the entire

period of meteorological data, whereas the ANNUAL averaging time option averages pollutant concentrations over one year. However, per the AERMOD user guide, when multi-year meteorological data sets are used, the ANNUAL option outputs the average of the ANNUAL values across the years of data processed. Since the meteorological data set used for this Project includes five years of data, when the ANNUAL option is selected, the model outputs the average concentration for the entire data set, the same as would be output using the PERIOD option. In response to this comment, the model was re-run for both construction and operational health risks utilizing the PERIOD averaging time.

option, which resulted in identical pollutant concentrations as the previous output which had utilized the ANNUAL averaging time option. The revised model outputs provided in the errata section of the FEIR demonstrate that the PERIOD and ANNUAL averaging time options result in identical pollutant concentrations.

Additionally, the 1-Hour averaging time option is not required since there are no 1-hour acute standards associated with diesel particulate matter (DPM) and providing a 1-hour concentration would not produce meaningful information that could be compared against any adopted standard or threshold (since none exists for a 1-hour DPM concentration). As such, since the only toxic air contaminant (TAC) emitted by the proposed Project is DPM, which does not have an acute REL (meaning there are no expected acute health impacts), the 1 hour averaging time option is not necessary for acute cancer health risks associated with TAC emissions from diesel particulate matter.

COMMENT A-8.4

Building Downwash Option in Operational HRA

Based on the South Coast AQMD staff review, the HRA modeling file does not include the building downwash option 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 in order 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, the operational HRA modeling file indicates those emissions as line volume source types. Thus, truck idling emissions should be modeled as point sources with a building downwash option selected. In addition, it needs to be clarified in the Draft EIR 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 EIR. If the HRA modeling is not revised and included in the Final EIR, the Lead Agency should provide reasons supported by substantial evidence in the record to explain why the revision is not included.

RESPONSE A-8.4

Building Downwash

The comment states that the analysis should have been performed utilizing the building downwash option in order to account for any impacts buildings may have on ground level

concentrations, and that pollutant concentrations near the building may be underestimated without inclusion of building downwash in the modeling. It should be noted that per the AERMOD Users Guide, the building downwash algorithms do not apply to volume sources (including line volume sources). Furthermore, consistent with the SCAQMD's Risk Assessment Procedures Version 8.1 Appendix X (page X-3), the building downwash algorithm only applies to point sources and does not affect volume sources: "The building downwash algorithms only affect point sources and do not affect volume or area sources." The Project's DPM emissions come from trucks and as explained below, are properly modeled as line volume sources. Therefore, the building downwash algorithms do not apply and the inclusion of building downwash in the analysis would not impact ground level concentrations, or pollutant concentrations near the buildings.

Additionally, the comment states that truck idling emissions should be modeled using point sources rather than line volume sources. The use of the volume source algorithm in AERMOD to represent truck idling, instead of the point source algorithm, is justified based on several factors:

1. Nature of Emissions: Truck idling emissions are characterized by a diffused and dispersed emission pattern rather than a concentrated point source. Idling emissions occur over a larger area, typically surrounding the truck, rather than originating from a single point. The volume source algorithm is better suited to represent such diffuse emissions as it distributes the emissions over a specified volume, resulting in a more realistic representation.
2. Dispersion Characteristics: The dispersion characteristics of idling emissions are different from those of point source emissions. Point sources generally have a well-defined and predictable plume behavior, whereas idling emissions tend to disperse more quickly and unevenly due to factors like wind conditions, vehicle movements, and local topography. The volume source algorithm accounts for the dispersion of emissions in a more accurate and realistic manner, considering the complex interactions with the surrounding environment.
3. Modeling Accuracy: The volume source algorithm provides more accurate modeling results for truck idling emissions compared to the point source algorithm. By distributing emissions across a volume, it allows for better representation of the spatial distribution and concentration of pollutants. This increased accuracy is particularly important when assessing the impact of idling emissions on air quality in areas with complex geometries or near sensitive receptors.

It is important to note that the choice between the volume source algorithm and the point source algorithm is based on the specific characteristics of the emission source and the modeling objectives. In some cases, such as for point sources with well-defined plumes (such as smoke stacks), the point source algorithm may be more appropriate. However, for representing truck idling emissions like those associated with this Project, the volume source algorithm is a better option due to its ability to capture the diffuse and dispersed nature of these emissions.

Emergency Generators/Fire Pumps

No stationary combustion engines such as emergency generators or fire pumps are proposed as part of the Project. Mitigation Measure AQ-24 has been added to the EIR:

> MM-AQ-24: Through requirements in the lease agreements or purchase and sale agreement, upon occupancy, tenants shall not use diesel back-up generators, unless absolutely necessary. Tenant shall provide documentation demonstrating, to March JPA's satisfaction, that no other back-up energy source(s) are available and sufficient for the building's needs. If absolutely necessary, at the time of initial operation, generators shall have Best Available Control Technology (BACT) that meets CARB's Tier 4 emission standards or meets the most stringent in-use standard, whichever has the least emissions. In the event rental back-up generators are required during an emergency, the units shall be located at the project site for only the minimum time required. Tenants shall make every effort to utilize rental emergency backup generators that meet CARB's Tier 4 emission standards or have the least emissions.

For analysis purposes, however, the Project AQIA and Project HRA, conservatively assumed the installation of nineteen 300-horsepower diesel-powered generators, operating up to one hour per day, one day per week, for up to 50 hours per year for maintenance and testing purposes. Under mitigated conditions, the Project was assumed to utilize Tier 4 generators.

South Coast AQMD staff reviewed the recirculated Project AQIA and Project HRA and did not provide further comment on this issue in its letter dated February 23, 2024.

COMMENT A-8.5

User-Defined Land Use Subtype and Truck Fleet Mix

In the operational CalEEMod output files, besides the "unrefrigerated warehouse-no rail" and "refrigerated warehouse-no rail" land use types, "user-defined industrial" is added. According to the CalEEMod User Guide, the "user-defined" may be selected to characterize project land use subtypes that are not included in CalEEMod. If selected, all data on the Land Use screen will need to be input manually. However, the size metric, lot acreage, and the floor square area use are all set to zero under the "user-defined industrial" land use subtype.

In addition, the truck fleet mix is input under the "user-defined industrial" but not in the "unrefrigerated warehouse-no rail" and "refrigerated warehouse-no rail" land use. This possibly leads to underestimating the heavy-duty truck emissions for warehouse activities since no data is filled under this "user-defined industrial" land use subtype.

Therefore, South Coast AQMD staff recommends that the Lead Agency explain why the land use is separated in the CalEEMod analysis; why the fleet mix is not under the "unrefrigerated warehouse-no rail" and "refrigerated warehouse-no rail" land use and include the explanation in the Final EIR. If the explanation is not included in the Final EIR, the Lead Agency should provide reasons for not having them supported by substantial evidence in the record.

RESPONSE A-8.5

The user-defined industrial land use was modeled in CalEEMod in order to separate passenger car and truck vehicle trips. The land use is separated in the CalEEMod analysis into "user defined

industrial" and "user defined commercial" land uses to account for emissions resulting from truck trips only and allows the truck trip lengths associated with industrial and commercial uses to be adjusted consistent with SCAQMD guidance. For example, the truck trip length for trucks associated with the industrial and commercial portion was estimated to be 32.03 miles as explained in the Project AQIA. This truck trip length and truck trips input in CalEEMod were derived based on the weighted average fleet mix of trucks by land use as summarized on Table 5-7 in the Project AQIA. As such, the number of truck trips input into CalEEMod are based on the truck trips and the weighted fleet mix as calculated in the traffic analysis for the Project. Therefore, emissions are appropriately calculated for each truck class by the percentage weight identified in the analysis. An excerpt of Table 5-7 from the Project AQIA is provided below and shows the weighted average of truck by classification for all land uses:

TABLE 5-7: TRUCK FLEET MIX

Land Use	% Vehicle Type			
	LHDT1	LHDT2	MHDT	HHDT
Building B: High-Cube Fulfillment Center	68.66%	13.32%	3.81%	14.21%
Building C: High-Cube Fulfillment Center				
High-Cube Cold Storage Use				
Remaining Industrial: High-Cube Fulfillment Center				
Business Park				
Business Park (Mixed-Use, 75%)				

Note: Project-specific truck fleet mix is based on the number of trips generated by each truck type (LHDT1, LHDT2, MHDT, and HHDT) relative to the total number of truck trips.

Passenger car trips as well as area, energy, water, and waste emissions were modeled under the unrefrigerated and refrigerated warehouse land use types and are based on the trips calculated in the traffic analysis for the Project. As such, inputting non-zero values for acreage, building square footage, and landscape area in the user defined land uses would result in a double counting of emissions from area, energy, water, waste, and refrigerants.

COMMENT A-8.6

Trip Generations

Appendix N – Transportation of the Draft EIR discusses the Proposed Project trip generation and includes the summary in Table 4-2 of the Project Total Trips of 35,314 daily, in which 2,054 trucks trips per day. Although the Project Total Trips from Appendix N match with Appendix C-1 CalEEMod output files, the trip numbers under each land use type are different from Appendix N, an example is shown in Table A to demonstrate the difference.

Table A
Example of the Difference in Trip Numbers between Appendix N and Appendix C-1

Land Use Type	*Appendix N – Transportation*	*Appendix C-1: Air Quality Technical Report – CalEEMod Output Files*
Refrigerated Warehouse-No Rail	*1,062 trips/weekday*	*669 trips/weekday*

Due to the differences, South Coast AQMD staff recommends that the Lead Agency explain the differences and/or revise Appendix N and Appendix C-1 to present consistent values to avoid discrepancies throughout the documents and include the revision in the Final EIR. If the revision is not included in the Final EIR, the Lead Agency should provide reasons supported by substantial evidence in the record to explain why the revision is not included.

RESPONSE A-8.6

The comment states that the total Project trips that were modeled in CalEEMod may not match those presented in the transportation section of the DEIR. As explained above in Response A-8.5, passenger car and truck trips were separated based on land use, with passenger car trips being modeled under the unrefrigerated and refrigerated warehouse, Office Park, Regional Shopping Center and City Park land uses; and truck trips being modeled using the user-defined industrial and commercial land uses. As shown on Table 4.2 of the Project Traffic Analysis, a total of 5,172 passenger car trips are attributed to the industrial warehouse uses of the Project. Accounting for internal capture, this is reduced to 5,042 passenger car trips per day, which matches the number of trips modeled in CalEEMod for the unrefrigerated and refrigerated warehouse uses.

The user-defined industrial land use in CalEEMod was utilized for modeling a total of 1,351 daily truck trips from the industrial land uses and 705 trucks from the commercial (business park) land uses. This value matches the total number of truck trips presented in the Project Traffic Analysis for the combined industrial and commercial land uses.

As shown in the following excerpt from the Project Traffic Analysis, Table 4-2, the total trips for all land uses are summarized as 35,314 trips – consisting of 2,054 truck trips and 33,260 passenger vehicle trips as shown.

Total Passenger Cars	1,356	462	1,818	911	2,442	3,354	34,116	856	815	1,671
Internal Trip Reduction[3]	-86	-86	-172	-42	-42	-84	-856	-21	-21	-42
Total Trucks	83	32	115	33	86	119	2,054	9	4	13
Project Total Trips	**1,353**	**408**	**1,761**	**902**	**2,486**	**3,389**	**35,314**	**844**	**798**	**1,642**

Similarly, the following excerpt from the Project AQIA, shows that the total trips modeled in CalEEMod are 35,317 trips which is 3 trips higher than the 35,314 trips in the Project Traffic Analysis (due to rounding in CalEEMod). Additionally, as noted above, the "user-defined industrial" and "user defined commercial" land use were utilized to model truck trips and to ensure the appropriate truck trip lengths and consequently emissions from trucks were modeled. If the two "user defined" land use categories are totaled, this equals 2,056 trips which represent truck trips and is actually 2 trips higher (due to rounding) than the 2,054 truck trips as illustrated

in the Project Traffic Analysis. As shown, the passenger vehicle and truck trips are appropriately modeled in CalEEMod and no further changes are required.

Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
User Defined Industrial	1,351	110	3.06	358,026	43,259	3,531	98.1	11,467,585
User Defined Commercial	705	58.2	52.9	189,665	22,590	1,864	1,694	6,074,985

5.9.2. Mitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Office Park	19,719	1,601	1,453	5,300,336	394,977	32,067	29,101	106,165,726
Regional Shopping Center	6,354	12,303	8,990	2,766,960	52,049	112,827	82,441	23,751,698
Unrefrigerated Warehouse-No Rail	4,374	359	144	1,166,629	87,617	7,186	2,874	23,367,583
Refrigerated Warehouse-No Rail	669	54.5	22.0	178,407	13,400	1,092	441	3,573,488
City Park	2,145	5,550	6,202	1,171,975	42,961	111,175	124,221	23,474,668
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
User Defined Industrial	1,351	110	3.06	358,026	43,259	3,531	98.1	11,467,585
User Defined Commercial	705	58.2	52.9	189,665	22,590	1,864	1,694	6,074,985

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

5.10.1.2. Mitigated

COMMENT A-8.7

Greenhouse Gas Emissions Analysis

Based on the Draft EIR, the Proposed Project's greenhouse gas (GHG) emissions are calculated using CalEEMod lasted version (v2022.1). The amortized annual construction emissions and Proposed Project GHG emissions prior to mitigations are shown in Tables 4.7-6 and 4.7-7. To reduce GHG emissions, the Lead Agency proposes MM-GHG-1 to MM-GHG-11 and concludes that the Proposed Project's GHG emissions would be less than significant with mitigation incorporated. Table 4.7-8 shows the mitigated Proposed Project's total CO_2e emissions of 91,010.58 metric tons per year (MT/yr CO_2e). However, South Coast AQMD staff has concerns about the conclusion of "less than significant with mitigation incorporated" since the Proposed Project's total GHG emissions with mitigation are greater than the GHG CEQA significance thresholds of 10,000 MT/yr CO_2e. Thus, South Coast AQMD staff recommends that the Lead Agency provide an explanation of how the "less than significant with mitigation incorporated" conclusion is determined in the Final EIR. In the event that the "less than significant with mitigation incorporated" conclusion is incorrect, it's recommended that the Lead Agency revise the GHG emissions section with the correct determination and include the revision in the Final EIR. If the revision is not included in the Final EIR, the Lead Agency should provide reasons supported by substantial evidence in the record to explain why the revision is not included.

Additionally, the Draft EIR discusses the cumulative effects conclusion under the GHG section and indicates the result as "less than cumulatively considerable." As mentioned in the above comment, the GHG emissions would be significant and unavoidable after incorporated mitigation due to the exceedance in the CEQA significance thresholds of 10,000 MTCO2e/year; thus, the conclusion for the cumulative effects should be addressed as cumulatively considerable and not as less than cumulative considerable. Therefore, South Coast AQMD staff recommends that the Lead Agency revise the cumulative effects discussion under the GHG section and include the revision in the Final EIR. If the revision is not included in the Final EIR, the Lead Agency should provide reasons supported by substantial evidence in the record to explain why the revision is not included.

RESPONSE A-8.7

The suggested revision has not been included in the EIR for the following reasons.

March JPA recognizes that SCAQMD has a numeric threshold for industrial projects, but March JPA has not adopted this or any other numeric threshold of significance. There is no requirement under CEQA, the CEQA Guidelines, case law or SCAQMD's adopted GHG thresholds to utilize a numeric threshold of significance to determine a Project's GHG impacts.

Instead, and as described in the Project GHG Analysis, the proposed Project was evaluated on the basis of whether or not it would conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. Importantly, March JPA evaluated the Project's impact on GHG based on consistency with the Riverside County Climate Action Plan (CAP), which is a qualified GHG reduction plan under CEQA Guidelines section 15183.5(b). "Pursuant to sections 15064(h)(3) and 15130(d), a lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project complies with the requirements in a previously adopted plan or mitigation program under specified circumstances." CEQA Guidelines § 15183.5. The Project site is located in the March JPA jurisdiction within Riverside County. Although the County of Riverside does not currently have direct authority over the Project, it is anticipated that in June 2025, Riverside County will assume full land use control over the March JPA Planning Area, due to the planned sunsetting/dissolution of the March JPA. Accordingly, consistency with the County's CAP provides an additional metric to determine if the Project's impacts are significant and provides an appropriate set of policies that are intended to guide development within unincorporated Riverside County.

March JPA's approach is consistent with SCAQMD's Tier 2 threshold, which "consists of determining whether or not the project is consistent with a GHG reduction plan that may be part of a local general plan, for example. The concept embodied in this tier is equivalent to the existing concept of consistency in CEQA Guidelines §§15064(h)(3), 15125(d), or 15152(a). The GHG reduction plan must, at a minimum, comply with AB 32 GHG reduction goals; include emissions estimates agreed upon by either CARB or the AQMD, have been analyzed under CEQA, and have a certified Final CEQA document. Further, the GHG reduction plan must include a GHG emissions inventory tracking mechanism; process to monitor progress in achieving GHG emission reduction targets, and a commitment to remedy the excess emissions if GHG reduction goals are not met (enforcement). If the proposed project is

consistent with the qualifying local GHG reduction plan, it is not significant for GHG emissions." [1]

In addition to meeting CEQA Guidelines 15183.5(b), the Riverside County CAP meets SCAQMD's adopted Tier 2 standard. "The County's GHG reduction targets are consistent with the AB 32, SB 32, and EO S-3-05, and ensure that the County is providing GHG reductions locally that will complement the State and international efforts of stabilizing climate change." CAP Screening Tables, page 3. The County analyzed the CAP in an addendum to the Riverside County General Plan Environmental Impact Report No. 521[2], and filed a Notice of Determination on December 30, 2019.[3] The Riverside County CAP includes a GHG emissions inventory monitoring methodology (CAP section 7.6) and a commitment to update the CAP on or before January 1, 2030. The County's "program will ensure that the effectiveness of all implementation measures are reviewed in advance of 2030 and adjustments to assigned point values accounting for actual effectiveness are made in the post-2030 CAP. If measures included in this CAP Update are found to be ineffective, those measures will be removed or revised in the post-2030 CAP." As explained on pages 3-4 of the CAP screening tables, the CAP is a qualified GHG reduction plan under CEQA Guidelines section §15183.5.

As explained in the CAP:

> "No single project has the ability to generate GHG emissions in sufficient quantities to change the global climate. Rather, it is the incremental contribution of all past, present, and future projects that when combined with all other anthropogenic sources of GHG emissions globally generates climate change impacts. Because GHG emissions are only important in the context of cumulative emissions, the focus of the analysis is on answering the question of whether incremental contributions of GHGs are a cumulatively considerable contribution to climate change impacts. The CAP Update includes a set of mitigation measures designed to substantially lessen cumulative impacts associated with GHG emissions as described in CEQA Guidelines §15130(a)(3), in determining if a project's effects would result in significant impacts." CAP screening tables, page 3.

Under the CAP, projects "that are determined to be above the 3,000 MT CO_2e emissions level shall quantify and disclose the anticipated GHG emissions of the proposed development." The Project GHG Analysis quantified and disclosed the anticipated GHG emissions and used the latest version of the California Emissions Estimator Model (CalEEMod).

Under the CAP, development projects can use screening tables that "assign points for each option incorporated into a project as mitigation or a project design feature (collectively referred to as "feature"). The point values correspond to the minimum emissions reduction expected from each

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[1] https://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgboardsynopsis.pdf?sfvrsn=2

[2] https://rctlmaplanning.rivcoweb.acsitefactory.com/sites/g/files/aldnop416/files/migrated/Portals-14-CAP-2019-AddendumNo1-EIRNo521.pdf

[3] https://rctlmaplanning.rivcoweb.acsitefactory.com/sites/g/files/aldnop416/files/migrated/Portals-14-CAP-2019-FNOD.pdf
https://rctlmaplanning.rivcoweb.acsitefactory.com/sites/g/files/aldnop416/files/migrated/Portals-14-CAP-2019-FNOD.pdf

feature. The menu of features allows maximum flexibility and options for how development projects can implement the GHG reduction measures. Projects that garner at least 100 points will be consistent with the reduction quantities anticipated in the County's CAP Update. Consistent with CEQA Guidelines, such projects would be determined to have a less than significant individual and cumulative impact for GHG emissions." CAP screening table 7-8. See also Project GHG Analysis.

As explained in the Project GHG Analysis:

> "The Project shall implement Screening Table Measures providing for a minimum 100 points per the County Screening Tables. With implementation of MM GHG-1 through MM GHG-12, the Project would be consistent with the CAP's requirement to achieve at least 100 points and thus the Project is considered to have a less than significant individual and cumulatively considerable impact on GHG emissions. The March JPA shall verify incorporation of the identified Screening Table Measures within the Project building plans and site designs prior to the issuance of building permit(s) and/or site plans (as applicable). The March JPA shall verify implementation of the identified Screening Table Measures prior to the issuance of Certificate(s) of Occupancy."

This language has been clarified in the Project GHG Analysis to ensure that each Project site plan shall provide documentation demonstrating implementation of Riverside County Climate Action Plan Screening Table Measures sufficient to provide for a minimum of 100 points per the County Screening Tables. MM-GHG-12 requires each Project site plan implement Riverside County Climate Action Plan Screening Table Measures sufficient to provide for a minimum of 100 points per the County Screening Tables.

With implementation of the mitigation measures identified in the Project GHG Analysis, it was determined that the proposed Project would be consistent with the Riverside County CAP and would therefore have a less than significant impact. Additional air quality mitigation measures have been added to the Project that would further reduce the Project's GHG emissions. Because March JPA has not adopted a numeric threshold, and there is no requirement to do so, the revisions to the EIR suggested by the commenting agency have not been made. As explained above, the Project's GHG emissions and potential impacts have been analyzed in the Draft EIR consistent with the requirements of CEQA and mitigation measures have been incorporated to further reduce the Project's GHG emissions.

COMMENT A-8.9

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 South Coast AQMD are required. The Final EIR 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 EIR 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.

RESPONSE A-8.9

The comment states that should the proposed Project require the use of new stationary equipment, including emergency generators or fire pumps, permits from SCAQMD would be required, and recommends that this discussion be included in the FEIR. There are no required or planned stationary equipment that require permits from SCAQMD. Please see the Project AQIA and Final EIR for analysis of emissions from potential emergency generators, including the application of MM-AQ-24.

CITY OF RIVERSIDE LETTER A-9

COMMENT A-9.12

P242 – Operational Health Risk Assessment *– The DEIR should evaluate the potential health impacts of exposure to DPM and other emissions related to operation of the project on users of the proposed active park, particularly children and similarly vulnerable populations. Measures should be taken to reduce exposure of park users to particulate matter emissions generated by the project should be to the greatest extent feasible.*

RESPONSE A-9.12

The analysis has been revised to include the proposed Park as a sensitive receptor during operation of the proposed Project. As detailed in the Project HRA and Final EIR, the results of the analysis indicate that a less than significant impact would occur for users (including children) of the Park as a result of Project operational emissions. The risk to the Park users would be 1.18 in one million without mitigation and 0.62 with mitigation, both of which are less than the applicable SCAQMD threshold of 10 in one million. Additionally, at this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable threshold of 1.0. The Project HRA contains the model runs and risk calculations.

COMMENT A-9.16

P381 – Feasible Renewable Energy Features *– This section of the DEIR states that the "Specific Plan Area would install approximately [?] solar PV" – what quantity of solar PV is proposed to be installed?*

RESPONSE A-9.16

The air quality and GHG project design features and mitigation measures have been revised and expanded to incorporate additional feasible mitigation in response to comments. MM-GHG-1 requires installation of a rooftop solar photovoltaic system sufficient to generate at least 100% of the building's power requirements, or the maximum permitted by the Riverside County Airport Land Use Commission.

COMMENT A-9.17

P439 – Table 4.7-3 Scoping Plan Consistency *– Action beginning "Further reduce vehicle miles traveled" – Response does not appear to address the specific action from the Scoping Plan as discusses employment growth projections for the RTP/SCS and AQMP and does not directly address the project's consistency with efforts to reduce VMT. This project will generate a substantial amount of new VMT and may be inconsistent with this Scoping Plan action.*

RESPONSE A-9.17

As discussed in the Project VMT Analysis, the Project's retail component will reduce regional VMT and the Project's non-retail component VMT per employee is 5.3% below the WRCOG threshold. Further, MM-AQ-21 requires tenants who employ 250 or more employees on a full- or part-time basis shall comply with South Coast Air Quality Management District (SCAQMD) Rule 2202, On-Road Motor Vehicle Mitigation Options. MM-AQ-21 further requires tenants with less than 250 employees or tenants with 250 or more employees who are exempt from SCAQMD Rule 2202 (as stated in the Rule) shall either (a) join with a tenant who is implementing a program in accordance with Rule 2202 or (b) implement an emission reduction program similar to Rule 2202 with annual reporting of actions and results to the March JPA. In response to this comment, Table 6-2, 2017 Scoping Plan Consistency Summary, of the Project GHG Analysis and Final EIR have been revised accordingly. This revision does not modify any of the analysis or change any conclusions in the Project GHG Analysis and does not add any new significant impacts.

COMMENT A-9.18

P444 – Table 4.7-5 Project Consistency with the SCAG Connect SoCal RTP/SCS – *Measure "Reduce greenhouse gas emissions and improve air quality" – The project may be inconsistent with this measure. The statement "implementation of the Specific Plan would reduce traffic congestion, pollution, and fossil fuel dependence" is unsubstantiated and not supported by evidence. Other sections of this EIR identify significant and unavoidable impacts to criteria air pollutant emissions associated with operation of the project.*

RESPONSE A-9.18

To meet that goal (Connect SoCal Goal 5), "Connect SoCal includes a sustainable communities strategy which sets forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportations measures and policies, if implemented, will reduce the GHG emissions from automobiles and light trucks to achieve the regional GHG targets set by ARB for the SCAG region." The forecasted development pattern is based on a regional growth forecast that was developed by working with local jurisdictions using the most recent land use plans and policies and planning assumptions.[4]

SCAG explicitly found that "For the purpose of determining consistency with Connect SoCal for California Environmental Quality Act (CEQA), grants or other opportunities, lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency."[5] March JPA determines consistency with Connect SoCal based on consistency with the long-term employment and growth projections.

The proposed Project would increase regional employment by approximately 3,622 jobs in total. According to SCAG's 2020-2045 RTP/SCS, employment within Riverside County in 2019 is approximately 812,800 jobs with an anticipated increase to approximately 1,102,700 jobs by 2045, a growth of approximately 289,900 jobs. The proposed Project contributes 1.24% of the anticipated increase in jobs, and therefore, it is consistent with the job growth and would not

[4] https://scag.ca.gov/read-plan-adopted-final-connect-socal-2020

[5] Connect SoCal p. xiv

result in long-term operational employment growth that exceeds planned growth projections in the RTP/SCS or the AQMP or result in employment growth that would substantially add to traffic congestion. Additionally, the Project would comply with the policies set forth in the 2020-2045 RTP/SCS by reducing vehicle trips and VMT, increasing the use of alternative fuel vehicles, and improving energy efficiency.

The proposed Project is consistent with the long-term employment and growth projections used by SCAG in the RTP/SCS and is therefore consistent with Connect SoCal. Moreover, the Project does not impede implementation of improvements to the transportation network, and other transportation measures and policies. Therefore, the Project would be consistent with the SCAG's goal to "reduce the GHG emissions from automobiles and light trucks to achieve the regional GHG targets set by ARB for the SCAG region."

The commenting agency is correct that the Project AQIA identifies significant and unavoidable impacts related to criteria air pollutant emissions associated with Project operation. However, this is not a factor in determining consistency with the RTP/SCS. In fact, the EIR and subsequent addenda that were prepared for Connect SoCal all found that implementation of the plan would result in significant and unavoidable air quality impacts.

> "While the SCAG region may see an increase in $PM_{2.5}$, PM_{10} and SOx emissions, the SCAQMD, AVAPCD, ICAPCD, and MDAQMD have not established regional thresholds to determine significance. The air districts within the SCAG region have only established project-level thresholds (see Table 3.3-9, Table 3.3-10, and Table 3.3-11). Therefore, individual projects must compare anticipated project emissions to the thresholds for the air district within which they are located in order to determine significance on the project-level. Because mobile source emissions of PM_{10} and $PM_{2.5}$ will increase (PM_{10} would increase in Imperial, Orange, Riverside, and San Bernardino Counties and $PM_{2.5}$ would increase in Imperial, Riverside, and San Bernardino Counties), largely as a result of increased total VMT, and SOx would increase in the region at least through 2031, the Plan could contribute to an air quality violation. Further, there is the potential for individual projects to exceed local standards during construction and/or operation for several pollutants. Therefore, this impact is considered to be significant."[6]

While the Project will implement all of the applicable Connect SoCal mitigation measures and several other mitigation measures to reduce impacts to air quality as outlined in the Project AQIA, it would not be feasible to reduce emissions to less than significant levels. Further reduction of emissions must come from cars and trucks emissions, which are regulated by the EPA (Federal), CARB (State) and South Coast Air Quality Management District (Regional) and are outside March JPA's local jurisdiction and control.

Additionally, the modeling conservatively does not account for emission reductions achieved by the use of zero emission vehicles, and as electric vehicles and electric trucks comprise larger portions of the vehicle fleet, emissions of the Project would be overrepresented. Similarly, while construction and operation of the proposed Project would generate GHG emissions, the Project will not interfere with or obstruct any GHG reduction plans and the Project AQIA and Project GHG

[6] ConnectSoCal PEIR, pg. 3.3-61

Analysis identify a comprehensive array of project design features and mitigation measures, which will reduce GHG emissions and improve air quality.

COMMENT A-9.31

Appendix C-1 – Air Quality Report

- *We request detailed information on how the project will comply with Rule 2305 and how future lease agreements will implement emission reducing strategies.*
- *Please include public signage which displays the South Coast Air Quality Management District's, or appropriate authority's, phone number to report violations.*

RESPONSE A-9.31

Any future tenants would be required to comply with all applicable SCAQMD rules, including Rule 2305. The following mitigation measures outline how the Project will implement emission reducing strategies, including through future lease agreements:

- PDF-AQ-1 prohibits the use of natural gas by Specific Plan Area development.
- PDF-GHG-1 requires conduit to be installed in truck courts in logical locations that would allow for the future installation of charging stations for electric trucks, in anticipation of this technology becoming available.
- MM-AQ-6 requires all buildings achieve the 2023 LEED Silver certification standards or equivalent, at a minimum.
- MM-AQ-8 requires all TRU loading docks provide electrical hookups and all loading docks designed to be compatible with SmartWay trucks.
- MM-AQ-9 requires buildings larger than 400,000 total square feet to include a truck operator lounge equipped with clean and accessible amenities such as restrooms, vending machines, television, and air conditioning.
- MM-AQ-11 requires main electrical supply lines and panels have been sized to support 'clean fleet' charging facilities, including heavy-duty and delivery trucks when these trucks become available.
- MM-AQ-14 requires tenants utilize electric or battery-operated equipment for landscape maintenance.
- MM-AQ-17 requires truck drivers to shut off engines when not in use and three-minute truck idling limits.
- MM-AQ-18 requires use of only electric service yard trucks (hostlers), pallet jacks and forklifts, and other on-site equipment, with necessary electrical charging stations provided.
- MM-AQ-19 requires tenants to be provided with information on funding opportunities, such as the Carl Moyer Program, that provide incentives for using cleaner-than-required engines and equipment.
- MM-AQ-20 requires all heavy-duty trucks (Class 7 and 8) domiciled at the project site are model year 2014 or later from start of operations, and shall expedite a transition to

zero-emission vehicles, with the fleet fully zero-emission by December 31, 2030 or when feasible for the intended application, whichever date is later. MM-AQ-20 further requires tenants utilize a "clean fleet" of vehicles/delivery vans/trucks (Class 2 through 6) as part of business operations as follows: For any vehicle (Class 2 through 6) domiciled at the project site, the following "clean fleet" requirements apply: (i) 33% of the fleet will be zero emission vehicles at start of operations, (ii) 65% of the fleet will be zero emission vehicles by December 31, 2026, (iii) 80% of the fleet will be zero emission vehicles by December 31, 2028, and (iv) 100% of the fleet will be zero emission vehicles by December 31, 2030 or when feasible for the intended application, whichever date is later. In response to comments, MM-AQ-20 has been revised to clarify applicable definitions and the factors March JPA will consider in determining the measure's feasibility as the Project site is developed.

- MM-AQ-21 requires tenants who employ 250 or more employees on a full- or part-time basis shall comply with South Coast Air Quality Management District (SCAQMD) Rule 2202, On-Road Motor Vehicle Mitigation Options. MM-AQ-21 further requires tenants with less than 250 employees or tenants with 250 or more employees who are exempt from SCAQMD Rule 2202 (as stated in the Rule) shall either (a) join with a tenant who is implementing a program in accordance with Rule 2202 or (b) implement an emission reduction program similar to Rule 2202 with annual reporting of actions and results to the March JPA.
- MM-AQ-22 requires tenants provide information to employees and truck drivers on: Building energy efficiency, solid waste reduction, recycling, and water conservation; Vehicle GHG emissions, electric vehicle charging availability, and alternate transportation opportunities for commuting; Participation in the Voluntary Interindustry Commerce Solutions (VICS) "Empty Miles" program to improve goods trucking efficiencies; Health effects of diesel particulates, state regulations limiting truck idling time, and the benefits of minimized idling; The importance of minimizing traffic, noise, and air pollutant impacts to any residences in the Project vicinity; Efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.
- MM-AQ-23 requires the facility operator shall periodically sweep the property, including parking lots and truck courts, to remove road dust, tire wear, brake dust, and other contaminants.
- MM-AQ-24 prohibits the use of diesel back-up generators.
- MM-AQ-25 requires the facility operator monitor and ensure compliance with all current air quality regulations for on-road trucks including CARB's Heavy-Duty (Tractor-trailer) Greenhouse Gas Regulation, Periodic Smoke Inspection Program, and the Statewide Truck and Bus Regulation, as applicable.
- MM-GHG-1 requires installation of a rooftop solar photovoltaic system sufficient to generate at least 100% of the building's power requirements, or the maximum permitted by the Riverside County Airport Land Use Commission.
- MM-GHG-7 requires each Project site plan shall provide circuitry, capacity, and equipment for EV charging stations in accordance with Tier 2 of the 2022 CALGreen Code.

- MM-GHG-12 requires each Project site plan implement Riverside County Climate Action Plan Screening Table Measures sufficient to provide for a minimum of 100 points per the County Screening Tables.

MM-AQ-16 requires signage with contact information for the tenant representative, March JPA, County of Riverside, and SCAQMD for complaints about excessive noise, dust, fumes, odors, and perceived Code violations. MM-AQ-17 requires signage detailing the idling restrictions to include telephone numbers of the building facilities manager, South Coast Air Quality Management District and the California Air Resources Board to report violations.

COMMENT A-9.32

Appendix C-2 – Health Risk Assessment

- *The modeling and analysis should be revised evaluate the potential health impacts of exposure to DPM and other emissions related to operation of the project on users of the proposed active park, particularly children and similarly vulnerable populations.*

RESPONSE A-9.32

See Response to Comment A-9.12.

BLUM COLLINS & HO LLP (GOLDEN STATE ENVIRONMENTAL JUSTICE ALLIANCE LETTER O-3

COMMENT O-3.8

California's Building Energy Code Compliance Software (CBECC) is the State's only approved energy compliance modeling software for non-residential buildings in compliance with Title 24. CalEEMod is not listed as an approved software. The CalEEMod-based modeling in the EIR and appendices does not comply with the 2022 Building Energy Efficiency Standards and underreports the project's significant Energy impacts and fuel consumption to the public and decision makers. Since the MND did not accurately or adequately model the energy impacts in compliance with Title 24, a finding of significance must be made. A revised EIR with modeling using the approved software (CBECC) must be circulated for public review in order to adequately analyze the project's significant environmental impacts. This is vital as the EIR utilizes CalEEMod as a source in its methodology and analysis, which is clearly not the approved software.

RESPONSE O-3.8

The commenter is correct that the CBECC model is the approved compliance method specifically for Title 24 compliance, which would be required for any development project at the time of physical building construction (approximately 12-18 months after entitlement). The compliance modeling software that is referenced by the commenter is used to confirm final design, with detailed information included in construction drawings, is Title 24 compliant. The final design, construction drawings are not available at this time and are not typically prepared until after the Project is approved/entitled. CBECC will be used by the design team to ensure the buildings comply with Title prior to construction.

The Project Energy Analysis correctly utilizes CalEEMod which estimates energy demand based on average intensity factors for similar land use types based on the site plans provided to the March JPA for entitlement. Since the Project's tenants are unknown at this time, and information about the future tenants' energy use is not available at this time, it is appropriate to use the CalEEMod default assumptions which have been derived by the California Air Pollution Control Officers Association (CAPCOA) based on survey data. Additionally, CalEEMod is based on the previous 2019 version of Title 24 and does not account for the latest 2022 Title 24 requirements that became effective on January 1, 2023. The modeling also does not take into account MM-AQ-6, which requires that all buildings constructed shall achieve the 2023 LEED Silver certification standards or equivalent, at a minimum.

The MMRP and the requirement to obtain building permits will require compliance with the most current version of Title 24 at the time of approval, including approved modeling to show compliance. Therefore, revisions to the Project Energy Analysis are not required.

COMMENT O-3.9

Further, 4.7-5. Project Consistency with the SCAG Connect SoCal RTP/SCS finds that the project does not conflict with all goals of Connect SoCal, resulting in less than significant impacts. However, the consistency analysis in the EIR is misleading to the public and decision makers. The project results in several significant and unavoidable cumulatively considerable impacts, including Air Quality and Noise. For example, the EIR finds the project is consistent with Goal 5: "Reduce greenhouse gas emissions and improve air quality." However, as determined in the EIR itself, the project will impede the SCAG region's ability to reduce greenhouse gas emissions and improve air quality because it will result in significant and unavoidable cumulatively considerable impacts to Air Quality. Additionally, due to errors in modeling and modeling without supporting evidence, as noted throughout this comment letter and attachments, the proposed project is directly inconsistent with Goal 5 to reduce greenhouse gas emissions and improve air quality, Goal 6 to support healthy and equitable communities, and Goal 7 to adapt to a changing climate. This information must be included for analysis with all Connect SoCal Goals and a finding of significance must be made in a revised EIR, including analysis discussing the project's impacts on the SB 535 Disadvantaged Communities.

RESPONSE O-3.9

The consistency analysis in the Project AQIA is accurate. Goal 5 of Connect SoCal is to reduce greenhouse gas emissions and improve air quality. To meet that goal, "Connect SoCal includes a sustainable communities strategy which sets forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportations measures and policies, if implemented, will reduce the GHG emissions from automobiles and light trucks to achieve the regional GHG targets set by ARB for the SCAG region." The forecasted development pattern is based on a regional growth forecast that was developed by working with local jurisdictions using the most recent land use plans and policies and planning assumptions. [https://scag.ca.gov/read-plan-adopted-final-connect-socal-2020]

SCAG explicitly found that "For the purpose of determining consistency with Connect SoCal for California Environmental Quality Act (CEQA), grants or other opportunities, lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency." Connect SoCal p. xiv. March JPA determines consistency with Connect SoCal based on consistency with

the long-term employment and growth projections. The SCS also indicates that this is a jobs poor area so providing more jobs will actually reduce GHH emissions and reduce VMT as it will provide local jobs to achieve a more favorable jobs-housing balance.

The proposed Project would increase regional employment by approximately 3,622 jobs. According to SCAG's 2020-2045 RTP/SCS, employment within Riverside County in 2019 is approximately 812,800 jobs with an anticipated increase to approximately 1,102,700 jobs by 2045, a growth of approximately 289,900 jobs. The proposed Project represents 1.24% of the anticipated increase in jobs, and therefore, would not result in long-term operational employment growth that exceeds planned growth projections in the RTP/SCS or the AQMP, or result in employment growth that would substantially add to traffic congestion. Additionally, the Project would comply with the policies set forth in the 2020-2045 RTP/SCS by reducing vehicle trips and VMT, increasing the use of alternative fuel vehicles, and improving energy efficiency.

The proposed Project is consistent with the long-term employment and growth projections used by SCAG in the RTP/SCS and is therefore consistent with Connect SoCal. Moreover, the Project does not impede implementation of improvements to the transportation network, and other transportations measures and policies. Therefore, the Project will not impede SCAG's efforts to "reduce the GHG emissions from automobiles and light trucks to achieve the regional GHG targets set by ARB for the SCAG region."

The commenter is correct that Project would exceed regional significance thresholds for emissions of VOC, NO_x, CO, and PM_{10} (also $PM_{2.5}$ as disclosed in the Project AQIA). However, this is not a factor in determining consistency with the RTP/SCS. In fact, the Connect SoCal EIR and subsequent addenda that were prepared for Connect SoCal[7] all found that implementation of the plan would result in significant and unavoidable air quality impacts.

> "While the SCAG region may see an increase in $PM_{2.5}$, PM_{10} and SOx emissions, the SCAQMD, AVAPCD, ICAPCD, and MDAQMD have not established regional thresholds to determine significance. The air districts within the SCAG region have only established project-level thresholds (see Table 3.3-9, Table 3.3-10, and Table 3.3-11). Therefore, individual projects must compare anticipated project emissions to the thresholds for the air district within which they are located in order to determine significance on the project-level. Because mobile source emissions of PM_{10} and $PM_{2.5}$ will increase (PM_{10} would increase in Imperial, Orange, Riverside, and San Bernardino Counties and $PM_{2.5}$ would increase in Imperial, Riverside, and San Bernardino Counties), largely as a result of increased total VMT, and SOx would increase in the region at least through 2031, the Plan could contribute to an air quality violation. Further, there is the potential for individual

[7] https://scag.ca.gov/sites/main/files/file-attachments/fpeir_connectsocal_complete.pdf?1607981618;
https://scag.ca.gov/sites/main/files/file-attachments/fpeir_connectsocal_addendum_complete.pdf?1606004379;
https://scag.ca.gov/sites/main/files/file-attachments/final-addendum-02-peir-110421.pdf?1636047701;
https://scag.ca.gov/sites/main/files/file-attachments/final-addendum-03-peir.pdf?1664044078;
https://scag.ca.gov/sites/main/files/file-attachments/23-2907-final-addendum-04-peir.pdf;
https://scag.ca.gov/sites/main/files/file-attachments/23-2907-final-addendum-04-peir.pdf

projects to exceed local standards during construction and/or operation for several pollutants. Therefore, this impact is considered to be significant." PEIR, pg. 3.3-61.

The Connect SoCal EIR included Mitigation Measure PMM-AQ-1 that suggests mitigation measures that local agencies should consider to reduce substantial adverse effects related to violating air quality standards. when approving development projects . As explained in the table below, the Project is consistent with and incorporates all of the applicable suggested mitigation measures in Connect SoCal regarding air quality.

Connect SoCal EIR PMM-AQ-1 - In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to violating air quality standards. Such measures may include the following or other comparable measures identified by the Lead Agency:	
a) Minimize land disturbance.	**Consistent**. MM-AQ-2 limits amount of daily grading as follows: During Phase 1, areas of active ground disturbance shall not exceed a maximum of 20 acres per day for Mass Grading and 20 acres per day for Blasting & Rock Handling. During Phase 2, the area of active ground disturbance shall not exceed a maximum of 20 acres per day for Remedial Grading. The construction contractor shall submit a grading log to the March JPA every two weeks documenting acreage graded or equivalent cubic yardage to ensure compliance.
b) Suspend grading and earth moving when wind gusts exceed 25 miles per hour unless the soil is wet enough to prevent dust plumes.	**Consistent.** Project will comply with SCAQMD Rule 403, Fugitive Dust, which requires implementation of Table 3 contingency measures when wind gusts exceed 25 miles per hour.
c) Cover trucks when hauling dirt.	**Consistent.** Project will comply with SCAQMD Rule 403, Fugitive Dust, which requires coverage of haul vehicles.
d) Stabilize the surface of dirt piles if not removed immediately.	**Consistent.** Project will comply with SCAQMD Rule 403, Fugitive Dust, which requires stabilization of open storage piles.
e) Limit vehicular paths on unpaved surfaces and stabilize any temporary roads.	**Consistent.** Project will comply with SCAQMD Rule 403, Fugitive Dust, which

	requires watering of, or application of a chemical stabilizer to, unpaved roads.
f) Minimize unnecessary vehicular and machinery activities.	**Consistent.** Project will comply with SCAQMD Rule 403, Fugitive Dust, which requires establishing stabilized haul routes, limiting vehicular travel to those routes, and preventing motor vehicle and/or off-road vehicle trespassing, parking and/or access by installing barriers, curbs, fences, gates, posts, signs, shrubs, trees or other effective control measures.
g) Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway.	**Consistent.** Project will comply with SCAQMD Rule 403, Fugitive Dust, which requires all track-out from an active operation be removed at the conclusion of each workday or evening shift.
h) Revegetate disturbed land, including vehicular paths created during construction to avoid future off-road vehicular activities.	**Consistent.** Project will comply with SCAQMD Rule 403, Fugitive Dust, which requires stabilization of soils, materials, and slopes through hydroseeding and soil binders until vegetation or ground cover growth
i) On Caltrans projects, Caltrans Standard Specifications 10-Dust Control, 17-Watering, and 18-Dust Palliative shall be incorporated into project specifications.	**Not Applicable.**
j) Require contractors to assemble a comprehensive inventory list (i.e., make, model, engine year, horsepower, emission rates) of all heavy-duty off-road (portable and mobile) equipment (50 horsepower and greater) that could be used an aggregate of 40 or more hours for the construction project. Prepare a plan for approval by the applicable air district demonstrating achievement of the applicable percent reduction for a CARB-approved fleet.	**Consistent.** MM-AQ-2 requires the construction contractor to submit biweekly construction equipment hours log to the March JPA. In the event alternate equipment is required, the applicant shall provide documentation demonstrating equivalent or reduced emissions based on horsepower and hours of operation.
k) Ensure that all construction equipment is properly tuned and maintained.	**Consistent.** MM-AQ-3 requires all construction equipment to be tuned and maintained in accordance with the

	manufacturer's specifications, with maintenance records onsite and available to regulatory authorities upon request.
L) Minimize idling time to 5 minutes—saves fuel and reduces emissions.	**Consistent.** MM-AQ-3 prohibits construction equipment idling longer than 3 minutes.
m) Provide an operational water truck on-site at all times. Use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas. Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway.	**Consistent.** As stated in Section 4.9, Hydrology and Water Quality, of the Draft EIR, grading and construction of the Project would include spraying with water trucks for soil compaction and dust suppression.
n) Utilize existing power sources (e.g., power poles) or clean fuel generators rather than temporary power generators.	**Consistent.** MM-AQ-3 requires the designation of an area where electric-powered construction vehicles and equipment can be charged. MM-AQ-3 further prohibits the use of diesel-powered portable generators, unless necessary due to emergency situations or constrained supply.
o) Develop a traffic plan to minimize traffic flow interference from construction activities. The plan may include advance public notice of routing, use of public transportation, and satellite parking areas with a shuttle service. Schedule operations affecting traffic for off-peak hours. Minimize obstruction of through-traffic lanes. Provide a flag person to guide traffic properly and ensure safety at construction sites.	**Consistent.** MM-TRA-1 requires the implementation of a Construction Traffic Management Plan to address potential construction-related traffic detours and disruptions to ensure that to the extent practical, construction traffic would access the Project site during off-peak hours.
p) As appropriate require that portable engines and portable engine-driven equipment units used at the project work site, with the exception of on-road and off-road motor vehicles, obtain CARB Portable Equipment Registration with the state or a local district permit. Arrange appropriate consultations with the CARB or the District to determine registration and permitting requirements prior to equipment operation at the site.	**Not Applicable.** This is a voluntary program for owners or operators of portable engines and other types of equipment can register their units under the CARB Statewide Portable Equipment Registration Program (PERP) in order to operate their equipment throughout California without having to obtain individual permits from local air districts. https://ww2.arb.ca.gov/our-work/programs/portable-equipment-registration-program-perp.

q) Require projects within 500 feet of residences, hospitals, or schools to use Tier 4 equipment for all engines above 50 horsepower (hp) unless the individual project can demonstrate that Tier 4 engines would not be required to mitigate emissions below significance thresholds.	**Consistent.** MM-AQ-1 requires that off-road equipment used during construction shall meet CARB Tier 4 Final emission standards or better. MM-AQ-3 requires the construction contractor to use heavy-duty hauling trucks that are model year 2014 or later and to use electric-powered hand tools, forklifts and pressure washers, to the extent feasible.

While the Project will implement all of the applicable Connect SoCal mitigation measures and additional mitigation measures to reduce impacts to air quality, it would not be feasible to reduce emissions to less than significant levels. Further reduction of emissions must come from car and trucks emissions, which are regulated by the EPA (Federal), CARB (State) and South Coast Air Quality Management District (Regional) and are outside March JPA's local jurisdiction and control.

Additionally, the modeling conservatively does not account for emission reductions achieved by the use of zero emission vehicles, and as electric vehicles and electric trucks comprise larger portions of the vehicle fleet, emissions of the Project would be overrepresented. Similarly, while construction and operation of the proposed Project would generate GHG emissions, the Project will not interfere with or obstruct any GHG reduction plans and will implement several mitigation measures and design features that would reduce overall GHG emissions.

The commenter does not explain why the Project is inconsistent with Goal 7 of Connect SoCal. The full text of Goal 7 is to "Adapt to a changing climate and support an integrated regional development pattern and transportation network." Connect SoCal defines Climate Change Adaptation as "The Process of adjusting to actual or expected climate change and its effects, in order to moderate or avoid harm. Adaptation addresses the impacts but not the causes of climate change." The Project supports an integrated regional development pattern that was accounted for in development of Connect SoCal. The Project itself will not impede SCAG's efforts to adapt to a changing climate, and includes the following project design features and mitigation measures to further reduce GHG emissions:

- PDF-AQ-1 prohibits the use of natural gas by Specific Plan Area development.
- MM-AQ-1 requires all offroad construction equipment to meet CARB Tier 4 Final emissions standards or better.
- MM-AQ-3 requires the construction contractor to use heavy-duty hauling trucks that are model year 2014 or later and electric-powered hand tools, forklifts and pressure washers, to the extent feasible and further requires the designation of an area where electric-powered construction vehicles and equipment can charge. MM-AQ-17 prohibits construction equipment idling for more than three minutes and the use of diesel-powered generators.

- MM-AQ-6 requires all buildings achieve the 2023 LEED Silver certification standards or equivalent, at a minimum.
- MM-AQ-7 requires that each Project building is designed for passive heating and cooling and is designed to include natural light.
- MM-AQ-8 requires all TRU loading docks provide electrical hookups and all loading docks designed to be compatible with SmartWay trucks.
- MM-AQ-11 requires main electrical supply lines and panels have been sized to support 'clean fleet' charging facilities, including heavy-duty and delivery trucks when these trucks become available.
- MM-AQ-13 requires electrical service or charging stations be provided in convenient locations for electric and battery-powered landscape maintenance equipment.
- MM-AQ-14 requires tenants utilize electric or battery-operated equipment for landscape maintenance.
- MM-AQ-17 requires truck drivers to shut off engines when not in use and three-minute truck idling limits.
- MM-AQ-18 requires use of only electric service yard trucks (hostlers), pallet jacks and forklifts, and other on-site equipment, with necessary electrical charging stations provided.
- MM-AQ-20 requires all heavy-duty trucks (Class 7 and 8) domiciled at the project site are model year 2014 or later from start of operations, and shall expedite a transition to zero-emission vehicles, with the fleet fully zero-emission by December 31, 2030 or when feasible for the intended application, whichever date is later. MM-AQ-20 further requires tenants utilize a "clean fleet" of vehicles/delivery vans/trucks (Class 2 through 6) as part of business operations as follows: For any vehicle (Class 2 through 6) domiciled at the project site, the following "clean fleet" requirements apply: (i) 33% of the fleet will be zero emission vehicles at start of operations, (ii) 65% of the fleet will be zero emission vehicles by December 31, 2026, (iii) 80% of the fleet will be zero emission vehicles by December 31, 2028, and (iv) 100% of the fleet will be zero emission vehicles by December 31, 2030 or when feasible for the intended application, whichever date is later. In response to comments, MM-AQ-20 has been revised to clarify applicable definitions and the factors March JPA will consider in determining the measure's feasibility as the Project site is developed.
- MM-AQ-22 requires tenants provide information to employees and truck drivers on: Building energy efficiency, solid waste reduction, recycling, and water conservation; Vehicle GHG emissions, electric vehicle charging availability, and alternate transportation opportunities for commuting; Participation in the Voluntary Interindustry Commerce Solutions (VICS) "Empty Miles" program to improve goods trucking efficiencies; Health effects of diesel particulates, state regulations limiting truck idling time, and the benefits of minimized idling; The importance of minimizing traffic, noise, and air pollutant impacts to any residences in the Project vicinity; Efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.
- MM-AQ-24 prohibits the use of diesel back-up generators.

- MM-AQ-25 requires the facility operator monitor and ensure compliance with all current air quality regulations for on-road trucks including CARB's Heavy-Duty (Tractor-trailer) Greenhouse Gas Regulation, Periodic Smoke Inspection Program, and the Statewide Truck and Bus Regulation, as applicable.
- PDF-GHG-1 requires conduit to be installed in truck courts in logical locations that would allow for the future installation of charging stations for electric trucks, in anticipation of this technology becoming available.
- MM-GHG-1 requires installation of a rooftop solar photovoltaic system sufficient to generate at least 100% of the building's power requirements, or the maximum permitted by the Riverside County Airport Land Use Commission.
- MM-GHG-7 requires each Project site plan shall provide circuitry, capacity, and equipment for EV charging stations in accordance with Tier 2 of the 2022 CALGreen Code.
- MM-GHG-12 requires each Project site plan implement Riverside County Climate Action Plan Screening Table Measures sufficient to provide for a minimum of 100 points per the County Screening Tables. MM-GHG-2 through MM-GHG-6 require additional building design features to reduce GHG emissions.

COMMENT O-3.17

The EIR relies upon erroneous Energy modeling to determine that the project will meet sustainability requirements. As noted above, the EIR did not model the project's energy consumption in compliance with Title 24 modeling software. Further, the EIR states here that "the Project would be a relatively minor energy consumer compared to other local and regional users. Thus, the proposed energy consumption would not be considered a significant irreversible environmental effect," without providing a definition of "relatively minor" or the other "local and regional users" it compares the project to without quantification. The EIR also does not discuss the project's significant and unavoidable Air Quality impacts or the project's required changes in land use designations (General Plan Amendment and Zone Change). The EIR must be revised to include a finding of significance due to the project's significant and unavoidable Air Quality impacts and direct contribution to climate change.

RESPONSE O-3.17

Please see the Response O-3.8 above regarding modeling for Title 24. The energy modeling is not erroneous. The Project Energy Analysis analyzed the Project's energy impacts and are consistent with Guidelines Section 15126.4 and Appendix F of the CEQA Guidelines. March JPA used the correct threshold from Appendix G and CEQA Guidelines Section 15126.4 "Would the Project result in wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation? The EIR includes details on energy usage from construction and operations, including: building energy (electricity and natural gas) use, water consumption, and transportation-related fuel consumption. The methodology is based on Guidelines Appendix F and is entirely consistent with CEQA and the CEQA Guidelines.

As explained above, the Project has been revised to include additional mitigation measures that will further reduce energy usage and will minimize the irreversible impacts to non-renewable resources.

COMMENT O-3.26

Failure to Include PDFs as Mitigation Measures

According to the DEIR, the Project intends to include air quality Project Design Features ("PDFs"). Specifically, the DEIR states:

> *"The following Project Design Features (PDFs) have been incorporated into the Project and the impact analysis in Section 4.2.6 below.*

***PDF-AQ-1** Offroad equipment used during construction shall meet CARB Tier 4 Final emissions standards or better.*

***PDF-AQ-2 Construction Budget.** To ensure construction activities occur within the assumptions utilized in the Air Quality Impact Analysis (AQIA) (Appendix C-1) and disclosed in the EIR, the following shall be implemented:*

- *During each Phase of Project construction, the operating hours of construction equipment on site shall not exceed the assumptions set forth in Table 5-2 of the AQIA. In the event alternate equipment is required, the applicant shall provide documentation demonstrating equivalent or reduced emissions based on horsepower and hours of operation. The construction contractor shall submit a construction equipment hours log to the March JPA every 2 weeks to ensure compliance.*
- *During Phase 1, areas of active ground disturbance shall not exceed a maximum of 20 acres per day for Mass Grading and 20 acres per day for Blasting & Rock Handling. During Phase 2, the area of active ground disturbance shall not exceed a maximum of 20 acres per day for Remedial Grading. The construction contractor shall submit a grading log to the March JPA every two weeks documenting acreage graded or equivalent cubic yardage to ensure compliance. "Active disturbance" does not include moving of equipment from staging area(s) to grading areas.*

***PDF-AQ-3 Future Site Plans.** All Specific Plan Area site plans shall include documentation confirming the site plan's environmental impacts do not exceed the impacts identified and disclosed in this EIR. Absent such documentation, additional environmental review shall be required.*

***PDF-AQ-4 No Natural Gas Use.** Specific Plan Area development shall not utilize natural gas. In the event a future structure requires access to any available natural gas infrastructure, additional environmental review shall be required" (p. 4.2-15).*

However, the Project's air quality analysis is inadequate, as the DEIR should have incorporated the above-mentioned PDFs as formal mitigation measures. According to the Association of Environmental Professionals ("AEP") CEQA Portal Topic Paper on mitigation measures:

> *"While not "mitigation", a good practice is to include those project design feature(s) that address environmental impacts in the mitigation monitoring and reporting program (MMRP). Often the MMRP is all that accompanies building and construction plans through the permit process. If the design features are not listed as important to addressing an environmental impact, it is easy for someone not involved in the original environmental process to approve a change to the project that could eliminate one or more of the design features without understanding the resulting environmental impact."*[1]

As demonstrated above, PDFs that are not formally included as mitigation measures may be eliminated from the Project's design altogether. Thus, as the PDFs described in the DEIR are not formally included as mitigation measures, we cannot guarantee that they would be implemented, monitored, and enforced on the Project site. This poses a problem, as the DEIR's air modeling includes the application of PDF-AQ-1, Tier 4 Final off-road equipment (p. 4.2-27). As such, until the DEIR guarantees the use of Tier 4 Final off-road equipment in a formal mitigation measure, the DEIR's air modeling overestimates the reduction to the Project's construction emissions and should not be relied upon to determine Project significance. A revised EIR should be prepared to adequately implement the above-mentioned PDFs as formal mitigation measures.

RESPONSE O-3.26

In response to comments, as part of the Recirculated Draft EIR, PDF-AQ-1 became MM-AQ-1, PDF-AQ-2 became MM-AQ-2, and PDF-AQ-3 became MM-AQ-5. The analysis in the Project AQIA and Project HRA was updated to evaluate the Project with and without these mitigation measures. Regarding PDF-AQ-1 (previously PDF-AQ-4), although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and included in the MMRP, consistent with good practice identified by the Association of Environmental Professionals referenced in the comment. March JPA will monitor compliance through the MMRP.

COMMENT O-3.27

Diesel Particulate Matter Emissions Inadequately Evaluated

The DEIR concludes that the proposed Project would result in a less-than-significant health risk impact based on a quantified construction and mobile-source operational health risk assessment ("HRA"), which is detailed in Health Risk Assessment Technical Report ("HRA Report") as Appendix C-2 to the DEIR. Specifically, the HRA Report estimates that the maximum cancer risk posed to nearby, existing residential sensitive receptors associated with Project construction and operation would be 1.03 in one million, which would not exceed the SCAQMD significance threshold of 10 in one million (see excerpt below) (p. 5, Table ES-3).

TABLE ES-3: SUMMARY OF CONSTRUCTION AND OPERATIONAL CANCER AND NON-CANCER RISKS

Time Period	Location	Maximum Lifetime Cancer Risk (Risk per Million)	Significance Threshold (Risk per Million)	Exceeds Significance Threshold
30 Year Exposure	Maximum Exposed Sensitive Receptor	1.03	10	NO
Time Period	**Location**	**Maximum Hazard Index**	**Significance Threshold**	**Exceeds Significance Threshold**
Annual Average	Maximum Exposed Sensitive Receptor	≤0.01	1.0	NO

However, the DEIR's evaluation of the Project's potential health risk impacts, as well as the subsequent less-than-significant impact conclusion, is incorrect for three reasons.

First, the DEIR's construction HRA incorrectly assumes the application of PDF-AQ-1 and PDF-AQ-2. Specifically, the DEIR states:

> *"The health risk assessment included application of PDF-AQ-1, Tier 4 Final off-road equipment. Additionally, as required by PDF-AQ-2, throughout construction the applicant will demonstrate compliance with all construction equipment assumptions included in Appendix C-1 of this EIR" (p. 4.2-32).*

However, the incorporation of PDFs is unsubstantiated. As previously discussed, AEP guidance indicates that PDFs which are not formally included as mitigation measures may be eliminated from the Project's design altogether.[2] As the use of Tier 4 Final off-road equipment and compliance with all construction equipment assumptions are not incorporated as formal mitigation measures, we cannot guarantee that they would be implemented, monitored, and enforced on the Project site. Thus, DEIR's construction HRA relies on an underestimated DPM concentration, and the resulting cancer risk should not be relied upon to determine Project significance.

RESPONSE O-3.27

This comment recommends the EIR analysis evaluate emissions with and without PDF-AQ-1 and PDF-AQ-2. As discussed in Response O-3.26, above, these project design features were converted to mitigation measures and the Project HRA analyzed Project construction and operational DPM emissions for both without mitigation and with mitigation scenarios. As shown in Table ES-3 of the Project HRA, the unmitigated MEIR (R11) the maximum incremental cancer risk attributable to Project construction and operational-source DPM emissions is estimated at 4.05 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be ≤0.01, which would not exceed the applicable significance threshold of 1.0. At the mitigated MEIR (R12), the maximum incremental cancer risk attributable to Project construction and operational-source DPM emissions is estimated at 1.23 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0.

Comment O-3.28

Second, the DEIR's operational HRA underestimates the Fraction of Time At Home ("FAH") values. Specifically, the HRA utilizes a FAH value of 0.85 for the third trimester (age -0.25 to 0) and infant (age 0 to 2) receptors, and an FAH value of 0.72 for the child receptors (age 2 to 16) (see excerpts below) (Appendix C-2, p. 22, Table 2-7).

TABLE 2-7: EXPOSURE ASSUMPTIONS FOR INDIVIDUAL CANCER RISK (30 YEAR RESIDENTIAL)

Age	Daily Breathing Rate (L/kg-day)	Age Specific Factor	Exposure Duration (years)	Fraction of Time at Home	Exposure Frequency (days/year)	Exposure Time (hours/day)
-0.25 to 0	361	10	0.25	0.85	350	24
0 to 2	1,090	10	2	0.85	350	24
2 to 16	572	3	14	0.72	350	24
16 to 30	261	1	14	0.73	350	24

However, the FAH values used for the third trimester, infant, and childhood receptors are incorrect, as SCAQMD guidance clearly states:

> *"For Tiers 1,2, and 3 screening purposes, the FAH is assumed to be 1 for ages third trimester to 16. As a default, children are assumed to attend a daycare or school in close proximity to their home and no discount should be taken for time spent outside of the area affected by the facility's emissions. People older than age 16 are assumed to spend only 73 percent of their time at home."*[3]

Per SCAQMD guidance, the HRA Report should have used an FAH of 1 for the third trimester, infant, and child receptors. By relying on incorrect FAH values, the DEIR underestimates the cancer risk posed to nearby, existing sensitive receptors as a result of Project operation.

Response O-3.28

Contrary to the comment's statement that the HRA utilizes incorrect fraction of time at home ("FAH") values for the -0.25 to 0, 0 to 2, and 2 to 16 age bins, the analysis utilized fraction of time at home values consistent with OEHHA's Risk Assessment Guidelines.

Therefore, the HRA appropriately accounted for exposure to children. The analysis considers a conservative scenario in which a child is born at the start of Project construction and exposed to construction-related emissions and is then exposed to Project operational emissions for the remainder of the 30-year exposure duration. The analysis also analyzes a worst-case operational scenario in which a child is exposed to Project operational emissions from the third trimester through the first 30 years of life. These scenarios conservatively assume that emissions will remain static throughout the life of the Project and do not account for future emission reductions that would occur as more stringent emission standards and regulations are implemented.

It should be noted that SCAQMD's guidelines cited by the commenter apply specifically to HRAs performed under Rules 1401, 1401.1, and 212, which are applicable to permitting of stationary sources. The Project is not a stationary source and the guidelines cited in the comment are inapplicable here.

COMMENT O-3.29

Third, further review of the HRA Report demonstrates that the HRAs may fail to include Age Sensitivity Factors ("ASFs"). Regarding ASFs, OEHHA guidance states:

> *"Studies have shown that young animals are more sensitive than adult animals to exposure to many carcinogens (OEHHA, 2009). Therefore, OEHHA developed age sensitivity factors (ASFs) to take into account the increased sensitivity to carcinogens during early-in-life exposure (table 8-3). These factors were developed and described in detail in OEHHA (2009). In the absence of chemical-specific data, OEHHA recommends a default ASF of 10 for the third trimester to age 2 years, and an ASF of 3 for ages 2 through 15 years to account for potential increased sensitivity to carcinogens during childhood."*

However, while the HRA Report includes ASFs in their exposure assumption tables, the equation to produce carcinogenic risk estimates, as shown below, is incorrect and underestimated (p. 23-24).

RISKair = DOSEair x CPF x ED/AT

Where:

DOSEair	=	chronic daily intake (mg/kg/day)
CPF	=	cancer potency factor
ED	=	number of years within particular age group
AT	=	averaging time

Instead, the HRA Report should have used the following equation that includes ASFs:

$$Cancer\ Risk_{AIR} = Dose_{AIR} \times CPF \times ASF \times FAH \times \frac{ED}{AT}$$

By potentially failing to include ASF values in the carcinogenic risk estimate equation, the DEIR's HRA underestimates the cancer risk posed to nearby, existing sensitive receptors as a result of Project construction and operation. As such, a revised EIR should be prepared to include an updated analysis correctly accounting for ASF values.

RESPONSE O-3.29

The comment states that the HRA may have failed to incorporate ASFs in the risk calculations. It should be noted that the formula presented on pages 23-24 of the analysis erroneously omitted ASFs and has been corrected in the Project HRA of the Final EIR. ASFs were correctly accounted for in the actual risk calculations, as shown in Appendix 2.4 of the Project HRA. As such, the resulting risk remains unchanged.

STONE CREEK RESIDENTS FOR SMART GROWTH LETTER O-4

COMMENT O-4.3

Air quality impacts: The area described already has the worst air quality of any region of the United States. You have identified in your Draft Environmental Impact Report that there will be "significant and unavoidable" impacts to an area of the City and County that already bears an undue burden of pollution. Within a 5 km range of the proposed building site, there is already 45 million square feet of warehouses, generating over 30,000 truck trips, and spewing over 40 lbs of Diesel Particulate matter into the air daily. This does not include the other proposed warehouses in the immediate vicinity, including the one at the Sycamore Canyon site, that have already been approved to be built. Given the effects that Diesel PM accounts for 70% of cancers attributable to toxic air contaminants, many local residents have expressed concerns for the health affects that this may have on them and their families.

RESPONSE O-4.3

The Project AQIA extensively discusses regional Air Quality. As shown on Exhibit 2-A of the Project AQIA, despite a significant increase in vehicle miles traveled, gross state product, and population, the cancer risk associated with diesel particulate matter emissions has decreased since 1990. In addition, SCAQMD has conducted an in-depth periodic analysis of TACs and their resulting health risks throughout the air basin. This study, the Multiple Air Toxics Exposure Study in the South Coast Air Basin, shows that cancer risk has decreased by

approximately 83% between MATES II (1998) and MATES V (2018) at the nearest monitored location to the Project site. As the region and state continue to implement increasingly stringent emission controls and the electrification of truck fleets continues, it is anticipated that this trend would continue.

Additionally, the Project HRA assesses the Project's health risks. At R11 (971 Saltcoats Drive), the maximally exposed individual receptor (MEIR), the maximum incremental cancer risk attributable to Project construction-source DPM emissions is estimated at 4.57 in one million without mitigation and 0.56 in one million with mitigation, both of which are less than the SCAQMD significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01 with and without mitigation, which would not exceed the applicable threshold of 1.0.

For unmitigated operations, the residential land use with the greatest potential exposure to Project operational-source DPM emissions is Location R2 (20351 Camino Del Sol). At the unmitigated MEIR, the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 4.55 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be ≤0.01, which would not exceed the applicable significance threshold of 1.0. At the mitigated MEIR -R12 (20620 Iris Canyon Road), the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 2.23 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0.

The nearest school is the preschool located at Grove Community Church (Location R8), the maximum incremental cancer risk impact attributable to Project construction without mitigation is calculated to be 0.44 in one million, and 0.05 in one million with mitigation, both of which are less than the significance threshold of 10 in one million. The maximum incremental cancer risk impact attributable to Project operations without mitigation is calculated to be 0.65 in one million and with mitigation is calculated to be 0.33 in one million, both of which are less than the significance threshold of 10 in one million. At this same location, non-cancer risks attributable to Project construction and operations were calculated to be <0.01 with and without mitigation, which would not exceed the applicable significance threshold of 1.0. As such, the Project construction and operations would not cause a significant human health or cancer risk to nearby school children. The Project would result in less than significant human health or cancer risks.

Please see the Project AQIA and Final EIR for the discussion of cumulative health risks from toxic air contaminants and the additional air quality mitigation measures added to address the Project's identified significant and unavoidable air quality impacts.

SHUTE MIHALY & WEINBERGER LLP (R-NOW) LETTER O-8

COMMENT O-8.15

A. The DEIR Does Not Identify All Sources of Toxic Air Contaminants.

While the DEIR assumed the use of diesel generators during construction and accounted for those emissions in the analysis, the DEIR makes no reference to the existence of diesel generators (back-up or otherwise) in the day-to-day operations of the future warehouse facilities. Diesel generators are a fairly typical piece of equipment at warehouse facilities. If diesel generators were intentionally not

included in the operations emissions calculations, it should be noted and there should be a requirement prohibiting their use at any facility in the Specific Plan area and the means to ensure compliance should be detailed. If diesel generators are not going to be prohibited, their omission from the emissions calculations is a substantive oversight which renders the emissions calculations inaccurate and the conclusions of the Health Risk Assessment (HRA) incorrect as well.

RESPONSE O-8.15

Please see the response to Letter A-8.4 and A-8.9 (SCAQMD). Additionally, please see the Final EIR, Project AQIA and the Project HRA for analysis of emissions from potential emergency generators, including the application of MM-AQ-24.

COMMENT O-8.16

B. The DEIR Does Not Identify the Extent and Severity of Air Quality and Greenhouse Gas Emissions Impacts Before Mitigation.

In numerous instances, the DEIR determines that the Project may have significant impacts, but then fails to describe the extent and severity of those impacts prior to implementation of measures designed to reduce the impact. For example, the DEIR indicates that the Project could expose sensitive receptors to substantial pollutant concentrations and a HRA was completed. See DEIR at 4.2-32. The HRA determined that the residential land use with the greatest potential exposure to Specific Plan Area operational-source DPM emissions is an existing residence at 20620 Iris Canyon Road. The DEIR asserts that with the application of Project Design Feature PDF-AQ-2 (the requirement for all-electric cargo-handling equipment), the maximum incremental cancer risk attributable to the Project at this location would not exceed SCAQMD's significance threshold and the impact would therefore be less than significant. Id. The HRA also assumed the inclusion of PDF-AQ-2 for the analysis of the incremental cancer risk from DPM for preschool students at Grove Community Church, which resulted in a less than significant conclusion. See DEIR at 4.2-33.

These conclusions cannot stand for two reasons. First, under CEQA, when evaluating the significance of a project's impacts, an EIR may not "compress the analysis of impacts and mitigation measures into a single issue." Lotus v. Department of Transportation (2014) 223 Cal.App.4th 645, 656. By assuming the implementation of Project design features as part of the Project, the EIR here did just that. The DEIR's failure to evaluate the health impacts of DPM emissions in the area with greatest potential exposure prior to mitigation violates CEQA. And in so doing, it failed to recognize the Project's potential to result in significant air quality impacts to sensitive receptors. Without an accurate significance finding, the DEIR cannot adequately identify mitigation for the impact. As in Lotus, the EIR's failure to evaluate the significance of the Project's impacts separately from what is effectively its proposed mitigation (implementation of project design features) results in a flawed analysis.

More specifically, by conflating impacts and mitigation, the EIR fails to consider whether there may be other, more effective mitigation options, thereby omitting information necessary for the informed decision-making and public participation that CEQA requires. See id. at 658; see also San Franciscans for Reasonable Growth v. City & County of San Francisco (1984) 151 Cal.App.3d 61, 79 (EIR is inadequate if it fails to identify feasible mitigation measures). Further, a finding of significance is required to trigger the agency's obligation to include enforceable mitigation, as well as a monitoring program. When an

EIR relies on project design features as de facto mitigation, this crucial part of the CEQA process is unlawfully omitted. See Lotus, 223 Cal.App.4th at 656-57.

RESPONSE O-8.16

The comment states that the project design feature requiring all electric cargo handling equipment should be classified as a mitigation measure and that the Project HRA should not have included it. The referenced PDF is now MM-AQ-18. Please see the Final EIR and Project HRA for discussion and analysis of diesel-powered cargo equipment and implementation of MM-AQ-18.

COMMENT O-8.20

The JPA should also consider the possibility of a mitigation fund. For instance, The World Logistics Center project in Moreno Valley was required to create a fund to mitigate project impacts on affected residents, schools, places of worship, and other community institutions by retrofitting buildings on their properties. The fund was used to retain a contractor to retrofit/install HVAC and/or air filtration systems, doors, dual-paned windows, and sound- and vibration-deadening insulation and curtains on properties impacted by the project. Additionally, since the County of Riverside will be enforcing all operational and most construction phase requirements, all project requirements should meet or exceed County of Riverside standards to avoid conflicts.

RESPONSE O-8.20

The World Logistics Center Final EIR identified significant and unavoidable health impacts to neighboring residents. Mitigation under the FEIR included installation of air filtration systems at two houses. The settlement agreement mitigation fund expanded the eligible residences to 126 homes. Here, the Project HRA assessed the Project's health risks. At R11 (971 Saltcoats Drive), the maximally exposed individual receptor (MEIR), the maximum incremental cancer risk attributable to Project construction-source DPM emissions is estimated at 4.57 in one million without mitigation and 0.56 in one million with mitigation, both of which are less than the SCAQMD significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01 with and without mitigation, which would not exceed the applicable threshold of 1.0.

For unmitigated operations, the residential land use with the greatest potential exposure to Project operational-source DPM emissions is Location R2 (20351 Camino Del Sol). At the unmitigated MEIR, the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 4.55 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be ≤0.01, which would not exceed the applicable significance threshold of 1.0. At the mitigated MEIR -R12 (20620 Iris Canyon Road), the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 2.23 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0.

The nearest school is the preschool located at Grove Community Church (Location R8), the maximum incremental cancer risk impact attributable to Project construction without mitigation is calculated to be 0.44 in one million, and 0.05 in one million with mitigation, both of which are

less than the significance threshold of 10 in one million. The maximum incremental cancer risk impact attributable to Project operations without mitigation is calculated to be 0.65 in one million and with mitigation is calculated to be 0.33 in one million, both of which are less than the significance threshold of 10 in one million. At this same location, non-cancer risks attributable to Project construction and operations were calculated to be <0.01 with and without mitigation, which would not exceed the applicable significance threshold of 1.0. Unlike the World Logistics Center, the Project would result in less than significant human health or cancer risks.

The World Logistics Center Final EIR also identified significant and unavoidable construction and operational noise impacts to neighboring residents. Noise insulation mitigation was not proposed in the Final EIR for that project. The settlement agreement mitigation fund included noise insulation for approximately 74 of the surrounding homes. Here, the Project Noise Study analyzed the Project's construction and operational noise impacts. The impact analysis is based on quantifiable thresholds and relies on existing regulations to reduce impacts. The Project would have less than significant impacts due to construction noise, and no mitigation is required. The Project includes PDF-NOI-1 through PDF-NOI-4, which would limit the hours of construction and blasting and drilling activities, thereby further reducing the Project's construction noise and vibration impacts. Although Project Design Features are already part of the Project, they will also be included as separate conditions of approval and will be included in the MMRP. The Project would have less than significant impacts due to construction noise and no mitigation is required. With regard to on-site operational noise, the Draft EIR determined the Project would have less than significant noise impacts to all noise-sensitive receiver locations. The Project's traffic noise would exceed the applicable threshold for Roadway Segment #13, (Cactus Avenue east of Meridian Parkway), a non-sensitive industrial area. All other roadway segments would experience off-site traffic noise level impacts that are considered less than significant. Unlike the World Logistics Center, the Project would have less than significant noise impacts to surrounding residences.

The World Logistics Center Final EIR further identified significant and unavoidable air quality impacts due to construction equipment exhaust and fugitive dust even after the implementation of mitigation. The settlement agreement mitigation fund included exterior pressure washing for the first two rows of surrounding homes. Here, the Project AQIA determined the Project would have less than significant construction air quality impacts with implementation of MM-AQ-1 through MM-AQ-4. Unlike the World Logistics Center, the Project would have less than significant construction air quality impacts with mitigation incorporated to surrounding residences.

COMMENT O-8.28

CEQA requires a discussion of the environmental impacts, both direct and indirect, of the proposed project in combination with all "closely related past, present and reasonably foreseeable probable future projects." Guidelines § 15355(b); see also Pub. Res. Code § 21083(b); Guidelines §§ 15021(a)(2), 15130(a), 15358. The discussion of cumulative impacts must "reflect the severity of the impacts and the likelihood of their occurrence," Guidelines § 15130(b), and must document its analysis with references to specific scientific and empirical evidence. Mountain Lion Coalition v. Cal. Fish & Game Comm'n, 214 Cal.App.3d 1043, 1047, 1052 (1989). A legally adequate cumulative impacts analysis views a particular project over time and in conjunction with other related past, present, and reasonably foreseeable future projects whose impacts might compound or interrelate with those of the project at hand. "Cumulative impacts can result from individually minor but collectively significant projects taking place

over a period of time." CEQA Guidelines § 15355(b). Cumulative impacts analysis is necessary because "environmental damage often occurs incrementally from a variety of small sources [that] appear insignificant when considered individually, but assume threatening dimensions when considered collectively with other sources with which they interact." Communities for a Better Env't v. Cal. Res. Agency (2002) 103 Cal.App.4th 98, 114.

Here, the analysis of cumulative impacts in the DEIR is inadequate. First, the list of reasonably foreseeable future projects considered in the DEIR is under-inclusive, especially in light of the potential geographic scope of certain potentially significant impacts. Specifically, the DEIR analysis fails to consider millions of square feet of proposed warehouse facilities, commerce centers, and business parks in the region in addition to the proposed Project. A summary of the proposed projects and estimated square footage of the facilities is provided below:

[summary omitted]

Together, these projects will result in hundreds of acres of ground disturbance, millions of square feet of new warehouse, business park and industrial uses, and thousands of truck trips, all of which will contribute significantly to impacts related to traffic, public safety, air quality, greenhouse gas emissions, public health impacts, and noise. When the impacts from the proposed Project are added to existing impacts and to impacts from all of the cumulative proposed projects, residents living in the surrounding communities are likely to face even greater exposure to traffic congestion, air pollution, and increasing health risks. In underrepresenting the cumulative conditions and proposed warehouse activity in the surrounding area, the DEIR fails to disclose and analyze the severity of the Project's contributing impact to these cumulative harms.

RESPONSE O-8.28

Please see the Final EIR and Project AQIA for an expanded discussion and analysis of cumulative conditions and impacts. As explained in the Project AQIA, the cumulative geographic context for air quality impacts is the South Coast Air Basin (SCAB). Because the "millions of square feet of proposed warehouse facilities, commerce centers, and business parks in the region" mentioned by the commenter are located within the SCAB, they are considered as part of the air quality analysis for the Project, since these projects are subject to CEQA and would all be required to implement mitigation measures as part of the uniform CEQA review process. The emissions presented in the Final EIR represent static worst-case opening year conditions. Because passenger vehicle and truck emissions standards continue to improve, it is expected that emissions would continue to decrease with each year. As a result of implementation of USEPA's Exhaust Emission Standards for Heavy-Duty Highway Compression Ignition Engines and Urban Buses and CARB's Truck and Bus Regulation, truck DPM emission factors have been reduced by 96% and NO_x emission factors have been reduced by 87% between 2000 and 2023. Similarly, DPM emissions from TRUs have been reduced by 68% from 2000 to 2023, and with CARB's amendments to the TRU ATCM are expected to be reduced further by 81% between 2023 and 2040.

COMMENT O-8.36

Inadequate Evaluation of Project Design Features

The DEIR includes Project Design Feature (PDF) AQ-1 that requires all offroad equipment used during construction meet the California Air Resources Board Tier 4 Final emission standards or better (page

1-7). Like a mitigation measure, implementation of Tier 4 Final emissions standards under PDF-AQ-1 would reduce the project's air pollutant emissions and associated air quality impacts. The DEIR included the use of Tier 4 final emission standards under PDF-AQ-1 in the analysis of the project's unmitigated air quality impacts. Based on the Lotus v. Department of Transportation (223 Cal. App.4th 645) decision, the DEIR should be revised to first evaluate the project's air quality impacts without implementation of PDF-AQ-1, and then evaluate the effectiveness of PDF-AQ-1 to reduce air quality impacts.

RESPONSE O-8.36

Please see the Final EIR and Project AQIA, which evaluate Project impacts with and without the inclusion of PDF-AQ-1, which is identified now as MM-AQ-1. The use of Tier 4 Final equipment is now required under MM-AQ-1.

COMMENT O-8.37

Emergency Generators

The DEIR does not discuss if emergency generators would be required to operate the proposed warehouses in the event of a power loss. In our professional experience, warehouse facilities typically include at least one stand-by emergency generator. Therefore, the DEIR should be revised to discuss the potential need for emergency generators and estimate the associated air pollutant emissions and health risks from annual maintenance and testing of the generators.

RESPONSE O-8.37

Please see the response to Letter A-8.4 and A-8.9 (SCAQMD). Additionally, please see the Final EIR, Project AQIA and the Project HRA for analysis of emissions from potential emergency generators, including the application of MM-AQ-24.

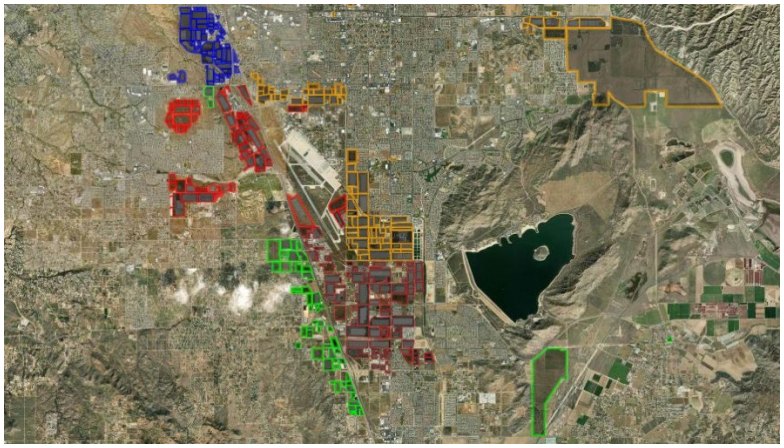
COMMENT O-8.38

Cumulative Health Risks

Based on a study prepared by the Riverside Neighbors Opposing Warehouses, there are about 280 existing and planned warehouses located in the project vicinity along the I-215 highway corridor (Figure 2). These warehouses would generate about 90,000 truck trips daily. Based on review of aerial images, most of the existing warehouses were built in the last 15 years.

In 1996, Caltrans verified that trucks travelling along I-215 at the I-60 junction accounted for about 12.3 percent of the total daily traffic volume. In 2020, Caltrans estimated that the total average annual daily traffic volume along I-215 at the I-60 junction was about 353,000 vehicles per day. The additional truck traffic volume from the 280 existing and planned warehouses in the project vicinity could account for up to about 25.5 percent of the total daily traffic volume. This is a significant increase in the volume of diesel trucks travelling along I-215 in recent years.

Figure 2. Existing and Planned Warehouses in Project Vicinity



Notes: Warehouse shown are color-coded by jurisdiction.

Source: https://radicalresearch.shinyapps.io/MarchJPA/.

There are residential neighborhoods adjacent to I-215 that are exposed to the emissions of diesel particulate matter from the exhaust of trucks travelling along the highway corridor. The DEIR provides no analysis of the cumulative health risks to the nearby residential communities along I-215 from truck trips generated by the project and existing and planned warehouses in the project vicinity.

It is the lead agency's responsibility to ensure cumulative health risks are adequately evaluated. The U.S. Environmental Protection Agency's guidance for air toxic analyses at the community-scale level considers a cancer risk of 100 in a million or less to be within the "acceptable" range of cancer risk. This is a common cumulative threshold that is considered by other lead agencies in California, such as the City of San Francisco. Given the surrounding and the nature of the proposed project, the DEIR should be revised to evaluate the cumulative health risks to nearby residences due to the high volume of diesel truck traffic that would be generated by the project and the heavy density of existing and planned warehouses in the project vicinity.

RESPONSE O-8.38

The comment requires the EIR use the U.S. Environmental Protection Agency's guidance for air toxic analyses at the community-scale level, which considers a cancer risk of 100 in a million or less to be within the "acceptable" range of cancer risk.

Please see the Final EIR and Project HRA for expanded discussion and analysis of cumulative health risk impacts, including along the Project's truck routes, and cumulative cancer risk utilizing the U.S. EPA's threshold of 100 in a million or less requested by the comment.

COMMENT O-8.39

Consistency with 2022 CALGreen

The DEIR briefly discusses the 2019 California Green Building Standards Code (CALGreen) (page 4.7- 23) but does not reference the current 2022 CALGreen code that went into effect on January 1, 2023, and fails to mention any of the mandatory electric vehicle (EV) and photovoltaic (PV) infrastructure requirements that apply to non-residential structures such as business parks and warehouses. The EV and PV infrastructure requirements under 2022 CALGreen are some of the most impactful provisions for proposed developments to reduce GHG emissions.

According to 2022 CALGreen, for non-residential projects with more than 200 parking spaces, at least 20 percent of the spaces must be EV Capable, and 25 percent of those spaces must be equipped with Level 2 Electric Vehicle Supply Equipment. CALGreen also includes voluntary measures organized into two tiers (Tier 1 and Tier 2) that go beyond the minimum EV infrastructure requirements. Under 2022 CALGreen, new office developments must provide a minimum PV system of 2.59 watts per square foot (W/ft^2) of floor area, retail 2.62 W/ft^2 of floor area, and warehouses 0.39 W/ft^2 of floor area.

The DEIR includes MM-GHG-7 (page 4.7-42), which requires the installation of circuitry and capacity for a minimum of 20 EV charging stations consistent with the County's Climate Action Plan. The DEIR does not identify how many parking spaces will be included in the project design, but assuming there will be at least 200 spaces, then the 20 EV Capable spaces required under MMGHG- 7 are substantially below the minimum 20 percent requirement described under 2022 CALGreen.

The DEIR also includes PDF-GHG-1 (page 1-7), which requires the installation of a conduit in logical locations that would allow for the future installation of charging stations for electric trucks. This design feature is vague and fails to provide adequate performance standards to assure that the project will be designed to comply with 2022 CALGreen.

The DEIR includes MM-GHG-1 (page 4.7-41), which requires the installation of a PV system that will generate at least 30 percent of the building's power requirements. However, the DEIR fails to evaluate if this measure is adequate to meet the PV system requirements described under 2022 CALGreen. As an example, Table 1 shows that the estimated PV system size for one of the proposed business parks would need to provide about 58 percent of the building's electricity demand to meet the 2022 CALGreen requirements. Therefore, implementation of MM-GHG-1 would be inadequate to satisfy the requirements of 2022 CALGreen.

Table 1. CALGreen 2022 PV System Design Requirements for a Project Business Park

Land Use	Size (ft^2)[A]	Electricity Demand (kWh/year)[B]	2022 CALGreen PV System Design Requirements[C]				
			PV Capacity Factor (W/Ft^2)	PV System Size (kW)	Annual Solar Activity Factor for Riverside (kWh/kW)[D]	Annual PV System Generation (kWh)	Percent of Building Energy Use
Business Park	1,280,403	12,272,774	3.13	4,008	1,790	7,173,714	58%

Notes: ft^2 = square feet; W = watts; kW = kilowatts; kWh = kilowatt hours
[A] DEIR page 1-5.
[B] DEIR Appendix F Energy, page 43.
[C] 2022 California Energy Code, Title 24, Section 140.10.
[D] Sunwatts, 2023. Solar Hours Per Day. https://sunwatts.com/calculate-how-much-solar/. Accessed on March 3.

RESPONSE O-8.39

The proposed Project would be required to meet or exceed the applicable Title 24 and CALGreen code in place at the time of building permit submittals. As further discussed in Response O-8.40, PDF-GHG-1 requires conduit be installed in truck courts in logical locations that would allow for the future installation of charging stations for electric trucks, in anticipation of this technology becoming available. MM-AQ-11 requires demonstration that main electrical supply lines and panels have been sized to support 'clean fleet' charging facilities, including heavy-duty and delivery trucks when these trucks become available. Further, the Project will comply with the

requirements of Section 5.106.5.4.1 (Electric vehicle readiness requirements) of the CALGreen Code. MM-GHG-7 has been revised to require each site plan to provide circuitry, capacity, and equipment for EV charging stations in accordance with the nonresidential voluntary Tier 2 standards of the 2022 CALGreen Code.

COMMENT O-8.40

Carbon Neutrality

In accordance with Executive Order B-55-18, California is committed to achieving carbon neutrality by 2045. The primary sources of GHG emissions from the project would be from building energy use and transportation; therefore, the DEIR should have evaluated if the project can be designed to ensure it will achieve carbon neutrality by 2045. The DEIR should be revised to evaluate the feasibility and effectiveness of installing EV parking and PV infrastructure beyond the minimum requirements of 2022 CALGreen to reduce the project's GHG emissions and align the project with California's long-term climate goal of carbon neutrality by 2045.

RESPONSE O-8.40

As discussed in the Project GHG Analysis, the Project would not impede the State's progress towards carbon neutrality by 2045 under the 2022 CARB Scoping Plan.

In response to this comment, MM-GHG-7 was revised to require compliance with the 2022 CALGreen Nonresidential Voluntary Tier 2 measures for EV chargers and infrastructure. This results in the following changes to the EV chargers and infrastructure for Buildings B and C (both of which have site plans included in the EIR).

Building	Total Parking Spaces	2022 CALGreen Required EV Capable Spaces	2022 CALGreen EVCS (EV Capable Spaces Provided with EVSE)	2022 Tier 2 EV Capable Spaces	2022 Tier 2 EVCS
B	545	109	28	246	82
C	306	62	16	138	46

A majority of the GHG emissions associated with the Project are emitted by passenger cars and trucks visiting the Project, as well as building energy usage. MM-GHG-12 requires each Project site plan demonstrate implementation of measures sufficient to attain a minimum of 100 points under the County of Riverside CAP. Under PDF-AQ-1, no development within the Specific Plan Area will utilize natural gas. MM-GHG-1 requires installation of a rooftop solar photovoltaic system sufficient to generate at least 100% of the building's power requirements, or the maximum permitted by the Riverside County Airport Land Use Commission. MM-AQ-6 requires all buildings to achieve the 2023 LEED Silver certification standards or equivalent, at a minimum. MM-AQ-8 requires all TRU loading docks provide electrical hookups and all loading docks designed to be compatible with SmartWay trucks. PDF-GHG-1 requires conduit be installed in truck courts in logical locations that would allow for the future installation of charging stations

for electric trucks, in anticipation of this technology becoming available. MM-AQ-11 requires demonstration that main electrical supply lines and panels have been sized to support 'clean fleet' charging facilities, including heavy-duty and delivery trucks when these trucks become available. Further, the Project will comply with the requirements of Section 5.106.5.4.1 (Electric vehicle readiness requirements) of the CALGreen Code. MM-GHG-7 requires each site plan shall provide circuitry, capacity, and equipment for EV charging stations in accordance with Tier 2 of the 2022 CALGreen Code. MM-AQ-24 prohibits the use of diesel back-up generators, unless absolutely necessary.

MM-AQ-20 requires all heavy-duty trucks (Class 7 and 8) domiciled at the project site are model year 2014 or later from start of operations, and shall expedite a transition to zero-emission vehicles, with the fleet fully zero-emission by December 31, 2030 or when feasible for the intended application, whichever date is later. MM-AQ-20 further requires tenants utilize a "clean fleet" of vehicles/delivery vans/trucks (Class 2 through 6) as part of business operations as follows: For any vehicle (Class 2 through 6) domiciled at the project site, the following "clean fleet" requirements apply: (i) 33% of the fleet will be zero emission vehicles at start of operations, (ii) 65% of the fleet will be zero emission vehicles by December 31, 2026, (iii) 80% of the fleet will be zero emission vehicles by December 31, 2028, and (iv) 100% of the fleet will be zero emission vehicles by December 31, 2030 or when feasible for the intended application, whichever date is later. In response to comments, MM-AQ-20 has been revised to clarify applicable definitions and the factors March JPA will consider in determining the measure's feasibility as the Project site is developed. MM-AQ-18 requires the use of only electric service yard trucks (hostlers), pallet jacks and forklifts, and other on-site equipment, with necessary electrical charging stations provided and requires inclusion of this restriction in lease agreements. MM-AQ-20 also encourages tenants to become SmartWay partners, if eligible.

These emissions would continue to be reduced as the passenger car and truck fleets become increasingly electrified in future years, and as sales of GHG-emitting cars and trucks are phased out by 2035 in accordance with CARB's Advanced Clean Cars II regulations. Additionally, GHG emissions from Project buildings will continue to be reduced as California's electrical grid shifts to electrical generation sources that do not emit GHG in future years.

The March JPA has imposed all feasible mitigation measures on the Project that will reduce GHG impacts and will not impede the State's progress to carbon neutrality by 2045.

COMMENT O-8.41

ALTERNATIVE ANALYSIS

Page 4.2-28 of the DEIR identified a significant and unavoidable impact related to operational-source emissions of criteria air pollutants. The primary source of operational emissions is from mobile sources (e.g., passenger cars and trucks). The DEIR did not summarize or evaluate the contribution of each proposed land use to the project's overall mobile emissions.

In general, a warehouse development generates a relatively high number of both passenger car and heavy-duty truck trips that result in substantially higher air pollutant emissions than an office development of a similar size. For example, Table 2 summarizes the estimated mobile emissions of

nitrogen oxides (NOx) from an office versus a warehouse development of the same size (100,000 square feet). As shown in Table 2, the warehouse generates over three times as much NOx emissions per day from mobile sources than the office.

The DEIR alternative analysis should be revised to provide a detailed analysis of how proposing more office or other land use types than warehouses would help to substantially reduce the mobile emissions and associated severity of air quality impacts from the proposed project.

Table 2. Estimated Mobile NOx Emissions for an Office Versus a Warehouse

Land Use	Vehicle Type	Trips/KSF[A]	Size (KSF)	Total Trips	Miles per Trip[B]	Daily VMT	NOx EF (g/mi)[C]	NOx Emissions (g/day)
Office	Passenger	11.06	100	1,106	20	22,120	0	818
Warehouse	Passenger	11.87	100	1,187	20	23,740	0	878
	Truck	0.57	100	57	32	1,824	1	1,687

Notes: KSF = thousand square feet; VMT = vehicle miles travelled; NOx = nitrogen oxides; EF = emission factor; g = grams; mi = miles.

[A] DEIR Appendix N Transportation, Table 4-1: Calculated Trip Generation Rates, page 62.

[B] DEIR Appendix C-1 Air Quality Technical Report. Back calculated from trip distance from CalEEMod results.

[C] California Air Resources Board, 2023. EMFAC2021 version 1.0.2, Onroad Emission Rates for Riverside County in the summer of 2023 for gasoline-powered passenger cars (LDA) and diesel-powered trucks (MHDT). https://arb.ca.gov/emfac/emissions-inventory/. Accessed on March 3.

RESPONSE O-8.41

As discussed in the Project AQIA, operational emissions were evaluated based on the land uses identified in the Specific Plan buildout scenario, including area sources, energy use, mobile sources, TRU sources, on site equipment sources, and stationary sources.

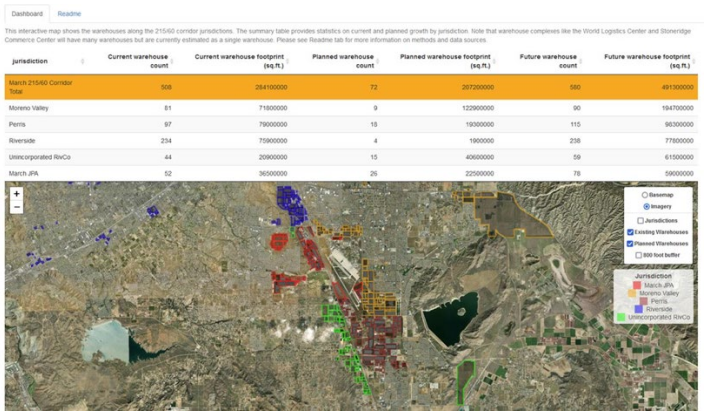
Project Alternative 5 analyzes business park use development instead of warehouse land uses. The potential impacts under Alternative 5 were analyzed under a separate memo, which concluded that this scenario would result in greater air quality and GHG impacts compared to the proposed Project, but reduced health and cancer risk impacts. Further, as noted in Response O-8.40, above, California is aggressively promoting the adoption of zero emission trucks and passenger vehicles which would significantly reduce emissions each year as fleets and passenger vehicles eliminate emissions.

M. McCARTHY LETTER I-68

COMMENT I-68.2

Attached please find a link to a website displaying the warehouses and planned warehouses along the 215/60 corridor surrounding March ARB.

https://radicalresearch.shinyapps.io/MarchJPA/



Please include this as part of public comment on the draft EIR indicating the proper domain for regional cumulative impacts effects analyses performed within the EIR. The existing list of projects on Table 4-2 within the draft EIR omits over 3,500 acres of approved and planned warehouse projects within the region. The draft EIR omissions are material; proper inclusion of these projects would demonstrate that transportation impacts are significant and unavoidable, and air quality impacts are substantially greater than claimed.

RESPONSE I-68.2

Please see the Project AQIA for an expanded discussion and analysis of cumulative conditions and impacts. Please see the Revised EIR and Project HRA for expanded discussion and analysis of cumulative health risk impacts, including along the Project's truck routes, and cumulative cancer risk utilizing the U.S. EPA's threshold. As discussed in the Final EIR and Project AQIA, because the proposed Project would exceed the project-level regional significance thresholds for emissions of VOCs, NO_x, CO, and PM_{10}, the Project's cumulative impacts with respect to such emissions would be considerable and significant. However, as discussed in briefs filed in the case of *Sierra Club v. County of Fresno* (2018), SCAQMD noted that it may be "difficult to quantify health impacts for criteria pollutants." SCAQMD used O_3 as an example of why it is impracticable to determine specific health outcomes from criteria pollutants for all but very large, regional-scale projects. First, forming O_3 "takes time and the influence of meteorological conditions for these reactions to occur, so ozone may be formed at a distance downwind from the sources." Second, "it takes a large amount of additional precursor emissions (NOX and VOCs) to cause a modeled increase in ambient ozone levels over an entire region," with a 2012 study showing that "reducing NOX by 432 tons per day (157,680 tons/year) and reducing VOC by 187 tons per day (68,255 tons/year) would reduce ozone levels at the SCAQMD's monitor site with the highest levels by only 9 parts per billion." Additionally, the San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD) ties the difficulty of correlating the emission of criteria pollutants to health impacts to how ozone and particulate matter are formed, stating that "[b]ecause of the complexity of ozone formation, a specific tonnage amount of NOX or VOCs emitted in a particular area does not equate to a particular concentration of ozone in that area." Similarly, the tonnage of PM "emitted does not always equate to the local PM concentration because it can be transported long distances by wind," and "[s]econdary PM, like ozone, is formed via complex chemical reactions in the atmosphere between precursor chemicals such as sulfur dioxides (SOX) and NOX," meaning that "the tonnage of PM-forming precursor emissions in an area does not

necessarily result in an equivalent concentration of secondary PM in that area." The disconnect between the amount of precursor pollutants and the concentration of ozone or PM formed makes it difficult to determine potential health impacts, which are related to the concentration of ozone and PM experienced by the receptor rather than levels of NOX, SOX, and VOCs produced by a source.

It should be noted, however, that as detailed in the Final EIR and in the Project AQIA, the LST analysis performed for the proposed Project demonstrates that neither Project construction nor Project operation would exceed the applicable localized significance thresholds established by SCAQMD. Therefore, the Project would not be expected to exceed the most stringent applicable federal or state ambient air quality standards for emissions of CO, NO_x, PM_{10}, or $PM_{2.5}$.

M. SILVEOUS LETTER I-71

COMMENT I-71.5

Your Greenhouse Gas (GHG) section claims that your development will have a net positive effect because local community members will have less of a commute driving to work.

RESPONSE I-71.5

The Project GHG Analysis does not conclude that the Project would have a net positive effect on GHG emissions but rather concludes that with implementation of mitigation measures, the proposed Project would not conflict with any applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions. As such, with mitigation the Project would be expected to have a less than significant impact with regard to GHG emissions but would not result in a net reduction in GHG emissions.

COMMENT I-71.7

On what did you base your VMT?

RESPONSE I-71.7

See Response O-3.9 on how the Project relates to regional consistency with the applicable transportation plan and how the Project's long-term employment goals facilitate efficiencies in employment growth and associated travel.

COMMENT I-71.8

How did you create the traffic models assuming 21-mile commutes would be shortened to 16?

RESPONSE I-71.8

The comment appears to be misinterpreting the information presented in Section 4.2, Air Quality, of the Draft EIR on Page 4.2-23. The discussion notes that for passenger vehicles, the historic CalEEMod default for the trip length is approximately 16.6 miles – however for analytical purposes, the CalEEMod 2022 model defaults were utilized which identify a weighted average of

approximately 20 miles. Therefore, the traffic model did not assume 21-mile commutes would be shortened to 16 miles.

M. SILVEOUS LETTER I-73

COMMENT I-73.5

Your analysis does not take into account the cumulative impacts of adjacent industrial developments that will be in various stages of construction during the project construction phase of this project. For example, the Sycamore Hills project, multiple Meridian South Campus buildings, the World Logistics Center, the Stoneridge Commerce Center, and dozens of others. Please include these impacts in both the local and regional analysis for the final EIR.

RESPONSE I-73.5

Please see the Project AQIA for an expanded discussion and analysis of cumulative conditions and impacts. Please see the Project HRA for expanded discussion and analysis of cumulative health risk impacts, including along the Project's truck routes, and cumulative cancer risk utilizing the U.S. EPA's threshold of 100 in one million. The World Logistics Center and Stoneridge Commerce Center are both located more than 10 miles away from the Project site. As explained in the Project AQIA, the SCAQMD thresholds used by March JPA represent the level above which emissions would be considered cumulatively significant and were developed based on regional air quality in the SoCAB. Because of this, all development, including the warehouses mentioned by the commenter, were accounted for in the analysis.

COMMENT I-73.6

The project also failed to properly measure the impact of Transport Refrigeration Units which typically idle for hours at a facility. We ask that the air quality and health-risk assessment be re-evaluated to properly account for the proposed cold-storage warehouse location, its much higher estimated emissions, and the impacts on the community of this type of high-intensity development.

RESPONSE I-73.6

As explained in the Project AQIA, Project HRA and Final EIR, the analysis conservatively accounted for TRU emissions that would occur during on- and off-site travel, as well as at loading docks. Under unmitigated conditions, the analysis conservatively assumed that each TRU would idle on-site for approximately 2.1 hours and, under mitigated conditions, each TRU would idle for 30 minutes while on-site but not at the loading dock. However, the emissions and risk presented in the analysis represents a worst-case scenario in which improvements in technology and emissions standards are not realized (see Project HRA, which identifies a static Year 2028 emission factor year is utilized). Because the 2022 amendments to the TRU ATCM, CARB has required that fleets steadily turn over their TRUs to zero-emission units, with the turnover to zero-emission TRUs is required by 2029. Given that the analysis assumed that emission factors would remain constant based on a 2028 opening year, incorporation of the 2022 amendments would result in long-term risk lower than what is reported in the analysis. However, these emissions are accounted for in the Project AQIA, Project GHG Analysis, and Project HRA, which consider emissions from TRUs that would occur while operating at loading docks, traveling on the site, as

well as on surrounding roadways docks. Emissions were calculated using the latest emission factors obtained from EMFAC 2021 and are consistent with SCAQMD methodology.

COMMENT I-73.7

Finally, we ask that the project applicant apply the conservative AQMD rule 2305 weighted average truck trip rates, rather than the very optimistic ITE projections. Given the speculative nature of these warehouses, we believe it is important to be more conservative in truck trip rate projections - using the Rule 2305 numbers would almost double the daily truck trips.

RESPONSE I-73.7

The analysis relies on the trip rates presented in the Project traffic study, which has been reviewed and approved by the RCTLMA. The trip rates presented in the Project traffic study are based on ITE rates and the SCAQMD High-Cube Warehouse Truck Trip Study, which are based on surveys of similar facilities. As such, DPM emissions from trucks are not understated in the analysis. See UXR Traffic Response I-831.7 detailing the development and intended application of the Rule 2305 weighted average truck trip rates.

Notwithstanding, as shown in UXR Traffic Response I-831.7, even if the SCAQMD's method and recommended trip rates were utilized, this would only result in an additional 52 daily truck trips (2,106 vs 2,054). This represents an approximate potential 2.53% increase in truck trips and consequently emissions and risk. Even if the health risk estimates disclosed in the Project HRA were increased by 2.53%, they would remain less than significant and no new impacts would occur.

COMMENT I-73.8

Also, you have a responsibility to mitigate significant impacts on the surrounding community if possible. The developer of the Slover and Oleander warehouse project in the City of Fontana was compelled to implement several mitigations to reduce the impact on local residents, including installing solar panels so that tenants use 100% solar energy and creating a community benefit fund. At the very least, the Lewis Group should consider mitigations that have already been implemented in other projects in the local area to reduce air quality impacts. Can you explain why these mitigations were not considered in the DEIR for this site?

RESPONSE I-73.8

The air quality and GHG project design features and mitigation measures have been revised and expanded to incorporate additional feasible mitigation in response to comments. Regarding solar, MM-GHG-1 requires rooftop solar photovoltaic (PV) electricity generation sufficient to generate at least 100% of the building's power requirements, or the maximum permitted by the Riverside County Airport Land Use Commission. Regarding a community benefit fund, the Project Development Agreement includes the construction of the Meridian Fire Station and $3.5 million towards the construction of the proposed Park. See the mitigation fund discussion in Response O-8.20, above.

COMMENT I-73.9

We would ask for significant mitigations to be put in place to reduce the impacts on local residents.

1. Require that 40% of the construction vehicles used in the project are battery-electric vehicles (or zero-emission equivalents)

RESPONSE I-73.9

Regarding construction, MM-AQ-1 requires that off-road equipment used during construction shall meet CARB Tier 4 Final emission standards or better. MM-AQ-3 would further reduce the Project's air quality impacts during construction with the following requirements and restrictions:

- No grading shall occur on days with an Air Quality Index forecast greater than 150 for particulates or ozone as forecasted for the project area (Source Receptor Area 23).
- Contractor shall require all heavy-duty trucks hauling onto the project site to be model year 2014 or later. This measure shall not apply to trucks that are not owned or operated by the contractor since it would be infeasible to prohibit access to the site by any truck that is otherwise legal to operate on California roads and highways.
- No construction equipment idling longer than three (3) minutes shall be permitted.
- All construction equipment to be tuned and maintained in accordance with the manufacturer's specifications, with maintenance records onsite and available to regulatory authorities upon request.
- No diesel-powered portable generators shall be used, unless necessary due to emergency situations or constrained supply.
- Contractor required to provide transit and ridesharing information to onsite construction workers.
- Contractor required to establish one or more locations for food or catering truck service to construction workers and to cooperate with food service providers to provide consistent food service.
- Use of electric-powered hand tools, forklifts and pressure washers, to the extent feasible.
- Designation of an area in the construction site where electric-powered construction vehicles and equipment can charge.

The Project AQIA determined the Project would have less than significant construction air quality impacts with implementation of MM-AQ-1 through MM-AQ-4 and addition mitigation is not required. Furthermore, there is no certainty that it would be feasible for 40% of construction vehicles to be battery-electric or zero-emission equivalents at the time of construction.

COMMENT I-73.10

2. Do not allow blasting - the disturbance of dirt, noise, and the potential negative impact on air quality during construction should not be allowed in close proximity to housing.

RESPONSE I-73.10

Regarding blasting, PDF-NOI-2 prohibits blasting within 1,000 feet of any residence or other sensitive receptor.

COMMENT I-73.11

I also ask that you mitigate the impact on air quality by requiring occupants of the warehouses to have a significant percentage of trucks and cars to be electric. This is the least you can do to protect the surrounding community. I am aware that California regulations are supposed to convert trucks to electrical by 2045, but that will only be after decades of pollution poisoning our lungs. I request that a minimum of 50% of delivery vehicles be required to be battery electric vehicles at the project opening data of 2028, increasing to 100% by 2031. I also request that 30% of trucks be battery-electric (or equivalent zero-emission vehicles) by the project start date of 2028.

RESPONSE I-73.11

Regarding fleet electrification, MM-AQ-20 requires all heavy-duty trucks (Class 7 and 8) domiciled at the project site are model year 2014 or later from start of operations, and shall expedite a transition to zero-emission vehicles, with the fleet fully zero-emission by December 31, 2030 or when feasible for the intended application, whichever date is later. MM-AQ-20 further requires tenants utilize a "clean fleet" of vehicles/delivery vans/trucks (Class 2 through 6) as part of business operations as follows: For any vehicle (Class 2 through 6) domiciled at the project site, the following "clean fleet" requirements apply: (i) 33% of the fleet will be zero emission vehicles at start of operations, (ii) 65% of the fleet will be zero emission vehicles by December 31, 2026, (iii) 80% of the fleet will be zero emission vehicles by December 31, 2028, and (iv) 100% of the fleet will be zero emission vehicles by December 31, 2030 or when feasible for the intended application, whichever date is later. In response to comments, MM-AQ-20 has been revised to clarify applicable definitions and the factors March JPA will consider in determining the measure's feasibility as the Project site is developed.

R. PETERS LETTER I-166

COMMENT I-166.16

I have serious concerns regarding blasting as stated in the DEIR (PDF-NOI-2 & 3, page 29, Table 1-2, 4.5 Geology and Soils, page 71 & 72, and numerous other locations in the DEIR), and the Seismic Refraction Study (Section 61 Results and Conclusions, page 3) to Leighton Consulting, related to airborne dust, debris, gases and general hazardous nature of blasting. Has there been any investigation into exploding granite rock, which is known to contain radon gas and other potential hazardous materials to the surrounding community? Have any wind studies been completed over any seasonal periods to see now air borne matter/gases and construction is general should address wind speeds and direction on the surrounding community? Should mitigation measures curtail blasting activities during AQMD recognized unhealthy periods? Should mitigation eliminate blasting as a result of the surrounding residential neighborhoods? Should mitigation require cleaning of surrounding communities windows, solar panels, air filter replacements, etc.,?

RESPONSE I-166.16

The Project AQIA evaluated emissions related to blasting, including both fugitive dust as well as emissions resulting from the use of explosives (see Table 5-2, Table 5-3, Table 5-4, and Table 5-5). The results of the analysis indicate that emissions resulting from blasting activity would be minimal and would result in less than significant impacts. Additionally, the Project would be required to implement dust control measures such as watering that would significantly reduce fugitive dust emissions.

Furthermore, the LST and HRA analysis included in the DEIR are based on historical geographic wind patterns that are input into the dispersion modeling. Therefore, wind speeds and directions in the Project vicinity are considered in the criteria pollutant and HRA dispersion modeling. Additionally, the Project would also be required to comply with the SCAQMD Rule 403 which prohibits grading activities during high-wind events.

It is unknown whether radon is present in the vicinity of the Project site, and if present, the extent to which blasting activities would result in its release. The US EPA classifies Riverside County as Zone 2, indicating a moderate potential for radon.[8] However, radon is typically only a concern in enclosed spaces, such as a building or basement, where it can accumulate over time. Per the US EPA, when outdoors radon disperses rapidly and is generally not a health issue (https://www.epa.gov/radiation/what-radon-gas-it-dangerous). Because blasting will occur in an open area away from any nearby structures, any radon gas that is released would dissipate quickly and would not be able to reach potentially harmful concentrations. Given the distance that blasting would occur from any residential development (over 1,000 feet) and given that it would occur outdoors and not indoors, there would be no impact from radon gas to any residences.

Regarding the comment's requested mitigation, PDF-NOI-2 prohibits blasting within 1,000 feet of any residence or other sensitive receptor. MM-AQ-3 prohibits grading on days with an Air Quality Index forecast greater than 150 for particulates or ozone as forecasted for the Project area (Source Receptor Area 23).

K. WARSINSKI LETTER I-798

COMMENT I-798.2

The report titled "Warehouses, pollution, and social disparities" authored by Torres, Victoria, Klooster, 2021 (https://earthjustice.org/wp-content/uploads/warehouse_research_report_4.15.2021.pdf) shows that asthma rates and cardiovascular disease rates are 5% and 9% higher respectively in areas with warehouses than compared to the state average. Approving projects like these in such close proximity to homes and schools, which contain children and the elderly, should be avoided at all costs. There is no financial benefit to the community or developer that can offset the negative health impacts that

[8] https://www.epa.gov/sites/default/files/2018-12/documents/radon-zones-map.pdf

have been documented and are readily available for review. The Draft EIRS statement the project will have significant and unavoidable air quality impacts sounds benign, but what it really means is if the project is approved, my children's and my neighbor's children's risk of developing asthma and cardiovascular disease are greatly increased.

RESPONSE I-798.2

As explained in the Project AQIA, air dispersion modeling was performed to analyze pollutant concentrations at nearby sensitive receptors, and the analysis indicates that pollutant concentrations would remain well below the applicable SCAQMD localized significance thresholds during Project construction and operation. Additionally, the Project HRA indicated that cancer and non-cancer risk to nearby sensitive receptors would be well below the applicable SCAQMD significance thresholds during construction and operation.

The City of Perris prepared a study titled "Air Quality, Greenhouse Gas Emissions, and Environmental Noise Conditions Study for Industrial Developments" in July 2022. As seen in the table below taken from the study, none of the 20 warehouse projects approved in the last 20 years had significant health risk impacts.

REPRESENTATIVE WAREHOUSE PROJECTS
APPROVED IN THE CITY OF PERRIS SINCE 2010

Project	Size (square feet)	Significant Impacts After Mitigation				
		Regional Construction Emissions	Regional Operational Emissions	Construction LST	Operational LST	Health Risks
Optimus Logistics Center	1,455,781	No	**Yes**	No	No	No
IDI Rider 2 & 4	1,352,736	**Yes**	**Yes**	No	No	No
Rados Distribution Center	1,191,080	**Yes**	**Yes**	No	No	No
Duke at Perris & Markham	1,189,860	No	**Yes**	No	No	No
Optimus Logistics Center 2	1,037,811	No	**Yes**	No	No	No
Integra Perris Distribution Center	864,000	No	**Yes**	No	No	No
Duke at Patterson & Markham	811,620	No	**Yes**	No	No	No
Duke at Indian and Markham	668,681	No	**Yes**	No	No	No
Pelican Industrial	600,000	No	No	No	No	No
IDI - Indian and Ramona Warehouse	428,730	No	No	No	No	No
Perris Gateway Commerce Center	380,000	No	No	No	No	No
First Industrial at Rider & Redlands	324,147	No	No	No	No	No
First Industrial Warehouse at Wilson	303,228	No	No	No	No	No
Perris and Morgan Industrial Park	286,179	No	No	No	No	No
IPT Perris DC III Western/Nandina	251,504	No	No	No	No	No
Core5 Rider Business Center	248,483	No	No	No	No	No
First Perry Logistics	241,000	No	No	No	No	No
Walnut and Indian Industrial	205,830	No	No	No	No	No
First Harley Knox Industrial	154,250	No	No	No	No	No
First Industrial Warehouse 2 at Wilson	154,558	No	No	No	No	No

M. McCARTHY LETTER I-827

COMMENT I-827.3

The draft EIR Air Quality section (sections 4.2 and Appendices C1, C2) systematically underestimates the air quality and health risk impacts to the community and region. It fails to evaluate cumulative impacts on both local and regional scales and engages in a series of flawed assumptions that demonstrably underestimate cumulative health risk. As a PhD atmospheric scientist from UC Berkeley with 20 years of experience in health risk assessment1,2,3 and data analysis examining gradients in near-road pollution near-roadways4,5,6,7,8, I am astonished at the chained underestimates of the risk to human

health made within this planning document. I ask that these deficiencies be addressed to accurately the cumulative effects of warehouse development in our region on human health, rather than minimize the potential dangers of yet more transportation related pollution on our roads, freeways, and in our communities that are already disproportionately impacted by the second largest cluster of warehouses in the region.

RESPONSE I-827.3

Please see the Project AQIA and Final EIR for an expanded discussion and analysis of cumulative conditions and impacts. Please see the Project HRA for expanded discussion and analysis of cumulative health risk impacts, including along the Project's truck routes, and cumulative cancer risk utilizing the U.S. EPA's threshold of 100 in one million. The cumulative air quality impacts were evaluated and were not underestimated.

COMMENT I-827.4

The overall project health risk assessment (HRA) exhibits a systemic bias in evaluating cancer risk through a series of individual decisions that all bias the results lower than a comprehensive analysis. Cumulatively, these choices display a callous disregard for the residents of the area and the true health-risk that will be experienced by residents. The HRA

a. omits adjacent projects and regionally cumulative truck impacts to the 215 freeway from the analysis (undercounts emissions)

b. omits toxic air contaminants from consideration other than diesel PM (undercounts hazard)

c. omits the proposed park as a sensitive receptor site despite children exercising directly adjacent to warehouses (neglects evaluation of sensitive receptors in closest proximity to emissions)

d. drastically undercounts the truck trip rates, diesel PM emissions, and TRU idling associated with the 725,000 SF high-cube fulfilment center and the 500,000 SF cold-storage warehouse by omitting its own indicated 'east-side' dock doors from Appendix C2 – Table 2-4.

e. omits the cumulative health risks of the multi-pollutant mixture of mobile-source project related pollution other than diesel PM. The pollutants of benzene, formaldehyde, acetaldehyde, 1,3-butadiene, chromium, nickel, and naphthalene from mobile sources should be included as they are cumulatively important to total risk levels, especially given the high relative ratios of passenger vehicles to heavy-duty trucks from fulfillment center warehouses (e.g., Figure 4-7, MATES V).

RESPONSE I-827.4

a. Please see the Project HRA and Final EIR for expanded discussion and analysis of cumulative health risk impacts, including along the Project's truck routes, and cumulative cancer risk utilizing the U.S. EPA's threshold of 100 in one million.

b. The comment states that the HRA omits toxic air contaminants from sources other than DPM. While passenger vehicles would also emit toxic air contaminants, because the passenger vehicle fleet is predominantly gasoline powered, and TAC emission rates from gasoline engines are significantly lower than diesel engine TAC emission rates, the TAC emissions generated by heavy duty trucks result in significantly more risk. As such, no additional substantive health risk impacts would occur as a result of TAC emissions

generated by passenger vehicles. Please see Response RA-6.3 for an expanded discussion of gasoline emissions and health risk assessments. Consistent with industry standards, the focus of the HRA is on diesel exhaust as the primary TAC that has the propensity to affect receptors in the vicinity of the Project. All other TACs that may result from passenger vehicles would not generate a greater risk, and in fact, would represent a fraction of the risk for diesel exhaust. Furthermore, the International Agency for Research on Cancer (IARC), which is part of the World Health Organization (WHO), has classified diesel engine exhaust as "carcinogenic to humans" (Group 1) based on sufficient evidence of its carcinogenicity to humans. This classification is in contrast to gasoline engine exhaust, which is classified as "probably carcinogenic to humans" (Group 2A) due to limited evidence in humans.[9]

c. See Response A-9.12, above.

d. The comment states that the analysis undercounts truck trip rates, diesel PM emissions, and TRU idling by omitting 'east-side' loading docks for the remaining Industrial parcel. As part of this Project, there are only site plans for Buildings B and C. However, for modeling purposes, the analysis assumed buildings on the remaining parcels and placed dock doors and loading areas in compliance with the development standards in the proposed Specific Plan. The number of idling trucks and TRUs is based on the Project Traffic Analysis and the building square footage, not the number of loading docks, thus the number of loading docks or dock doors would not affect the analysis. The comment makes the inaccurate assumption that the 500,000 square feet of cold storage and 725,600 square feet of high-cube fulfillment center warehouse would be two separate buildings on the remaining industrial parcel. The modeling assumed 3 industrial buildings – Buildings B and C and one on the remaining industrial parcel.

   The analysis accounts for the possibility that, while the allowed square footages on each parcel would remain the same, the ultimate uses (cold storage or high-cube fulfillment) could shift. The Project HRA is consistent with the Project Traffic Analysis, which only breaks out truck trips for Buildings B and C (both of which have proposed site plans). The remaining truck trips are split between high-cube cold storage warehouse, remaining industrial: high-cube fulfillment, business park warehouse, and business park mixed-use land uses. Additionally, because it is not known at this time in which buildings the high-cube cold storage warehouse uses would be placed, these truck trips were allocated between Buildings B, C, and the one building on the remaining industrial parcel based on the square footage for each building, proportional to the overall cold storage space allowed. As such, it is expected that the truck trip rates vary for each building based on the intended use of the building and allocation of cold storage trips. The analysis accounts for all daily truck trips identified in the analysis, and the manner in which these are apportioned between the various buildings would not alter the results of the analysis.

e. Please see Response I-827.4.b above. Please see the Project AQIA and Final EIR for an expanded discussion and analysis of cumulative conditions and impacts. Please see the

[9] https://www.iarc.who.int/wp-content/uploads/2018/07/FAQ_English-Mono105-1.pdf

Project HRA and Final EIR for expanded discussion and analysis of cumulative health risk impacts, including along the Project's truck routes, and cumulative cancer risk utilizing the U.S. EPA's threshold of 100 in one million.

COMMENT I-827.5

The Project regional air quality analysis omits local vicinity and regional projects that are cumulatively considerable and of importance. The project near-field air quality analysis excludes more than 60 existing warehouses totaling over 20 million square feet within a few miles of the project. The project regional analysis of NOx, PM2.5, and ozone excludes the regional cumulative impact of over 100 million square feet of existing warehouses and the planned/approved impact of another 75 million+ square feet along the I-215 and SR-60 corridors. These warehouses have largely been approved by March JPA and its member agencies and must be evaluated and disclosed within the regional impacts.

RESPONSE I-827.5

Please see the Project AQIA and Final EIR for an expanded discussion and analysis of cumulative conditions and impacts. Please see the Project HRA and Final EIR for expanded discussion and analysis of cumulative health risk impacts, including along the Project's truck routes, and cumulative cancer risk utilizing the U.S. EPA's threshold of 100 in one million.

COMMENT I-827.6

The HRA omits known emissions sources from past, present, and probable future warehouses that I believe would contribute significant additional carcinogenic risk from both diesel PM and other mobile source air toxics (see bullet 2a below).

a. The HRA omits dozens of nearby existing warehouses and under construction warehouses from the model (see next section and cumulative impacts letter) – which cumulatively add thousands of every extra idling trucks around our community. These are not included in the Appendix C2 HRA.

b. The HRA omits many surrounding truck routes from the HRA – compare Appendix N – Exhibit 2-C included below and the Truck Route maps (JPA #21-02, City of Riverside, County of Riverside) which cumulatively include tens of thousands of trucks and passenger vehicles emitting pollution.

i. March JPA Truck routes (Meridian, Van Buren, Krameria)

ii. ii. City of Riverside Truck routes (Alessandro Blvd)

iii. County of Riverside Truck routes (Brown Street)

iv. the I-215 freeway and State Route 60 freeway

c. The HRA omits the construction of South Barton Road from its emissions domain (see Appendix C2 – Exhibit 2-A) which is a few hundred feet from a preschool with vulnerable young children.

d. The HRA omits the construction activities and installation of a water tank from its emission domain (see Appendix C2- Exhibit 2-A) which is fewer than fifty feet from adjacent homes.

RESPONSE I-827.6

a. Please see the Project HRA and Final EIR for expanded discussion and analysis of cumulative health risk impacts, including along the Project's truck routes, and cumulative cancer risk utilizing the U.S. EPA's threshold of 100 in one million.

b. Please see the Project HRA and Final EIR for expanded discussion and analysis of cumulative health risk impacts, including along the Project's truck routes, and cumulative cancer risk utilizing the U.S. EPA's threshold of 100 in one million.

c. As shown in revised Exhibit 2-A of the Project HRA, the analysis placed construction sources within 80 feet of the Grove Preschool (represented by Receptor R8), and the modeling conservatively assumed that construction would occur at these locations for the entire 4.35-year duration of Project construction, although construction on the southern Barton extension adjacent to the preschool would take place over a significantly shorter period of time.

d. As shown on the revised Exhibit 2-A of the Project HRA, the closest sensitive receptor (Receptor 11) is 32 feet from construction activities, specifically the northern Barton Street extension and the Mixed Use parcels of the Specific Plan Area. Even with analyzed exposure of 4.35 years of construction emissions, the mitigated construction health risk at Receptor R11 is 0.56 in one million, well below the SCAQMD significance threshold of 10 in one million. As noted in the Final EIR and Project HRA, TACs generally dissipate with distance from the source. The homes along Grove Community Drive and Barton Drive in the vicinity of the offsite water tank construction and waterline installation would not be exposed to construction source emissions to the extent or duration compared to Receptor R11 – _the mitigated construction health risk would be below 0.56 in one million. Offsite construction would occur over a significantly shorter duration than construction of the Project itself. As such, since the mitigated construction health risk at Receptor R11, the maximally exposed individual receptor (MEIR), is well below the SCAQMD significance threshold, the Project will not cause a significant human health or cancer risk to nearby residences from any on-site or off-site construction activity.

COMMENT I-827.7

The HRA omits known carcinogens that add significant health risk emitted from Project construction and operational activities from its hazard assessment.

a. The SCAQMD Figure ES-2 in MATES V clearly indicates only 50% of cancer risk in the basin is attributable to diesel PM; other named significant contributors are all emitted directly or indirectly by mobile sources identified as nationally significant contributors to cancer risk

i. Benzene
ii. 1,3-butadiene
iii. Acetaldehyde
iv. Formaldehyde
v. Naphthalene
vi. Ethylbenzene

vii. polycyclic aromatic hydrocarbons (PAHs)).

b. Therefore, basing a health-risk assessment on heavy-duty truck emissions alone will significantly underestimate total carcinogenic health-risk from the project by at least 50%.

RESPONSE I-827.7

The Project HRA analyzes impacts from all construction and operational activities. While 50% of cancer risk in the basin may be attributed to DPM emissions, this does not mean that the remaining 50% is attributable to passenger vehicle emissions as stated in the comment. Stationary sources, including power plants, refineries, manufacturing facilities, boilers, and gas stations are also significant contributors to basin-wide cancer risk. As such, the analysis does not significantly underestimate risk as stated in the comment. . Additionally, please see Response I-827.4.b above which explains the minimal contribution of toxics from gasoline vehicles and the Project HRA for additional information.

COMMENT I-827.8

The HRA doesn't include the proposed Park as a sensitive receptor in its analysis, despite clear guidance from the CARB handbook, WRCOG, City, and County of Riverside Good Neighbor Guidelines that all define parks as sensitive receptors. The proposed 60-acre park is situated less than 100 feet across the street from four warehouses, and less than 500 feet from a major arterial and an arterial highway. It is less than 800 feet from the industrial warehouse loading docks. Given that the children using this park will be exercising, their increased respiration rate will increase the dose of carcinogenic exposure from the adjacent warehouses emissions.

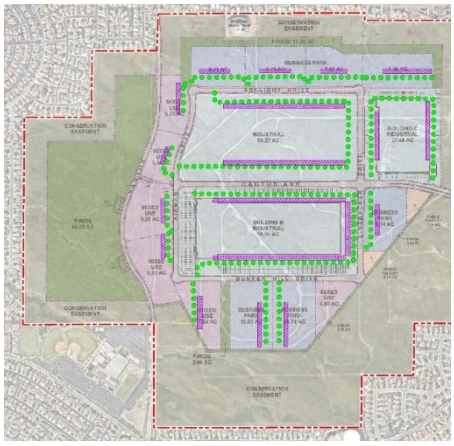
RESPONSE I-827.8

Please see Response A-9.12, above.

COMMENT I-827.9

The HRA botches its modeled operational on-site emissions for the industrial warehouses in Appendix C2.

a. Exhibit 2-B clearly shows a map of the old site plan. This Exhibit does not match the reported Dock doors and truck idling rate locations in Appendix C2 – Table 2-4 for the Building 'A'. First, the incorrect number of business park buildings are shown, indicating that emissions locations for buildings D-K (7 buildings) are not consistent with the current site plan for the project. More importantly, dock door locations for Building A should have dock doors to the north, east, and south. The Table 2-4 only shows dock doors in two orientations (104 idling trucks north and south for A).



b. The truck emissions for 'Building A' and Building B in Appendix C-2 Table 2-4 are incorrect. Building A should have the highest number of truck and the highest emissions of diesel PM according to the truck trip estimates in Table 4.15-1 (474 truck trips for building B, 222 truck trips for building C, and 652 truck trips for 'Building A' (376 + 276 for high-cube and remaining industrial) combined. However, Appendix C-2 Table 2-4 shows that Building A has 418 Trucks per day, Building B has 640 trucks per day, and Bldg C has 290 trucks per day. This underestimates diesel PM on-site emissions by at least 22%.

c. As noted in my transportation comment letter and shown in Table 1, the truck trip rates used in the analysis are far lower than the SCAQMD 2305(d)1(C) weighted average truck trip rates and likely underestimate daily heavy-duty truck trips by a factor of 2. This is yet another underestimate in the same direction that lowers the HRA estimates. This again underestimates diesel PM emissions by 100%. Using the SCAQMD Rule 2305 WTTR values results in a more than doubling of truck trips for the project. That would seem to suggest that the default truck trip rates from ITE and WRCOG are likely to be underestimates of true truck trip rates.

		Truck Emission Rates	
Source	Trucks Per Day	VMT [a] (miles/day)	Truck Emission Rate [b] (grams/mile)
On-Site Idling - Bldg A North	104		
On-Site Idling - Bldg A South	104		
On-Site Idling - Bldg B North	107		
On-Site Idling - Bldg B East	107		
On-Site Idling - Bldg B South	107		
On-Site Idling - Bldg C West	73		
On-Site Idling - Bldg C East	73		
On-Site Idling - Bldg D	31		
On-Site Idling - Bldg E	39		
On-Site Idling - Bldg F	39		
On-Site Idling - Bldg G	39		
On-Site Idling - Bldg H	39		
On-Site Idling - Bldg J	30		
On-Site Idling - Bldg K	39		
On-Site Idling - Bldg MJ 98k North	18		
On-Site Idling - Bldg MJ 77k	15		
On-Site Idling - Bldg MJ 131k	25		
On-Site Idling - Bldg MJ 98k South	18		
On-Site Idling - Bldg MJ 110k	21		
On-Site Travel - Bldg A	418	378.92	0.0178
On-Site Travel - Bldg B	640	604.16	0.0178
On-Site Travel - Bldg C	290	157.68	0.0178
On-Site Travel - Bldg D	62	9.68	0.0178
On-Site Travel - Bldg E	78	11.91	0.0178
On-Site Travel - Bldg F	78	11.82	0.0178
On-Site Travel - Bldg G	78	13.05	0.0178

Table 2-4 from Appendix C2

Table 1. Contrasting the truck-trip rates from SCAQMD vs. the Project ITE based truck trip rates.

	Warehousing	High-cube fulfillment center	Cold storage	Total
total trip rate	12.44	2.129	2.12	
passenger trip rate	11.87	1.75	1.37	
Truck rate per TSF (Project)	0.57	0.379	0.75	
Rule 2305 truck rate per TSF	0.67	0.95	2.17	
Difference in truck rate	0.1	0.571	1.42	
Cumulative warehouse sq.ft.	1763168	2617000	500000	4880168
Current truck trips	1005	992	375	2372
Extra daily truck trips	176	1494	710	2381

d. Therefore, someone failed to accurately transcribe the truck trips from the Building A and Building B in the correct location and quantity. As a result the modeled diesel PM emissions are incorrectly located and the number of idling TRUs is underestimated and generated incorrectly. Correctly reallocating trucks will change both the location and magnitude of emissions from the diesel PM trucks by at least 20%.

e. The project excludes off-site emissions from multiple nearby truck routes and the I-215 freeway which is almost exactly 0.75 miles from the nearest homes in the neighborhood. Given that over 20,000 trucks traverse that roadway daily, almost all of which are attributable to warehouses, it is important to include this facility in the off-site emissions health risk assessment. It is absurd to include Cactus Avenue in Moreno Valley but exclude the I-215 freeway, Van Buren, Alessandro, Brown Street, and Krameria Avenue.

RESPONSE I-827.9

a. As noted by the comment, the health risk assessment in the Draft EIR evaluated 1,763,168 square feet of business park use on seven business park parcels. After the original analysis was run, the site plan was changed slightly to distribute the same square footage of business park use onto 10 separate parcels. The Recirculated EIR disclosed the unmitigated operational health risk would be 5.26 in one million at the MEIR (R3). In response to recirculation comments, the Project HRA was revised to analyze warehouse buildings on each of the 10 Business Park parcels. The Project HRA confirms that the unmitigated operational risk was reduced from 5.26 in one million to 4.55 in one million as a result of this change.

   The comment further questions the analysis's placement of loading docks for the remaining Industrial parcel. There is currently no site plan proposed for the remaining Industrial parcel and the source configuration is simply conceptual for analytical purposes and shows loading docks on the northern and southern side of this modeled area in compliance with the development standards in the proposed Specific Plan. Emissions from on-site idling and on-site travel were included for the entirety of the Specific Plan Area. Notwithstanding, even if the configuration of the loading docks were different, there would be no change in the risk calculations due to the distance to the nearest receptor locations.

b. The truck trip estimates provided in the Project Traffic Analysis only break out truck trips for Buildings B and C, both of which have proposed site plans, and the remaining truck trips are split between high-cube cold storage warehouse, remaining industrial: high-cube fulfillment, business park warehouse, and business park mixed-use land uses. The analysis accounts for the possibility that, while the allowed square footages on each parcel would remain the same, the ultimate uses (cold storage or high-cube fulfillment) could shift. Because it is not known at this time in which buildings the high-cube cold storage warehouse uses would be placed, these truck trips were allocated between Buildings B, C, and the one building on the remaining industrial parcel based on the square footage for each building, proportional to the overall cold storage space allowed. As such, it is expected that the truck trip rates vary for each building based on the intended use of the building and allocation of cold storage trips. As such, a total of 418 truck trips were assigned to the remaining Industrial parcel (276 trips from the remaining industrial: high-cube fulfillment use and 142 trips from the high-cube cold storage warehouse land use). Additionally, TRU usage was assumed to take place at Buildings B, C, and the remaining Industrial parcel based on the cold storage truck trips assigned to each building. Because all truck trips presented in the Project Traffic Analysis are accounted for in the Project HRA, diesel particulate emissions were not undercounted in the analysis. The analysis accounts for all daily truck trips identified in the analysis, and the manner in which these are apportioned between the various buildings would not alter the results of the analysis.

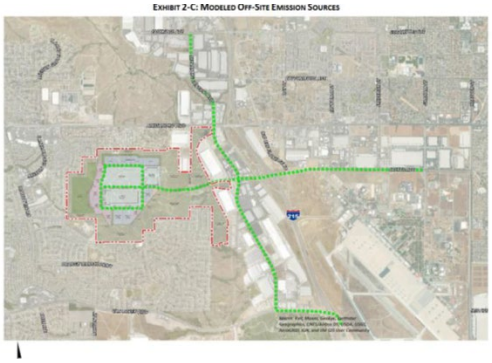
c. See UXR Traffic Response I-831.7 detailing the development and intended application of the Rule 2305 weighted average truck trip rates. The analysis utilized truck trips presented in the Project Traffic Analysis and more accurately represents the specific land uses proposed by the Project. As such, DPM emissions from trucks are not understated in the analysis. See Response I-73.7, above.

d. Please see Responses I-827.9.a and I-827.9.b above. Additionally, as the Project HRA footnotes, "Exhibit 2-B visually overstates the extent of warehousing allowed in the mixed-use parcels within the Project's Specific Plan so as to evaluate the 'worst-case' impacts at each sensitive receptor." As shown, the HRA's modeling is overly conservative and currently overstates the potential loading docks and trucking activity that are expected to occur on-site.

e. Please see the Project AQIA for an expanded discussion and analysis of cumulative conditions and impacts. Please see the Project HRA for expanded discussion and analysis of cumulative health risk impacts, including along the Project's truck routes, and cumulative cancer risk utilizing the U.S. EPA's threshold of 100 in one million.

COMMENT I-827.10

The combination of the undercounted emissions sources (at least 50 warehouses and associated idling trucks; at least 4 truck routes and a freeway), inadequate modeling domain, omission of carcinogens, and omissions of locally important sensitive receptors is leading to a cumulative misrepresentation of the cumulative project health-risk on the community. I estimate that the combined synergy of these effects will at least quadruple the diesel PM emissions. Adding in the missing carcinogens will basically double the cancer risk again. Cumulatively, I believe this will exceed the 10-in-a-million cancer risk threshold. Additionally, I note later in the errata section that the choice of the Riverside Municipal Airport wind rose will also systematically bias the results low; the Perris Valley station is more representative of the higher elevation West Campus Upper Plateau winds.



The March JPA Health Risk Assessment is significantly underestimating cumulative cancer risk. I ask that the March JPA justify and revise its health risk assessment.

1) Justify the omission of nearby approved and planned projects from construction phase HRA impacts.

2) Justify the omission of the surrounding truck routes from the modeling domain, especially Van Buren, Krameria, Brown St. Alessandro, and the 215 freeway.

3) Justify omitting the operational warehouse impacts (i.e., existing truck idling and car traffic from March JPA warehouses) from the HRA during the construction phase of the Project's warehouses. The residents are exposed to both the existing operational emissions and the construction phase emissions, not just the latter.

4) Justify the omission of known mobile source related pollutants from the HRA, given their significant contributions to cancer risk in the South Coast Air Basin and nationally.

5) Justify omitting the park from the set of sensitive receptors, given its proximity to the warehouses. I would hope that the health of the children exposed to the emissions from your project are of utmost importance, rather than a mere oversight.

6) Justify the incorrect table of models and inadequate modeling of TRU emissions by failing to accurately transcribe the truck trips to the correct buildings in the health risk assessment.

7) Justify omitting walking trails and passive recreation areas from the list of sensitive receptors in your analysis – these trails are required to be open and are intended for community use yet are completely omitted as a possible location for micro-exposures.

RESPONSE I-827.10

1) Please see the Project AQIA for an expanded discussion and analysis of cumulative conditions and impacts. Please see the Project HRA for expanded discussion and analysis of cumulative health risk impacts, including along the Project's truck routes, and cumulative cancer risk utilizing the U.S. EPA's threshold of 100 in one million. There are several valid reasons why nearby approved and planned projects from construction phase HRA are not included:

    a. Uncertain Construction Timing and Duration: The specific timing and duration of nearby approved and planned projects may not be known or could be subject to change. Since health risk assessments are time-sensitive and construction schedules can be fluid, it would be inappropriate to speculate on the stacking of risks without accurate information. Risk assessments need to be based on concrete data and reliable projections.

    b. Source-Receptor Relationship: Health risk assessments are typically conducted based on a source-receptor relationship, where the emission source (e.g., diesel construction equipment) and the exposed receptor (e.g., residential area or sensitive population) are well-defined and quantifiable. Including nearby projects that are in various stages of approval or planning could introduce uncertainties in identifying the specific emission sources and receptors relevant to the assessment.

    c. Variability in Source-Receptor Location: The location of receptors (e.g., residential areas, schools, workers) in relation to different emission sources can vary significantly. Each construction project may have a unique spatial distribution of potential receptors, and the stacking of risks without precise data could lead to misleading conclusions. Relying on speculative assumptions could undermine the accuracy and reliability of the health risk assessment.

    As such, omitting nearby approved and planned projects from the construction phase diesel health risk assessment is a prudent approach to ensure the assessment remains accurate, focused, and compliant with regulatory requirements. The potential uncertainties and speculative nature of including such projects could undermine the reliability and relevance of the assessment's findings. Instead, assessments should be

based on available data and established source-receptor relationships for the specific construction project under consideration.

2) Please see the Project AQIA for an expanded discussion and analysis of cumulative conditions and impacts. Please see the Project HRA for expanded discussion and analysis of cumulative health risk impacts, including along the Project's truck routes, and cumulative cancer risk utilizing the U.S. EPA's threshold of 100 in one million.

3) Please see the Project AQIA for an expanded discussion and analysis of cumulative conditions and impacts. Please see the Project HRA for expanded discussion and analysis of cumulative health risk impacts, including along the Project's truck routes, and cumulative cancer risk utilizing the U.S. EPA's threshold of 100 in one million. Also see Response I-827.10.1, above.

4) The Project HRA does not omit known mobile source related pollutants. Please see the Project AQIA for an expanded discussion and analysis of cumulative conditions and impacts. Please see the Project HRA for expanded discussion and analysis of cumulative health risk impacts, including along the Project's truck routes, and cumulative cancer risk utilizing the U.S. EPA's threshold of 100 in one million. Also see Response I-827.4.b, above, which discusses why health risk assessments focus on DPM.

5) See Response A-9.12.

6) See Response I-827.9.

7) Air quality sensitive receptor locations are places where people spend significant amounts of time and are, therefore, more vulnerable to potential air pollution exposure. Walking trails and recreational areas are typically not considered sensitive receptor locations for several reasons, one of which is the minimal time spent by individuals at these places. People typically visit walking trails and recreational areas for short periods, often for leisure or exercise purposes. Unlike residential or workplace locations where individuals spend a considerable portion of their day, the time spent on walking trails and recreational areas is limited. As a result, the potential exposure to air pollution is significantly reduced compared to sensitive locations where people reside or work. The Project AQIA's LST analysis evaluates potential short-term or micro exposures to criteria air pollutants and determined that impacts were less than significant.

COMMENT I-827.11

Immediate Vicinity – Health Risk Analysis Omissions

Multiple warehouse projects are planned/approved and under construction surrounding the Project. The Air Quality construction analysis omits these nearby projects from the cumulative analysis of construction emissions and omits the operational impacts of existing warehouse truck and car traffic during the construction phase. Figure 1 shows the immediate vicinity of the project with approved and planned projects. Multiple other warehouses are likely to be under construction or operational during the construction phase of this project. There are over 100 million square feet of existing warehouses within 6 miles of the proposed project and there are over 5 million square feet of approved and under construction warehouses within 3 miles of the project. I detail the full list of projects in the Cumulative Impacts Letter but wanted to specifically identify those impacts on air quality for this section.

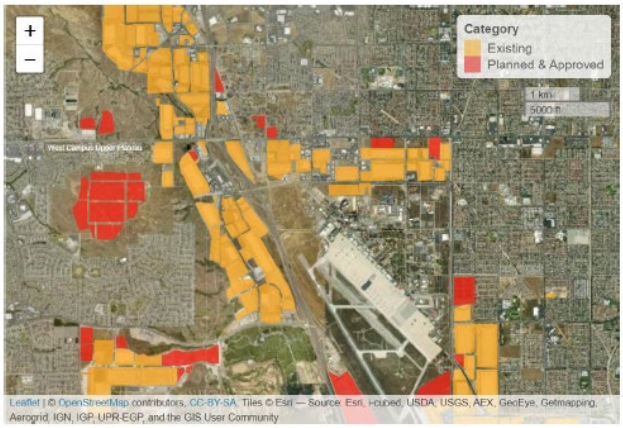


Figure 1- Proposed project (West Campus Upper Plateau) within the context of existing (brown) and approved/planned warehouses within a few miles of the project site.

Given that the projects cumulative impacts are cumulatively considerable when considered within the context of additional construction and operational diesel PM and other toxic air contaminant impacts (formaldehyde, acetaldehyde, benzene, naphthalene, 1,3-butadiene, ethylbenzene, and polycyclic aromatic hydrocarbons), it is important to include these localized impacts in the air quality and health-risk analyses. Therefore, I ask that the March JPA

1) Justify excluding construction emissions from Sycamore Hills Distribution center, Buildings E, F, G, and 1 in the South Campus, and Meridian Building West. Other nearby under construction project include buildings H, I, 2, 3 in the South Campus, Old 215, Moreno Valley Commerce Center, the Edgemont Commerce Center, Meridian D1 Aviation Gateway, First March Logistics Project, Oleander Business Park, and Compass Danbe Centerpointe.

2) Justify excluding the operational emissions from trucks along March JPA truck routes in its air quality and health-risk analysis during the construction phase of the West Campus Upper Plateau. Specifically, justify excluding Alessandro Blvd, Meridian Parkway, Brown St., Van Buren and the 215 Freeway from the Health-Risk Analysis and localized air quality analysis during the 2023-2028 construction phase.

3) Demonstrate that the Construction Phase Air Quality thresholds of significance as estimated in Table 4.2-7 are met when including applicable regional construction and operational level impacts surrounding the project in addition to the specific project's impacts. Current estimates fail to include other immediate vicinity and regional projects under construction which will cumulatively impact the project.

RESPONSE I-827.11

Please see the Project HRA for expanded discussion and analysis of cumulative health risk impacts, including along the Project's truck routes, and cumulative cancer risk utilizing the U.S. EPA's threshold of 100 in one million. Additional responses are provided as follows:

1) See Response I-827.10.1, above, as the reasoning provided also applies to cumulative construction emissions.

2) Please see Response I-827.10.1, above, as the reasoning provided also applies to existing operational emissions during the Project construction phase.

3) Please see Responses I-827.11.1 and I-827.11.2, above.

COMMENT I-827.12

Regional Analysis – Regional Air Quality issues – ozone, NO2, and PM2.5

In the regional analysis of cumulative air quality impacts, the scope of the analysis is completely inadequate. As mentioned in the cumulative impacts letter, the Air Quality section's regional scope is the South Coast Air Basin. Even if we limit the scope to merely a 10-mile buffer around the project, the intense scale of warehouse development along the 215/60 corridor is obvious as shown in Figure 2. The existing footprint12 of warehouses is over 280 million square feet. The cumulative additional footprint of approved and planned warehouses in the region is another 207 million square feet, nearly doubling the existing footprint and cumulatively approaching a half a billion square feet devoted to warehouses within 10 miles of this project. The March JPA has 5 million square feet approved and under construction. Moreno Valley has the enormous World Logistics Center contributing over 100 million square feet of warehouse footprint. The County of Riverside has many projects in Mead Valley and the large Stoneridge Commerce Center (~20 million square feet footprint) near Nuevo. The Project's cumulative impact project list omits 90% of this area and projects, deliberately underestimating the regional scale of the past, present, and proposed future projects. Given the regional character of air quality problems in the SCAQMD area, it is important to identify the regional patterns in development that are characterizing the local land-use authority decisions cumulatively.

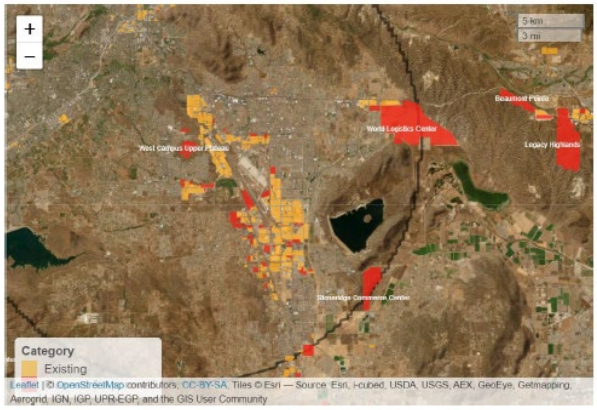


Figure 2 – Regional map of existing, approved, and planned warehouse projects within Riverside County.

The recently approved 2022 Air Quality Management Plan by the South Coast Air Quality Management District describes the joint and individual responsibilities of various agencies in improving air quality regionally. Two types of emissions management are possible – emissions controls and emissions demand management. Figure 1-1 from the AQMP13 indicates the responsible agencies. On the left-hand side, the U.S. Environmental Protection Agency, California Air Resources Board, and South Coast Air Quality Management District are responsible for emissions controls. Tailpipe emissions and local permits are controlled by these agencies.

FIGURE 1-1
ILLUSTRATION OF LOCAL, STATE, AND FEDERAL AGENCIES AND THEIR AUTHORITY OVER EMISSIONS CONTROL TECHNOLOGY OR EMISSIONS DEMAND MANAGEMENT.[8]

On the right-hand side, the land-use agencies are the ones responsible for local emissions demand management. Southern California Association of Governments, individual cities like Riverside, Los Angeles, and Ontario, and joint powers authorities like the March JPA control emissions demand by deciding what types of land-use to allow and the cumulative use of land. As it notes, "Goods movement is a substantial source of smog-forming emissions in our region and the goods movement sector has recently experienced substantial growth in the region. Projections indicate that this expansion will continue. This growth has resulted in surging demand for warehousing, which has fueled the construction of new warehouses in the Inland Empire. Due to the substantial emissions associated with warehouses, it is critical that land use decisions regarding the siting of warehouses consider air quality impacts when approving new projects. While these decisions are typically made at the local level and South Coast AQMD lacks direct regulatory authority over land use, South Coast AQMD recognizes that collaboration across multiple public agencies and cities is required to promote better land use planning in consideration of air quality impacts."

The March JPA, along with its member agencies the City of Riverside, Moreno Valley, Perris, and the County of Riverside, have cumulatively decided to develop the 215/60 corridor almost exclusively for the Goods Movement Sector in a manner that increases the emissions of regional smog-forming pollution by increasing the numbers of vehicles, trucks, planes, and trains. Each individual decision has significantly and unavoidably degraded air quality and conflicted with the AQMP. Cumulatively, it exhibits a pattern of disregard for the air quality for the region given the overwhelming development of projects that conflict with the air quality management plan and undermine the emissions controls of the individual vehicles by adding so many more trucks and passenger vehicles to the roads, despite our worst in the nation air quality. It also induces additional cargo plane flights and goods-movement via locomotives, which have not been modeled or addressed at all in terms of cumulative air quality impacts.

Therefore, I ask that the March JPA

1) Demonstrate that the Operational Phase Air Quality thresholds of significance are not completely understated when including regionally representative operational emissions for the 100 million square feet of warehouses already operational and cumulatively impacting air quality. Please account properly for the additional planned/approved warehouses regionally that will add another 50 million square feet of warehouses as shown in Figure 2. This is important for the regional nonattainment of NO2, ozone, and PM2.5 and the estimated cumulative regional impact.

2) Justify the cumulative decisions of itself and its member agencies in continually ignoring the air quality impacts of its decisions and ignoring their responsibilities for managing emissions in the region by making responsible land-use decisions.

3) Identify how its pattern of land-use planning has been responsible and justified regionally in improving the air quality of its residents.

RESPONSE I-827.12

1) Please see the Project AQIA and the Project HRA for additional operational phase analysis and expanded discussion of cumulative air quality impacts.
2) Please see the Project AQIA for an expanded discussion and analysis of cumulative conditions and impacts. Please see the Project HRA for expanded discussion and analysis

of cumulative health risk impacts, including along the Project's truck routes, and cumulative cancer risk utilizing the U.S. EPA's threshold of 100 in one million.

3) Over the years, the region has shown significant improvement in air quality. While there may be multiple factors contributing to this improvement, land-use planning has played a crucial role in positively impacting air quality and justifying regional improvements for its residents. Some of the key aspects and measures that have been employed by March JPA include:

    a. Smart Growth and Compact Development: Land-use planning has emphasized the development of compact urban centers, encouraging mixed land uses, and reducing urban sprawl. This strategy helps reduce the need for long commutes and encourages active transportation, such as walking and cycling, thereby lowering vehicular emissions.

    b. Improvement of Public Transportation: The region has invested in enhancing and expanding public transportation networks, including buses, trains, and light rail systems. By providing viable alternatives to driving, this strategy reduces the number of vehicles on the road and subsequently cuts down on emissions.

    c. Promotion of Active Transportation: Land-use planning has prioritized the creation of pedestrian-friendly and bike-friendly infrastructure, encouraging residents to opt for walking or cycling for short trips. This reduces the number of short car journeys, which are typically less fuel-efficient and more polluting.

    d. Green Spaces and Urban Forestry: Creating and maintaining parks, green spaces, and urban forests can help absorb pollutants and improve air quality. Land-use planning has incorporated the development and preservation of such areas to mitigate the impact of air pollution.

    e. Energy-Efficient Buildings: Implementing regulations and guidelines for energy-efficient buildings helps reduce energy consumption and subsequently lowers emissions from power plants and other energy sources.

By adopting and implementing these land use planning strategies, the South Coast Air Basin and March JPA have taken significant steps to improve air quality and create a healthier living environment for its residents. The regional justification for these improvements lies in the substantial evidence linking air pollution to various health issues, including respiratory diseases, cardiovascular problems, and other adverse health impacts. Reducing air pollution not only enhances the quality of life for residents but also contributes to long-term economic benefits by lowering healthcare costs and increasing overall productivity. Moreover, improved air quality can attract businesses and tourists to the area, boosting the local economy while fostering a sustainable and environmentally conscious community.

COMMENT I-827.13 - ERRATA

This section includes other observations of errors and questionable assertions by the March JPA and the Project Applicant in its submission.

p.4.2-3 - 2021 data was available as of July 2022 – Table 4.2-1 is out of date.

RESPONSE I-827.13

Please see the Revised AQIA, which presents the latest data available for 2019-2021.

COMMENT I-827.14 - ERRATA

p.4.2-10 – Table 4.2-3. The new proposed PM2.5 24-hr standard is proposed at 9-10 µg/m3 as announced January 6th, 2023.

RESPONSE I-827.14

The comment states that the $PM_{2.5}$ 24-hour standard presented in Table 4.2-3 is outdated. However, the proposed $PM_{2.5}$ standard of 9-10 micrograms per cubic meter was released on January 6, 2023, and has yet to be adopted.

COMMENT I-827.17- ERRATA

I request that offroad equipment include 20% of hours of operation to be battery-electric vehicles – these are feasible as shown here: https://californiacore.org/resources/

RESPONSE I-827.17

Regarding construction, MM-AQ-1 requires that off-road equipment used during construction shall meet CARB Tier 4 Final emission standards or better. The Project AQIA determined the Project would have less than significant construction air quality impacts with implementation of MM-AQ-1 through MM-AQ-4. Additional mitigation is not required for construction air quality impacts.

For operation, MM-AQ-18 requires all cargo handling equipment to be electric requires tenant lease agreements include this restriction.

The comment cites to the Clean Off-Road Equipment Voucher Incentive Project (CORE) website. "The CORE Project was established to reduce price barriers, enabling users to adopt more zero-emission equipment. Created by the California Air Resources Board (CARB) in 2017, CORE provides point-of-sale discount vouchers that reduce the purchase cost of equipment operated in California." This website does not indicate that it is feasible that offroad construction equipment can include 20% of hours of operation to be battery-electric vehicles.

COMMENT I-827.19 - ERRATA

Table 4.2-2 – NO2 is not listed as being in state nonattainment but is, in fact, in state nonattainment along the SR-60 between San Bernardino and Riverside County. Please justify the failure to disclose this nonattainment area that this project will contribute traffic to from the analysis of nonattainment areas.

RESPONSE I-827.19

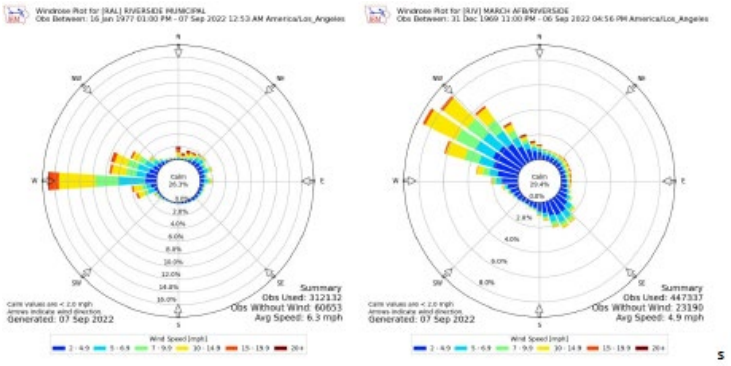
The comment states that the analysis fails to disclose that route SR-60 between San Bernardino and Riverside Counties is in nonattainment for NO_2. Although the Project site is not located in this area and is in attainment for NO_2, the Project AQIA included this information as a footnote to Table 2-3.

COMMENT I-827.20 - ERRATA

4.2-18 – KRAL is almost 8 miles from the project site and nearly 900 feet lower in elevation – March ARB has meteorological data and is less than 1 mile from the project site. As can be seen from a basic check of the runway orientations for the two airports, KRAL is completely inappropriate for use in meteorological dispersion modeling of this project. Winds at Riverside Municipal are channeled along the Santa Ana river valley east-west – its elevation is 820' ASL. March Air Reserve Base is at 1535' ASL and winds are predominantly north-northwest to south-southeast. March Air Reserve Base winds are significantly slower and lower than at RAL, which increases stagnancy and is less effective at dispersion. There is no scientifically valid reason to choose a less representative airport for winds for this project, especially since it will indicate lower pollution impact due to the higher winds and incorrect direction of winds.

Windroses from Riverside Municipal airport and March AFB – both are fully publicly available as ASOS data here: https://mesonet.agron.iastate.edu/sites/windrose.phtml?station=RIV&network=CA_ASOS

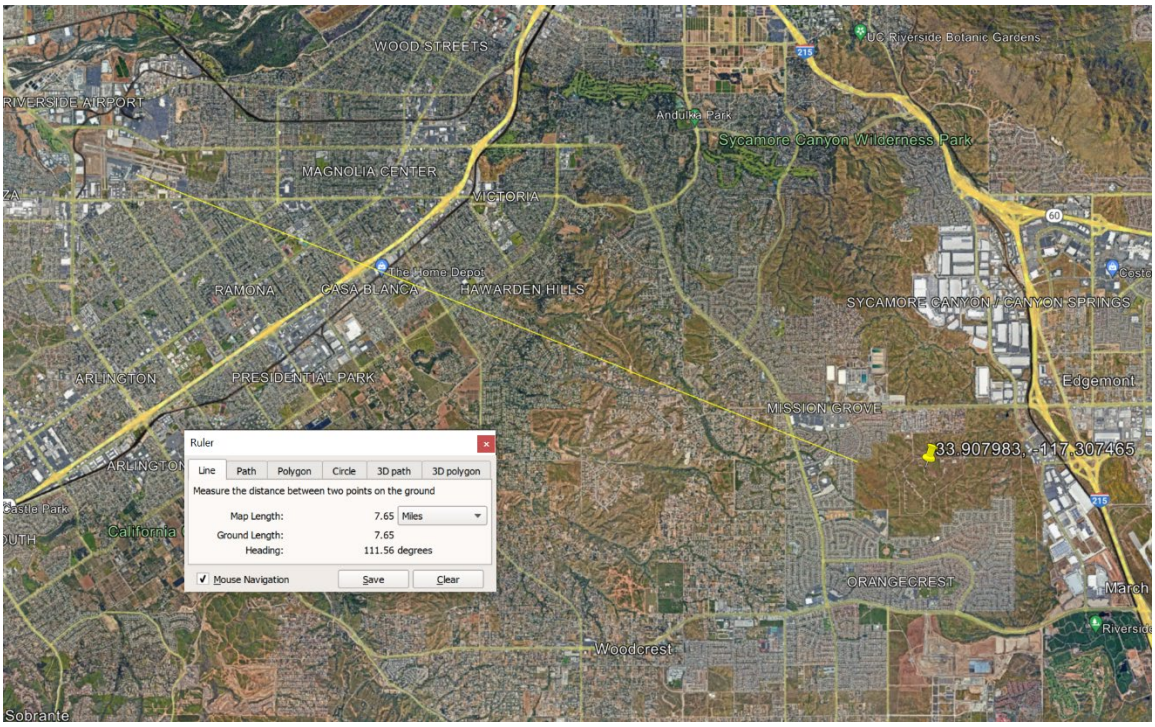
If data from the SCAQMD must be used, the Perris data would be more representative of the local wind field than Riverside Municipal Airport.



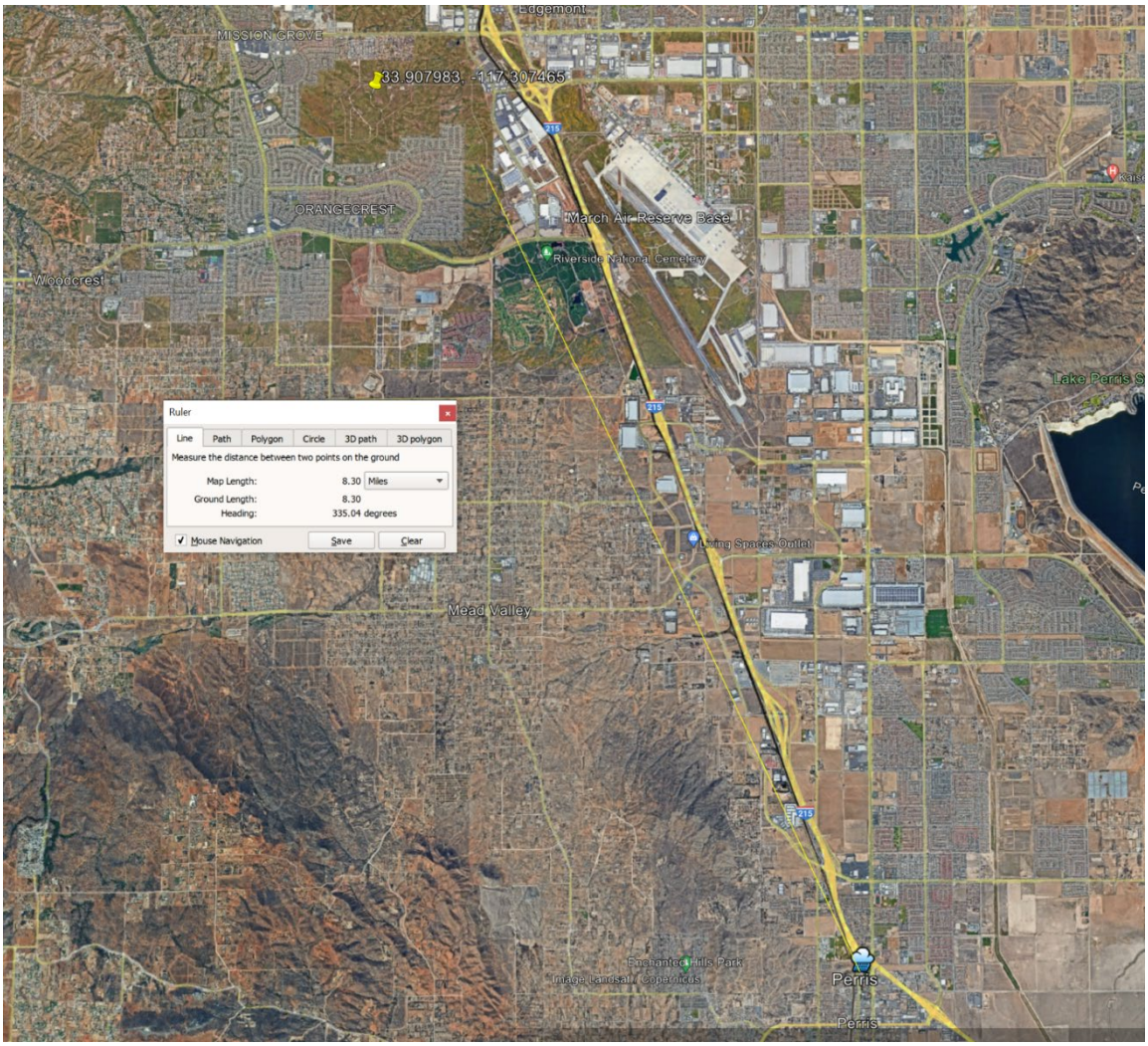
RESPONSE I-827.20

The comment states that the use of meteorological data from Riverside is not appropriate and recommends the use of data from March ARB or Perris. Meteorological data from the SCAQMD's Riverside monitoring station was utilized as this represents the nearest monitoring station to the Project site. As shown below, the Riverside monitoring station is located approximately 7.65 miles from the Project site, while the Perris Valley monitoring station is located approximately 8.30 miles from the Project site. SCAQMD does not provide meteorological data for March ARB. Data from SCAQMD's Perris monitoring site was not used as this location is located further from the Project site. Additionally, the Riverside monitoring station is located in the same source receptor area as the Project (SRA 23) and is closer to the Project, while the Perris monitoring station is located in a different source receptor area (SRA 24) and is farther away. SCAQMD's jurisdiction is divided into several SRAs which reflect areas with similar topography, meteorological conditions, and air quality.

Riverside Monitoring Station (7.65 miles):



Perris Valley Monitoring Station (8.30 miles):



COMMENT I-827.21 - ERRATA

4.2-21 – The current version of AERMOD is 22112 – not 21112 as of June 27, 2022 - https://www.epa.gov/scram/air-quality-dispersion-modeling-preferred-and-recommended-models

RESPONSE I-827.21

The comment states that the analysis used AERMOD version 21112 rather than 22112. As revised, the Project HRA used Lakes AERMOD View (Version 11.2.0) to calculate pollutant concentrations associated with site operations. Lakes AERMOD View incorporates EPA's AERMOD Version 22112.

COMMENT I-827.22 - ERRATA

4.2-23 – Trip length of 20.27 miles for BP and fulfilment center uses for LDV and 32.03 miles for the trucks – SCAG average truck trip distances from 2016 are not justified given the location of this warehouse complex to the average warehouses in the SCAG basin. Please justify using average values

when this project is much further from the Ports of LA/Long Beach and multimodal facilities than most other warehouses. The Streetlight Data indicate that average truck trip lengths for San Bernardino County are currently at 38 miles per trip as provided by San Bernardino County Transportation Authority. Please justify a SCAG default trip length of 32 miles for these trucks given that SCAG includes areas such closer to the primary ports of entry for these types of uses. A County specific number should be used here.

RESPONSE I-827.22

The comment states that the trip distances utilized in the analysis are not appropriate. The passenger vehicle trip lengths utilized CalEEMod defaults, which are based on data from the local MPO/RTPA. Truck trip lengths are based on guidance from SCAQMD in the Rule 2305 Second Draft Staff Report, which recommends the use of a 14.2-mile trip length for class 4-7 trucks (LHDT1/2, MHDT) and 39.9 miles for class 8 trucks (HHDT). As such, a weighted average truck trip distance of 32.03 miles was used based on the assumed fleet mix.

COMMENT I-827.24 - ERRATA

p.4.2-25 – MM-AQ-1 affects VOC levels – the South Coast Air Basin is NOx limited, not VOC limited, so VOC mitigation measures will have no impact at all. NOx control measures are required to meet NAAQS for ozone and NO2. This assertion is 20 years out of date.

RESPONSE I-827.24

As discussed in the Project AQIA, the Project's unmitigated construction emissions exceed the SCAQMD threshold for VOC and NO_x. Implementation of MM-AQ-1 through MM-AQ-4 would reduce the Project's VOC and NO_x emissions during construction to less than significant levels.

COMMENT I-827.25 - ERRATA

Table 4.2-9 – PM10 and PM2.5 background concentrations are omitted from this table which is used as the basis for a 'Less than Significant' impact. However, Riverside Metropolitan stations 1 - Rubidoux list the annual average means and max 24-hr concentration for those pollutants. As the highest background concentration for both pollutants is above the SCAQMD localized significance threshold, the Threshold of 10.4 g/m3 is Exceeded and the project would have a Significant and Unavoidable Impact.

Year	$PM_{2.5}$ 24-hr	PM_{10} 24-hr
2021	82.1 $\mu g/m^3$	76 $\mu g/m^3$
2020	41.0 $\mu g/m^3$	104 $\mu g/m^3$
2019	46.7 $\mu g/m^3$	99 $\mu g/m^3$

RESPONSE I-827.25

The comment states that Table 4.2-9 should add PM_{10} and $PM_{2.5}$ background concentrations, which would cause the threshold of 10.4 micrograms per cubic meter to be exceeded. However, based on SCAQMD's Localized Significance Threshold Methodology, background concentrations

should only be considered for CO and NO_2[10]. As such, consistent with SCAQMD's methodology, the analysis did not consider background concentrations of PM_{10} and $PM_{2.5}$ when determining if the applicable localized significance threshold had been exceeded. In addition, please see the Project HRA, which explains that health risk impacts from construction of the Project would be well below the project level SCAQMD threshold of 10 in one million.

COMMENT I-827.26 - ERRATA

p.4.2-32 – The boundaries for the construction HRA are inconsistent with the No Trespassing boundaries and project site boundaries for Barton road in the South part of the project. Given the road construction in South Barton the modeling domain needs to include the construction and expansion of asphalt roads at Barton adjacent to the Grove Church. As mentioned in multiple other sections, the construction phase emissions appear to omit other adjacent construction projects and operational truck traffic from the March JPA.

RESPONSE I-827.26

Regarding construction of the southern Barton Street extension, please see Response I-827.6.c, above. The comment further references previous comments related to adjacent construction projects and operational truck traffic. Please see Response I-827.10, above.

COMMENT I-827.27 - ERRATA

Again PDF-AQ-2 is a description of construction phase emissions (CONSTRUCTION BUDGET), not operational cargo handling. The HRA should only apply those project design features listed in the draft EIR in its assumptions. The operational HRA assumption of Less than Significant Impact is not justified here, especially given that the March JPA has not adopted County of Riverside standards.

RESPONSE I-827.27

Please see the Project AQIA and Project HRA, which include discussion and analysis of diesel-powered cargo equipment and implementation of MM-AQ-18.

COMMENT I-827.28 - ERRATA

There is no mention of induced locomotive or commercial cargo traffic as a result of the cumulative impact of the additional warehouses for this project or in the region. Given that the RTP has no plans to improve the 215/60 interchange, the only way to add goods movement capacity is through additional cargo flights or train transport. Given the community flight path of March ARB commercial planes and the proximity of the rail line, noise and air quality from these alternate goods movement modes are also likely to increase. Please justify not including any induced commercial cargo flights or train trips in this project EIR.

[10] See Pages 2-5 and 2-8 of the *Final Localized Significance Methodology (2008)* which can be found: http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf

RESPONSE I-827.28

The comment states that the analysis does not mention any induced locomotive or commercial cargo traffic. The Project site is not served by any rail lines. Because the March ARB/Inland Port Airport is a joint use airport, civilian flights, including commercial cargo flights, are limited through a Joint Use Agreement between the March JPA and the U.S. Air Force.[11] Additional flights can only be approved after environmental review through CEQA and NEPA.[12] No additional flights are proposed as a part of this Project.

MICHAEL MCCARTHY LETTER I-828

COMMENT I-828.3

*The project completely omits the CO2 emissions associated with concrete foundations and building materials in its analysis. Each cubic yard of concrete (~1 ton of concrete) emits ~180 kg CO2 emissions, which is about 400 pounds of CO2. Assuming the average concrete slab for a warehouse is 6 inches thick, the calculation for one acre of concrete is 43560 feet/acre * 0.5 feet thick * 27 cubic feet/yard * 400 pounds of CO2/cubic yard of concrete = 161 tons of CO2/acre slab. Concrete slab foundations for 288 acres of warehouses and roads will likely emit 46,000+ tons of CO2 into the atmosphere. Note that this estimate will increase the project CO2 estimates in Table 4.7-7 of 93,000 tons by almost 50% and therefore the project has significantly underestimated its greenhouse gas emissions by omitting building materials for foundations, much less the buildings themselves. The cumulative impacts of warehouses on our region have been completely omitted from CEQA analyses to date and there are currently over 6,500 acres of warehouses built and another 4,300 acres approved/under construction/and in various planning phases. The cumulative impact of these warehouse slabs is 1.6 million tons of CO2 added to the atmosphere that hasn't been accounted for regionally.*

RESPONSE I-828.3

GHG emissions resulting from the pouring of concrete and building materials were not included in the analysis as it is not known the quantities and types of concrete and other materials that would be used, and it would be speculative to estimate any resulting GHG emissions.

The scope of GHG emissions is cumulative in nature, as further discussed in Response A-8.7. Additionally, as noted in Response A-8.7, the Project would also be required to comply with the County's Climate Action Plan. Lastly, it is not industry standard to perform a lifecycle analysis of potential greenhouse gas emissions from concrete and building materials as this type of emissions calculation is highly speculative in nature.

COMMENT I-828.4

Project VMT projections are based on flawed estimates of VMT per worker trip that assume workers are available locally (within 12 miles) to work at these warehouses. As described in the jobs/housing/population letter, the current unemployment rate in the Inland Empire is 3.7%1, literally the lowest value ever recorded in the 33 years of available data collected at a county level. There are

[11] https://www.marchjpa.com/documents/docs_forms/joint_use_agreement.pdf
[12] https://marchjpa.com/wp-content/uploads/2022/05/MIP-Carrier-req-for-Operational-status-instructions-2021.pdf

approximately 650,000 residents within 12 miles of this project, of whom approximately 50% are of working age (16-67) and in the labor force. Apply some basic math and the number of unemployed workers within 12 miles of this project is currently 11,000. Cumulatively, there are over 50,000 jobs expected from the approved World Logistics Center2 (35,000+ jobs), Stoneridge Commerce Center3 (10,000+ jobs) and other approved and planned warehouses in the region as shown in Figure 1. Therefore, we assert that the 2,600 workers estimated for this project don't exist locally and will have to commute from other areas where housing is cheaper to work here. There are plenty of existing warehouses that provide jobs, but very little local jobs that pay sufficient wages to work locally. Therefore, this project will NOT reduce VMT but will, in fact, increase it through increased VMT for local residents (who must commute long distances to find above-average paying jobs) and the workers for this project who must commute from Hemet or beyond to find affordable housing on typical warehouse wages ($18.75/hr). Given these clear indications that the area is job rich and housing poor, as fully documented in the jobs housing population comment letter, I ask that the VMT calculations account for actual employment numbers as of December 2022, the most recent prior to draft EIR release.

RESPONSE I-828.4

The DEIR analysis utilized data from the Project traffic study where possible, and otherwise relied on conservative estimates from CalEEMod and the local MPO/RTPA.

COMMENT I-828.5

The greenhouse gas VMT/employee CO2 emissions calculations do not account for autonomous trucks, delivery vehicles or future automation of warehouse jobs. A sensitivity study is needed to adequately calculate build-out year CO2/employee emission rates based on a high-automation future in 2045 where autonomous trucks and delivery vehicles emit pollution but yield no jobs. Currently, the jobs section provides no description of how the jobs numbers are estimates, nor what the types of jobs might be, so it is impossible to analyze how they might be affected by possible automation trends in the 2045 build out year.

RESPONSE I-828.5

At this time, it is speculative to assume future automation and/or incorporate such unknown factors into the Draft EIR.

COMMENT I-828.6

The greenhouse gas section Table 4.7-4 – Climate Action Plan Consistency claims 160 points of credit for EV charging 'stations'. Given that the project includes 20 individual parcels (4 industrial after Building A is split, 10 business-park, 6 mixed-use), claiming 20 credits for a single charging station per building does not pass the laugh test. Each of the other uses is applied to ALL buildings (e.g., insulation, cool roof, water efficient toilets) but the charging station credit does not apply on a per building basis (i.e., one credit for one station per building). The 20 stations will need to supply the majority of 35,000 daily trips when combustion vehicles are phased out in 2035 by CARB regulations. For example, if this project was simply one warehouse, rather than 20 building complex, it would be able to claim 160 points, but as 20 buildings in a complex it cannot claim credits disproportional to the number of buildings and vehicles served. Therefore, this credit should be 8 points (160/20 = 8), not the 160 points claimed. Therefore the project has only achieved a total score 74 points, rather than the 100 point

minimum necessary to achieve climate action plan consistency. Therefore, it is a Significant Impact with insufficient mitigation and consistency with climate action plan goals.

RESPONSE I-828.6

The Climate Action Plan Consistency table (6-3) in the Project GHG Analysis is consistent with explicit direction in the Riverside County CAP to assign 8 points per charging station. Measure T4.B.1 Electric Vehicle Recharging allows for the following points:

- Provide circuit and capacity in garages/parking areas for installation of electric vehicle charging stations. 2 points/area
- Install electric vehicle charging stations in garages/parking areas: 8 points/station.

Therefore, if the Project were to install 20 charging stations, it would receive 8 points/station for a total of 160 points.

However, as explained in the Project GHG Analysis, CALGreen includes mandatory requirements for the number of EV charging stations for nonresidential development. They are found in Table 5.106.5.3.1 which is reproduced here for convenience.

TABLE 5.106.5.3.1

TOTAL NUMBER OF ACTUAL PARKING SPACES	NUMBER OF REQUIRED EV CAPABLE SPACES	NUMBER OF EVCS (EV CAPABLE SPACES PROVIDED WITH EVSE)[2]
0–9	0	0
10–25	4	0
26–50	8	2
51–75	13	3
76–100	17	4
101–150	25	6
151–200	35	9
201 and over	20 percent of total[1]	25 percent of EV capable spaces[1]

1. Calculation for spaces shall be rounded up to the nearest whole number.
2. The number of required EVCS (EV capable spaces provided with EVSE) in column 3 count toward the total number of required EV capable spaces shown in column 2.

The Project includes site plans for Buildings B and C, and shows 545 parking spaces for Building B and 306 parking spaces for Building C. Based on the mandatory measures in CALGreen, which the Project is required to comply with, the Project (Specific Plan Area) is required to install well over 20 EV charging stations.

Building	Total Number of Actual Parking Spaces	Number of Required EV Capable Spaces	Number of EVCS (EV Capable Spaces Provided with EVSE)
B	545	109	28
C	306	62	16

MM GHG-7 was revised to require compliance with the CALGreen Nonresidential Voluntary Tier 2 measures for EV chargers. These are found in Table A5.106.5.3.2, which is reproduced below for convenience.

TABLE A5.106.5.3.2

TOTAL NUMBER OF ACTUAL PARKING SPACES	TIER 2 NUMBER OF REQUIRED EV CAPABLE SPACES	TIER 2 NUMBER OF EVCS (EV CAPABLE SPACES PROVIDED WITH EVSE)[2]
0–9	3	0
10–25	8	3
26–50	17	6
51–75	28	9
76–100	40	13
101–150	57	19
151–200	79	26
201 and over	45 percent of total parking spaces[1]	33 percent of EV capable spaces[1]

1. Calculation for spaces shall be rounded up to the nearest whole number.
2. The number of required EVCS (EV capable spaces provided with EVSE) in column 3 count toward the total number of required EV capable spaces shown in column 2.

Based on this revision, the Project will be required to install significantly more EV chargers. Assuming each lot in the Specific Plan will provide more that 50 parking spaces, at a minimum, each parking area would include 28 EV capable spaces, 9 of which would be provided with EV chargers. Under the CAP, this site plan would achieve 2 points for "installing circuit and capacity in parking areas for installation of electric vehicle charging stations", and 8 points for each of the 9 EV charging stations for a total of 74 points. For larger buildings, the parking areas would have more EV capable spaces and EV chargers. This is shown in the table below for Buildings B and C.

Building	Total Number of Actual Parking Spaces	Number of Required EV Capable Spaces	Number of EVCS (EV Capable Spaces Provided with EVSE)
B	545	246	82
C	306	138	46

March JPA recognizes that the footnote to Table 6-3 of the Project GHG Analysis may have led to the commenter's misunderstanding around the number of EV chargers that will be installed in the Specific Plan Area. As explained in the Project GHG Analysis, each building/site plan will be reviewed by March JPA, and "the March JPA shall verify incorporation of the identified Screening Table Measures within the Project building plans and site designs prior to the issuance of building permit(s) and/or site plans (as applicable). The March JPA shall verify implementation of the identified Screening Table Measures prior to the issuance of Certificate(s) of Occupancy." MM-GHG-12 requires each Project site plan implement Riverside County Climate Action Plan Screening Table Measures sufficient to provide for a minimum of 100 points per the County Screening Tables. Table 6-3. CAP Consistency shows an example of how a site plan could show compliance with the CAP.

COMMENT I-828.7

Finally, I note that the mitigation measures are completely inadequate. MM-GHG-1 should be increased to at least 70% of building power requirements from solar. MM-GHG-7 should require one EV charging

station per 200 vehicle trips – 175 charging stations. Additionally, it should include at least 20 heavy-duty truck chargers (one per every 100 truck trips).

Additional GHG mitigation measures that should be included are:

- *Require the March JPA to ensure that all construction and operational requirements meet or exceed the County of Riverside GHG requirements, since the March JPA will be handing over enforcement and compliance responsibilities to the County prior to project opening and will be responsible for overseeing and enforcing construction phase activities for a minimum of 60% of the construction period (2025-2028).*
- *Require 25% of all off-road construction vehicles in each class or as a fraction of total CO2 emissions to be battery-electric.*
- *Require low CO2 concrete for the foundations and roads (less than 250 pounds of CO2 per cubic yard)*
- *Require low albedo roads and roofs to reduce reflectivity and urban heat island effect*
- *Require roofs that do not include solar panels to be covered in vegetation to reduce urban heat island, sequester CO2, and mitigate the air quality impacts of truck pollution*
- *Require 50% of tenant owned passenger vehicles by tenants that visit the West Campus to be battery-electric in the 2028 opening year and 100% to be battery-electric by 2030.*
- *Require 25% of tenant owned trucks that visit the West Campus to be battery-electric in the 2028 opening year and 100% to be battery-electric by 2035.*
- *Require 25% of trucks visiting the West Campus owned by subcontractors owning over 10 trucks to be battery-electric in the 2028 opening year and 100% to be battery-electric by 2035.*

RESPONSE I-828.7

The Project GHG Analysis determined the Project would have less than significant GHG impacts. Regarding solar, MM-GHG-1 requires rooftop solar photovoltaic (PV) electricity generation sufficient to generate at least 100% of the building's power requirements, or the maximum permitted by the Riverside County Airport Land Use Commission. MM-GHG-7 requires each Project site plan shall provide circuitry, capacity, and equipment for EV charging stations in accordance with Tier 2 of the 2022 CALGreen Code. PDF-GHG-1 requires conduit be installed in truck courts in logical locations that would allow for the future installation of charging stations for electric trucks, in anticipation of this technology becoming available. MM-AQ-11 requires demonstration that main electrical supply lines and panels have been sized to support 'clean fleet' charging facilities, including heavy-duty and delivery trucks when these trucks become available. Further, the Project will comply with the requirements of Section 5.106.5.4.1 (Electric vehicle readiness requirements) of the CALGreen Code.

MM-GHG-12 requires each Project site plan implement Riverside County Climate Action Plan Screening Table Measures sufficient to provide for a minimum of 100 points per the County Screening Tables. MM-GHG-4 requires construction of modest cool roof, defined as Cool Roof Rating Council (CRRC) Rated 0.15 aged solar reflectance and 0.75 thermal emittance. MM-AQ-10 requires cool surface treatments to be added to all drive aisles and parking areas or such areas shall be constructed with a solar-reflective cool pavement such as concrete.

Regarding construction, MM-AQ-1 requires that off-road equipment used during construction shall meet CARB Tier 4 Final emission standards or better. The Project AQIA determined the Project would have less than significant construction air quality impacts with implementation of MM-AQ-1 through MM-AQ-4.

Regarding fleet electrification, MM-AQ-20 requires all heavy-duty trucks (Class 7 and 8) domiciled at the project site are model year 2014 or later from start of operations, and shall expedite a transition to zero-emission vehicles, with the fleet fully zero-emission by December 31, 2030 or when feasible for the intended application, whichever date is later. MM-AQ-20 further requires tenants utilize a "clean fleet" of vehicles/delivery vans/trucks (Class 2 through 6) as part of business operations as follows: For any vehicle (Class 2 through 6) domiciled at the project site, the following "clean fleet" requirements apply: (i) 33% of the fleet will be zero emission vehicles at start of operations, (ii) 65% of the fleet will be zero emission vehicles by December 31, 2026, (iii) 80% of the fleet will be zero emission vehicles by December 31, 2028, and (iv) 100% of the fleet will be zero emission vehicles by December 31, 2030 or when feasible for the intended application, whichever date is later. In response to comments, MM-AQ-20 has been revised to clarify applicable definitions and the factors March JPA will consider in determining the measure's feasibility as the Project site is developed. This measure would not apply to vehicles that are not owned and operated by the facility operator or facility tenants since it would be infeasible to prohibit access to the site by any vehicle that is otherwise legal to operate on California roads and highways.

COMMENT I-828.8

Lastly, the climate change section notes that China is the largest emitter of carbon dioxide emissions in Table 4.7-2, nearly doubling the US emissions annually. However, the United States has outsourced the manufacturing of our goods to China, and thus outsourced our CO2 emissions to that country as well. It is ironic that this warehouse complex project is entirely based around imports from China and other nations in a global supply chain that irresponsibly emits greenhouse gases in every steps of the goods movement industry. Goods are manufactured in China, shipped by rail/train/boat to the ports, where they are shipped by dirty ocean-going vessels across the Pacific. In the Ports of Los Angeles and Long Beach, the drayage trucks then take a 71 or 67 mile trek to the March JPA, emitting 2.44 pounds of CO2 and a few milligrams of diesel PM for each mile they go.

RESPONSE I-828.8

Global impacts from the international supply chain is speculative and outside the expertise and jurisdiction of March JPA.

As explained in the Project GHG Analysis, climate change is a global phenomenon, and the effects of GHG emissions are considered cumulative. As also explained in the Draft EIR, "Governor Arnold Schwarzenegger signed EO S-01-07 on January 18, 2007. The order mandated that a statewide goal be established to reduce the carbon intensity of California's transportation fuels by at least 10% by 2020. In particular, the executive order established a [Low Carbon Fuel Standard] LCFS and directed the Secretary for Environmental Protection to coordinate the actions of the CEC, CARB, the University of California, and other agencies to develop and propose protocols for measuring the "life-cycle carbon intensity" of transportation fuels." "In 2018, CARB approved amendments to the regulation, which included strengthening the carbon intensity

benchmarks through 2030 in compliance with the SB 32 GHG emissions reduction target for 2030. The amendments included crediting opportunities to promote zero-emission-vehicle adoption, alternative jet fuel, carbon capture and sequestration, and advanced technologies to achieve deep decarbonization in the transportation sector." The State (through CARB) therefore takes into account life-cycle carbon intensity" of transportation fuels.

CARB's 2022 Scoping Plan explains that "Low carbon fuel mandates similar to California's LCFS have been adopted by the U.S. EPA and by other jurisdictions, including Oregon, Washington, British Columbia, the European Union, and the United Kingdom. Many other jurisdictions from Japan to New Zealand, Australia, and the European Commission also continue to seek information and technical experience on our LCFS. California has and will continue to share information and encourage ambitious emissions reductions with interested jurisdictions, with a focus on China, India, Mexico, Canada, and the European Union. California's early action to reduce super-pollutants such as methane and other SLCPs was reaffirmed by the 2021 Global Methane Pledge signed by the U.S. and over 100 other countries at the 26th Conference of the Parties to the United Nations Framework Convention on Climate Change (UNFCCC)." [2022 Scoping Plan, p. 39]. It further explains that "at the national level, China has looked to California for cutting-edge requirements for car diagnostics and policies that promote zero-emissions vehicles. At a local level, Beijing has adopted California's vehicle emissions standards and several other progressive environmental regulations. California will continue and renew such efforts across China, including through a 2022 MOU signed with China's Ministry of Ecology and Environment." [2022 Scoping Plan, p. 40.]

MICHAEL MCCARTHY LETTER I-832

COMMENT I-832.7

In the draft EIR, we find most figures use the IS/NOP version of the Site Plan. Table 1 shows the entire list of figures that show a Project Site Plan and whether they used the IS/NOP Figure 4 or Draft EIR Figure 3.5 version.

RESPONSE I-832.7

As noted in Table 1 of Comment I-832.7, the exhibits in the technical studies prepared by Urban Crossroads, Inc. (Air Quality, Greenhouse Gas, Health Risk Assessment, Energy, Traffic, Vehicle Miles Traveled, and Noise Studies) have been updated to reflect the correct land use plan.

COMMENT I-832.8

Modeled on-site emissions for air quality and health risk assessment sections in Appendix C1 and C2 Exhibit 2-B are incorrect and do not reflect the location of the proposed cold storage warehouse which is critical to model correctly due to the longer idling times and higher emissions for the TRU units at docking doors. The 'Industrial' Building A cannot be modeled as a single indistinguishable building when two separate mega-warehouses are proposed in that parcel that have very different emissions characteristics.

RESPONSE I-832.8

See Response I-827.9.

COMMENT I-832.9

However, we note that all construction boundaries exclude the water tank adjacent to residential homes in Orangecrest and associated trenches required to install underground reclaimed water pipes. In contrast, we believe that the construction boundaries for the Air Quality, Health Risk Assessment and Noise analyses are all too small, include no buffers that will be required for grading and building the roads and are a drastic underestimate. These construction boundaries are inappropriate. Given that the proximity of residential zones and sensitive receptors is highly sensitive to the distance from the nearest residence to the construction zone, it is imperative that the modeled construction zones accurately reflect the project construction boundaries – especially near the Grove preschool where children under the age of 4 are particularly sensitive to these impacts.

RESPONSE I-832.9

As shown in revised Exhibit 2-A of the Project HRA, the analysis placed construction sources within 80 feet of the Grove Preschool (represented by Receptor R8), and the modeling conservatively assumed that construction would occur at these locations for the entire 4.35-year duration of Project construction, although construction on the southern Barton extension adjacent to the preschool would take place over a significantly shorter period of time. As shown on the revised Exhibit 2-A of the Project HRA, the closest sensitive receptor (Receptor 11) is 32 feet from construction activities, specifically the northern Barton Street extension and the Mixed Use parcels of the Specific Plan Area. Even with analyzed exposure of 4.35 years of construction emissions, the mitigated construction health risk at Receptor R11 is 0.56 in one million, well below the SCAQMD significance threshold of 10 in one million. As noted in the Final EIR and Project HRA, TACs generally dissipate with distance from the source. The homes along Grove Community Drive and Barton Drive in the vicinity of the offsite water tank construction and waterline installation would not be exposed to construction source emissions to the extent or duration compared to Receptor R11 – _the mitigated construction health risk would be below 0.56 in one million. Offsite construction would occur over a significantly shorter duration than construction of the Project itself. As such, since the mitigated construction health risk at Receptor R11, the maximally exposed individual receptor (MEIR), is well below the SCAQMD significance threshold, the Project will not cause a significant human health or cancer risk to nearby residences from any on-site or off-site construction activity. Additionally, the Project includes open space areas on which construction activities would not occur. As such, sources were not placed on these areas as no construction activities are expected to occur there.

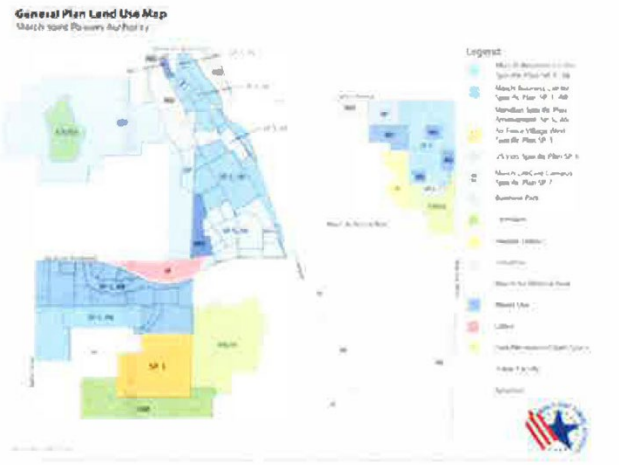
MICHAEL MCCARTHY LETTER I-834

COMMENT I-834.4

I find the geographic scope of analysis listed in Table 4-1 to be inconsistent with the definitions of geographic vicinity listed in the draft EIR.

On page 4-3, it states, 'Unless otherwise indicated in the analysis in Chapter 4 of this Draft EIR, the geographic scope used in the cumulative analysis includes the March JPA planning area.' It is obviously clear that at the March JPA planning area is not completely included in the Table 4-2 cumulative impacts project list.

Our best estimate is that the March JPA has an existing warehouse footprint (i.e., parcel size)[1] of approximately 23 million square feet, with an estimate square footage of approximately 12 million square feet. Multiple warehouse and industrial facilities within the March JPA Meridian Specific Plan SP-5, AS, Specific Plan SP-1, A6, and aviation facilities associated with commercial cargo operations and the proposed Meridian D-1 Aviation Gateway are left off the March JPA planning area cumulative impacts list. These are clearly visible in the March JPA General Plan Land Use Map.



March JPA General Plan Land Use Map - February 2023.

However, it is also clear that the 'immediate vicinity' of the Meridian West Campus Upper Plateau has far more warehouses than the March JPA planning area includes. Therefore, we request that all 'Immediate Vicinity' analyses include all warehouses and designated truck routes located within 1-mile of project specific plan area as shown in Figure 1. Thus, we request that all warehouses and truck routes within this 1-mile boundary be explicitly included in all construction phase and operational phase analyses that fit the 'Immediate Vicinity' geographic scope.

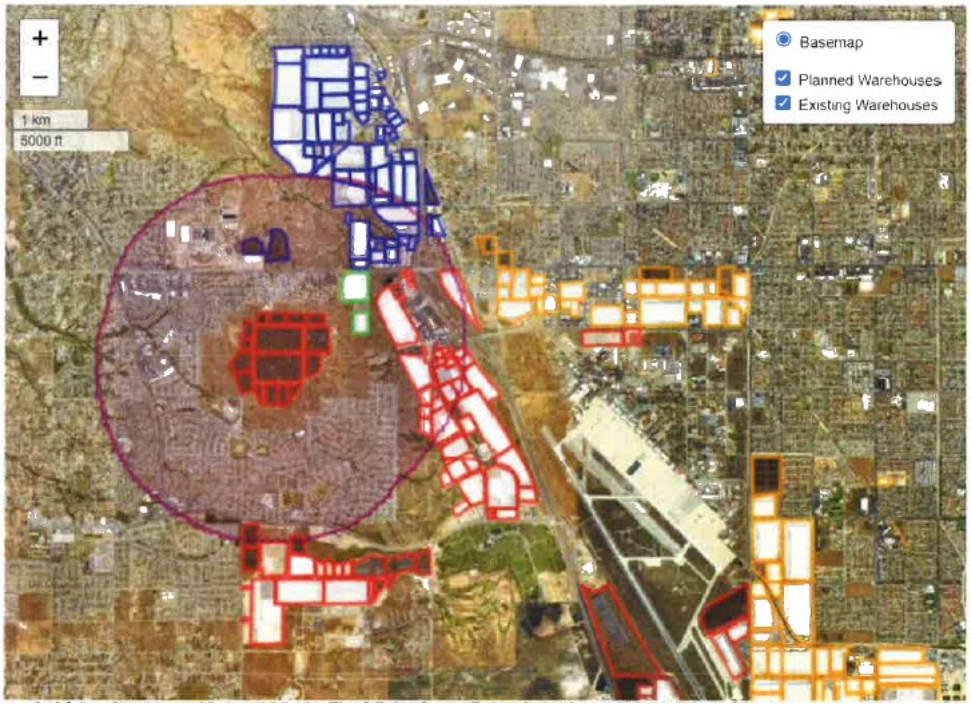


Figure 1- *Map of project area, surrounded by a 1-mile buffer. Warehouse colors indicate the jurisdiction responsible for land-use authority, while the fill indicates an existing (white) or planned/approved (gray) warehouse project.*

RESPONSE I-834.4

Please see the Project AQIA for an expanded discussion and analysis of cumulative conditions and impacts. Please see the Project HRA for expanded discussion and analysis of cumulative health risk impacts, including along the Project's truck routes, and cumulative cancer risk utilizing the U.S. EPA's threshold of 100 in one million. Table 4.1 has been revised in the Final EIR.

COMMENT I-834.5

Table 1 – Immediate Vicinity Analyses that should include all 1-mile warehouses and adjacent Truck Routes (March JPA, County, City of Riverside).

Environmental Resource	Geographic area	List of Projects and Truck Routes
Aesthetics	1-mile	Table 2 List
Air Quality (Toxic Air Contaminants, odors)	1-mile	Table 2 List
Noise (Construction Phase)	1-mile	Table 2 List
Noise (Operational)	1-mile	Table 2 List

Specifically, the Table 1 project areas should be analyzed to include the truck routes, freeway, and warehouses within 1-mile of the project site for cumulative impacts on aesthetics, air quality, and noise. Thus, I ask that these analyses explicitly model the air quality from the loading bays of the 44 warehouses in this list, the five truck route arterial roads, and the 215 Freeway – in addition

to- the modeling of the 21 warehouses planned for this project. That is the 'Immediate Vicinity' cumulative impact of warehouses on our local air quality.

RESPONSE I-834.5

Please see the Project AQIA for an expanded discussion and analysis of cumulative conditions and impacts. Please see the Project HRA for expanded discussion and analysis of cumulative health risk impacts, including along the Project's truck routes, and cumulative cancer risk utilizing the U.S. EPA's threshold of 100 in one million. Table 4.1 has been revised in the Final EIR.

COMMENT I-834.8

In addition to immediate vicinity geographic impacts, multiple environmental resources drastically underestimated the regional impact of past, present, and probable future projects on the 215/60 Corridor area. For completeness, Table 3 shows the list of environmental resources that should be analyzed regionally.

***Table 3** - Regional Analyses that should include all 10-mile warehouses and truck routes*

Environmental Resource	Geographic area	List of Projects and Truck Routes
Air Quality (construction/mobile sources)	Regional	Table 4 List
Land Use and Planning	Regional	Table 4 List
Population and Housing	Regional	Table 4 List
Transportation	Regional	Table 4 List

Figure 2 helpfully identifies a 10mile buffer region around the project boundary, although I only include Riverside County warehouses to focus on the 215/60 corridor impacts as the primary transportation and land-use bottle-neck is within the Riverside county portion.

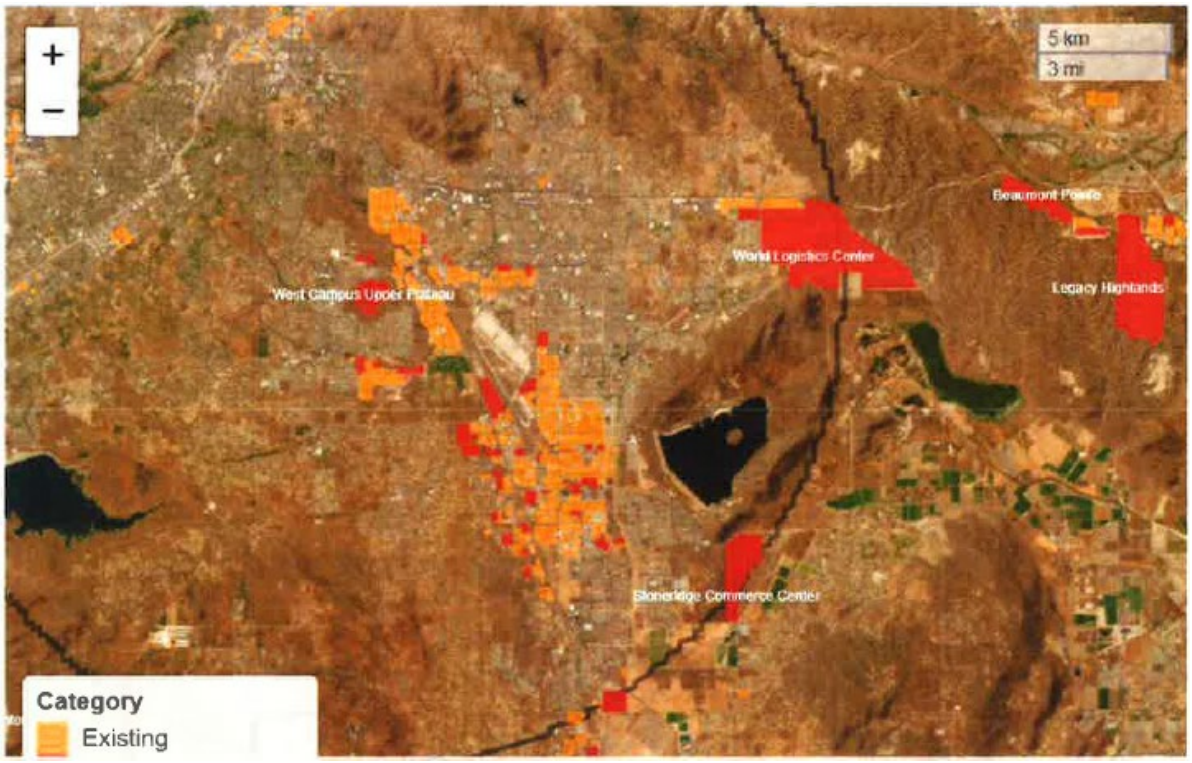


Figure 2 - *10-mile regional buffer region with warehouses (existing and planned/approved) overlaid. Existing warehouses have a white fill, while approved/planned warehouse areas are filled in gray.*

The existing regional warehouse footprint of warehouses is approximately 280 million square feet. The planned and approved warehouse footprint includes another 200 million plus square feet of land, nearly doubling the existing footprint.

Of most importance, two critical projects are going to have an extremely large impact on the region - the World Logistics Center (east Moreno Valley) and the Stoneridge Commerce Center (Nuevo, unincorporated Riverside County).

The World Logistics Center is breaking ground in 2023. It will be developed in two phases over approximately 12 years and will include 40 million square feet of warehouses and over 19,000 daily truck trips when fully built out. Its environmental impact report suggested it would generate 35,000 jobs[2].

The Stoneridge Commerce Center has been approved by Riverside County. It is over 9.5 million square feet of warehouses and was projected to generate over 10,000 jobs[3] and nearly 4,000 truck trips.

These two very large projects are projected to generate 45,000+ jobs and 23,000 daily truck trips, most of which will travel on the 215/60 corridor. While these are two of the largest projects in the region - together they account for 109 million square feet of the total footprint - they are just slightly more than 52% of the planned and approved warehouses in the 215/60 corridor within 10 miles. Another 100 million square feet of footprint is also approved. I list the projects below, along their approximate footprint for review: Our region will be adding an enormous number of

warehouses to a region that is already overwhelmed by truck traffic and pollution and does not have the existing local workforce or housing to support this continued growth in industrial projects.

Table 4 provides a list of warehouses built since 2018 and planned/approved in the area along the 215/60 corridor. This is a reasonable list for a present and planned list of warehouses in the region to address for the regional environmental issues.

***Table 4**. List of warehouses and warehouse complexes in the region to include in Environmental Analyses.*

[TABLE OMITTED]

In total, the existing and approved acreage of warehouses built and approved in the last 5 years has been enormous in the region. As a result, regional analyses of warehouses, traffic, jobs, population, and air quality that are not current will drastically underestimate the regional impacts of warehouses on the 215/60 corridor. This table should be adopted and included in a comprehensive cumulative impacts analysis for the regional air quality, jobs, population, and transportation sections.

I leave you with one last map showing the 15-mile regional buffer of warehouses within our region. It includes some of the other mega-projects just at or beyond the regional boundary defined in the Transportation analysis section. Figure 3 shows the whole Inland Empire, a 15-mile buffer boundary around the project, and a few labeled mega-warehouse complexes that have been approved or are in planning stages ranging from NOP to draft EIR. Key complexes not mentioned yet include the Serrano Commerce Center, West Valley Logistics Center, Speedway Commerce Center, Airport Gateway, Bloomington Business Park, South Ontario Logistics Center, Merrill Commerce Center, and the Renaissance Ranch Commerce Center, and the South Perris Industrial Center.

I made these maps to provide a vision of what the future of our region looks like. The future is an unlivable wasteland of warehouse complexes - squeezing out the residents of the region to make room for the titans of eCommerce to make a few more $$$. It would be awesome if our decision makers took a long hard look at our region and thought about how the quality of life looks in 10-20 years when all these warehouses will be fully built out. I don't think this looks like a place people will choose to come to unless they have no better options. I think better planning is possible, but it requires decision-makers to put quality of life issues over easy short-term profits and tax revenue.

To put this in proper perspective, it needs to be explicitly addressed in the EIR and these project lists are 100% consistent with the geographic scope listed in Section 4.0. Please add these projects and do a truly comprehensive analysis of the regional impacts of warehouse growth.

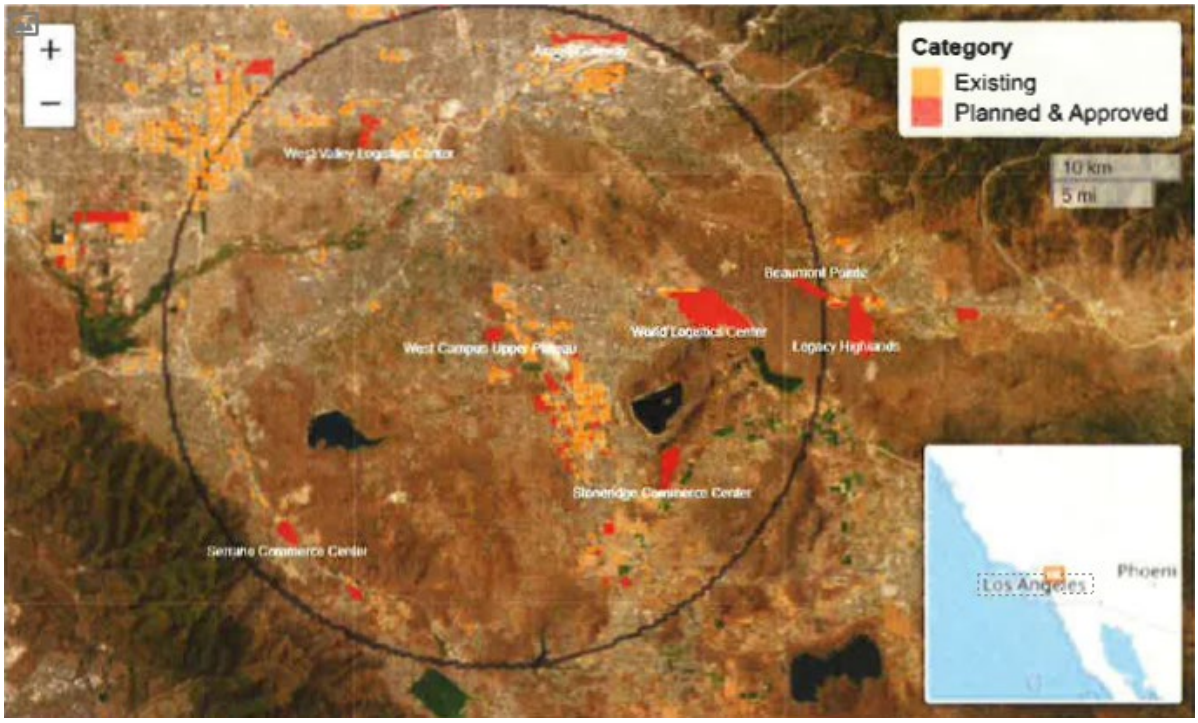


Figure 3 - *Existing and planned/approved warehouse development in a 15-mile ring (black circle) around the West Campus Project.*

RESPONSE I-834.8

Please see the Project AQIA for an expanded discussion and analysis of cumulative conditions and impacts. Please see the Project HRA for expanded discussion and analysis of cumulative health risk impacts, including along the Project's truck routes, and cumulative cancer risk utilizing the U.S. EPA's threshold of 100 in one million. Table 4.1 has been revised in the Final EIR. The method for cumulative evaluation for Greenhouse Gases is consistency with applicable statewide and local regulatory programs designed to reduce GHG emissions consistent with AB 32/SB 32 and consistency with SB 375. Under the Riverside County CAP, projects that garner at least 100 points (equivalent to an approximate 49% reduction in GHG emissions) are determined to be consistent with the reduction quantities anticipated in the County's GHG Technical Report, and consequently would be consistent with the CAP. As such, projects that achieve a total of 100 points or more are considered to have a less than significant individual and cumulative impact on GHG emissions. MM-GHG-12 requires each Project site plan implement Riverside County Climate Action Plan Screening Table Measures sufficient to provide for a minimum of 100 points per the County Screening Tables. The Project would not have cumulatively considerable GHG impacts.

MICHAEL MCCARTHY LETTER I-836

COMMENT I-836.7

The health risk assessment in Appendix C2 did not include the proposed park as a sensitive receptor location in its analysis. The Park will be used for active recreation less than 100 feet from warehouses.

The park is extremely likely to be used for preschool children and active recreation that will enhance breathing rates leading to higher exposures for these children. Riverside GNG clearly state that a health risk assessment should be performed and diesel exposures to sensitive receptors (schools, parks, playgrounds, etc.) should be minimized. This park is likely to receive higher doses of diesel PM and NOx due to its closer proximity to the proposed warehouses yet is not included in the health risk assessment at all as a sensitive receptor location (see appendix C2 Exhibit 2-D).

RESPONSE I-836.7

See Response A-9.12.

M. CLARK LETTER I-926

COMMENT I-926.2

The draft EIR in section 4.2 refers to the dangers of particulate matter (PM) in the air. It cites that PM increases in the number and severity of asthma attacks, causes or aggregates bronchitis and other lung diseases and reduces the body's ability to fight infections. It also acknowledges that children exposed to PMs may experience a decline in lung function. Further, the draft EIR discloses that more than 90% of Diesel Particulate Matter (DPM), which comes from the operation of diesel trucks, is a subset of PM2.5, one of the most dangerous categories of PM.

While the draft EIR acknowledges some of the ill effects of PM, particularly regarding respiratory issues, I did not see any data or acknowledgment of what we know are serious neurological effects due to air pollution including specifically PM. Epidemiological studies consistently associate exposure to urban air pollution with increased risk of dementia. Air pollution has also been implicated in an increase in autism in children. I have listed just a few scientific articles below as an example of the research linking air pollution with neurological diseases, but there is a whole body of research on this topic. As you will see, particulate matter is especially implicated in neurological harm in children and adults.

Why has the EIR not informed the public of the serious consequences on cognitive health that will result from this Project? Perhaps it is because it would scare the public - asthma is one thing but autism and Alzheimer's Disease are a different kind of devastating outcome that the public should be made aware of. Given this information, the fact that the Project would be 794 feet from the Grove pre-school is quite literally immoral.

Even this overly optimistic draft EIR acknowledges that the Project will have significant and unavoidable impacts on air quality. Specifically, the AQ1 threshold of significance, both consistency criteria 1 and criteria 2, will not be met even with all of the available mitigation measures. What it does not disclose is the full impact of the reduced air quality on those who live in the region.

Research regarding the effects on cognitive health caused by the significant and unavoidable impacts on air quality by the proposed Project must be performed and reported to the public before this Project can proceed.

RESPONSE I-926.2

The Project HRA performed a health risk analysis for the Project to evaluate the risks associated with diesel particulate matter at sensitive receptor locations (including Grove Preschool) using the latest health data for diesel particulate matter available from OEHHA. The analysis indicated

that the Project would not result in significant health impacts for any sensitive receptors in the vicinity. Additionally, the Project AQIA performed modeling consistent with SCAQMD LST guidance to evaluate if emissions resulting from the construction or operation of the proposed Project would exceed localized significance thresholds for emissions of CO, NO_x, PM_{10}, and $PM_{2.5}$. The results of the analysis indicate that neither construction nor operational emissions would exceed the localized significance thresholds established by SCAQMD for any nearby sensitive receptors.

MEMORANDUM

URBAN | CROSSROADS

DATE: May 16, 2024
TO: Nicole N. Cobleigh, Dudek
FROM: Urban Crossroads
JOB NO: 14064-20 RTC RDEIR

WEST CAMPUS UPPER PLATEAU RESPONSE TO COMMENTS

Urban Crossroads, Inc. is pleased to submit the following Response to Comments on the Recirculated Draft Environmental Impact Report for the West Campus Upper Plateau (Project), which is generally located south of Alessandro Boulevard and west of Brown Avenue within the jurisdiction of the March Joint Powers Authority (March JPA) in Riverside County. In response to recirculation comments, minor revisions have been made to the Project Air Quality Impact Analysis (AQIA) and Health Risk Assessment (HRA). For purposes of these responses to comments, citations to the EIR, Project AQIA, and Project HRA refer to the Final EIR, and Project AQIA (Appendix C-1) and Project HRA (Appendix C-2) of the Final EIR.

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT LETTER RA-6

COMMENT RA-6.3

Section 4.2 – Air Quality of the Recirculated Draft EIR has a footnote that states, "Light Duty passenger cars are not considered a significant source of mobile source TAC emissions, and there is no evidence that exposure to gasoline causes cancer in humans.4" South Coast AQMD staff has concerns regarding this statement.

According to the United States Environmental Protection Agency (U.S. EPA), mobile sources (motor vehicles and nonroad equipment) contribute significantly to benzene, acrolein, 1,3-butadiene, and acetaldehyde nationwide emissions.5 The U.S. EPA - Control of Emissions of Hazardous Air Pollutants from Motor Vehicles and Motor Vehicle Fuels6 also states that 1) benzene is a component of gasoline; 2) cars emit small quantities of benzene in unburned fuel or as vapor when gasoline evaporates; 3) a significant amount of automotive benzene is generated from the incomplete combustion of gasoline compounds (e.g., toluene and xylene); 4) other compounds, such as acetaldehyde and formaldehyde, can be formed through a secondary process when mobile source pollutants undergo a chemical reaction in the atmosphere. In addition, the Public Health Statement for Benzene from the Agency for Toxic Substances and Disease Registry mentions that the International Agency for Cancer Research and the U.S. EPA have determined that benzene is carcinogenic to humans.7 Furthermore, the U.S. EPA also identified nine air-toxic compounds with mobile sources as the considerable contributors, which are 1,3-butadiene, acetaldehyde, acrolein, benzene, diesel particulate matter (diesel PM), ethylbenzene, formaldehyde, naphthalene, and polycyclic organic matter.8 Although the Proposed project is not a National Environmental Policy Act (NEPA) project, it is

recommended that the Lead Agency review the information regarding these air toxics as priority mobile sources in the Updated Guidance on Mobile Source Air Toxic Analysis in NEPA,9 published by the Federal Highway Administration (FHWA). ***The Proposed Project would generate over 34,000 passenger cars daily. With benzene being carcinogenic to humans, it is essential to include it in the health risk assessment (HRA) in addition to the daily truck trips and estimate the cancer risk to the sensitive receptors surrounding the Proposed Project.***

RESPONSE RA-6.3

The comment questions the statement in the EIR that "there is no evidence of that exposure to gasoline causes cancer in humans." The EIR and Project AQIA cite the Agency for Toxic Substances and Disease Registry's September 1996 ToxFAQs regarding automotive gasoline. However, this authority is focused on gasoline fumes, not gasoline emissions. This statement has been removed and additional information regarding toxic air contaminants from gasoline-powered vehicles can be found at: https://www.epa.gov/gasoline-standards/learn-about-gasoline. The EPA implements a number of programs that reduces toxic contaminates in gasoline.

Diesel particulate matter (DPM) has been identified as the top contributor to cancer risk-weighted emissions, contributing more than 85% of the total carcinogenic potential of emissions. Carcinogenic compound contributions from gasoline-powered cars and light duty trucks include 1,3-butadiene (4%) and benzene (3%). Collectively, five compounds—DPM, 1,3-butadiene, benzene, formaldehyde, and acetaldehyde— were found to be responsible for more than 90% of the cancer risk attributed to emissions.[1] While passenger vehicles do emit some TACs, the inclusion of passenger vehicle emissions in the analysis would not alter the findings. For example based on the Bay Area Air Quality Management District (BAAQMD) data cited above, even if the Project operational risk estimates were increased by 15%, this would result in a risk of 5.23 in one million for the unmitigated scenario and 2.56 in one million for the mitigated scenario, both of which are well below the applicable threshold of 10 in one million. In addition, the BAAQMD data is from 2014 when there were a limited number of electric vehicles available compared to current and future EV usage.[2] The increasing trend toward electric passenger vehicles will reduce the volume of gasoline related emissions and will further reduce any health risks associated with gasoline powered passenger vehicles. It should be noted that based on EMFAC data, the ratio of diesel trucks to passenger cars for the proposed Project closely matches that of Riverside County,

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[1] Bay Area Air Quality Management District, 2014, *Improving Air Quality & Health in Bay Area Communities, Community Air Risk Evaluation Program Retrospective & Path Forward (2004 to 2013)*. https://www.baaqmd.gov/~/media/Files/Planning%20and%20Research/CARE%20Program/Documents/CARE_Retrospective_April2014.ashx?la=en

[2] See https://www.energy.ca.gov/data-reports/energy-almanac/zero-emission-vehicle-and-infrastructure-statistics/light-duty-vehicle. In Riverside County alone, there was an increase from 0.23% EVs on the road in 2014 to 2.64% in 2022. This trend will continue to increase given California's Advanced Clean Cars II regulations that mandated all new passenger cars, trucks, and SUVs sold in California will be zero-emission vehicles by 2035. https://ww2.arb.ca.gov/resources/documents/cars-and-light-trucks-are-going-zero-frequently-asked-questions#:~:text=As%20part%20of%20the%20Advanced,Advanced%20Clean%20Cars%20II%20regulations.

with approximately 6% of the fleet mix being heavy duty trucks. Therefore, compared to gasoline-powered passenger vehicles, diesel truck emissions pose a significantly greater health risk.

The estimation that passenger vehicles contribute approximately 15% of the total risk is further substantiated by data presented in SCAQMD's MATES V Study. Based on Figure ES-2 in the MATES V Final Report,[3] 1,3-butadiene and benzene contribute approximately 15% to the total risk. As stated on page 2-20 of the MATES V Final Report, these pollutants are largely associated with gasoline combustion.

Additionally, passenger vehicles and trucks differ in their speeds and behavior while visiting the Project site and on surrounding roadways. Passenger vehicles typically travel at higher speeds, and would presumably arrive at the site, park, and be turned off. Alternatively, trucks travel more slowly, spending a greater amount of time on the Project site and off-site roadways. Truck engines would also be operating for longer periods of time on the Project site while checking in at the facility, maneuvering, and parking at Project loading docks. Although CARB anti-idling requirements restrict idling to no more than 5 minutes, the analysis conservatively assumed that, unmitigated, trucks would idle for 15 minutes at building loading docks.

Diesel truck exhaust poses a greater health risk than gasoline passenger vehicles, because trucks "behave" differently at the Project site in a manner that would produce more emissions. Diesel truck exhaust is the primary driver of health risk for facilities such as the proposed Project.

The Project HRA was prepared in accordance with SCAQMD's Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis[4] and was comprised of all relevant and appropriate procedures presented by the U.S. EPA, California EPA and SCAQMD. Consistent with SCAQMD guidance and standard CEQA analyses, the Project HRA analyzed emissions from both on-site and off-site truck trips, truck idling emissions, and emissions that would occur from TRU operation both on- and off-site, as well as emissions that would result from the use of operational on-site cargo handling equipment. The analysis concluded that any impacts would be less than significant. This analysis satisfies the requirements of CEQA.

Furthermore, the International Agency for Research on Cancer (IARC), which is part of the World Health Organization (WHO), has classified diesel engine exhaust as "carcinogenic to humans" (Group 1) based on sufficient evidence of its carcinogenicity to humans. This classification is in contrast to gasoline engine exhaust, which is classified as "probably carcinogenic to humans" (Group 2A) due to limited evidence in humans and strong evidence in experimental animals.[5]

COMMENT RA-6.4

CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse air quality impacts. South Coast AQMD staff recommends incorporating additional mitigation measures into the Final EIR.

[3] https://www.aqmd.gov/docs/default-source/planning/mates-v/mates-v-final-report-9-24-21.pdf

[4] https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis

[5] https://www.iarc.who.int/wp-content/uploads/2018/07/pr213_E.pdf

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 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.*

4) *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 do not face 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.*

RESPONSE RA-6.4

The Project already includes the mitigation measures addressing all issues raised by the commenting agency that would reduce emissions. Regarding fleet electrification, MM-AQ-20 requires all heavy-duty trucks (Class 7 and 8) domiciled at the project site are model year 2014 or later from start of operations, and shall expedite a transition to zero-emission vehicles, with the fleet fully zero-emission by December 31, 2030 or when feasible for the intended application, whichever date is later. The commenting agency recommends requiring the use of a 2010 model year at a minimum. MM-AQ-20 requires a minimum of a 2014 model year, which is a stricter standard. MM-AQ-20 further requires tenants utilize a "clean fleet" of vehicles/delivery vans/trucks (Class 2 through 6) as part of business operations as follows: For any vehicle (Class 2 through 6) domiciled at the project site, the following "clean fleet" requirements apply: (i) 33% of the fleet will be zero emission vehicles at start of operations, (ii) 65% of the fleet will be zero emission vehicles by December 31, 2026, (iii) 80% of the fleet will be zero emission vehicles by December 31, 2028, and (iv) 100% of the fleet will be zero emission vehicles by December 31, 2030 or when feasible for the intended application, whichever date is later. In response to comments, MM-AQ-20 has been revised to clarify applicable definitions and the factors March JPA will consider in determining the measure's feasibility as the Project site is developed. This measure would not apply to vehicles that are not owned and operated by the facility operator or facility tenants since it would be infeasible to prohibit access to the site by any vehicle that is otherwise legal to operate on California roads and highways. MM-AQ-5 requires every site plan to provide documentation confirming the plan's environmental impacts, including truck trips, do not exceed the impacts identified and disclosed in the EIR; absent such documentation, additional environmental review will be required.

Additionally, MM-AQ-8 requires the Project to provide electrical hookups at all TRU loading docks in order to support electric TRUs, while MM-AQ-11 supports the electrification of truck fleets by requiring the Project to size main electrical supply lines and panels to support electric vehicle charging, including the charging of HHD and delivery trucks once these trucks become available. MM-GHG-7 requires each Project site plan shall provide circuitry, capacity, and equipment for EV charging stations in accordance with the voluntary Tier 2 of the 2022 CALGreen Code.

Regarding air quality impacts from other area sources, pursuant to MM-GHG-1, the Project will install rooftop solar photovoltaic (PV) electricity generation sufficient to generate at least 100% of the building's power requirements, or the maximum permitted by the Riverside County Airport Land Use Commission. MM-GHG-2 through MM-GHG 6 require Energy Star certified light bulbs and light features; specified duct insulation and window insulation; solar-reflecting cool roof material; improved HVAC with a SEER rating of 14 or higher as required by Energy Star; high efficiency water heaters; include daylighting; enhanced building envelope insulation; and blower door home energy rating system verified envelope leakage. MM-GHG-8 through MM-GHG-10 require water efficient toilets; waterless urinals; and water efficient faucets. MM-AQ-10 requires the use of light colored solar-

reflecting paving. Finally, MM-AQ-6 requires all buildings constructed to achieve 2023 LEED Silver certification standards or equivalent.

Regarding design considerations, the Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. Leaving the Campus Development, Brown Street would be the first cross-street. Cactus Avenue will be channelized or otherwise signed to prevent trucks from turning left onto Brown Street. Further, the intersection of Alessandro Blvd. and Brown Street is channelized and signed to prevent trucks from turn left and traveling west on Alessandro Blvd. The Cactus Avenue ramps onto southbound I-215 and northbound I-215 are approximately ¼ miles and ½ miles, respectively, directly past the next cross-street, Meridian Parkway.

Table 3-2 Development Standards, of the Specific Plan requires Business Park and Mixed Use buildings greater than 100,000 square feet to be set back a minimum of 800 feet from residential and buildings 100,000 square feet or less to be set back a minimum of 300 feet from residential. Industrial buildings must be set back a minimum of 1,000 feet from residential. In addition, any industrial-use building will require a 1,000-foot setback from existing residential to any proposed truck courts or loading docks. Section 3.5.4, Off-Street Loading Facilities, and Section 4.4.2, Truck Courts and Loading Docks, of the Specific Plan require truck courts and loading docks to be oriented away or screened to reduce visibility public roads, publicly accessible locations within the West Campus Upper Plateau Specific Plan, and surrounding residential properties, and prohibits loading and unloading activities within view of public streets or residential land uses. Section 3.5.4, Off-Street Loading Facilities, requires loading or unloading facilities to be sized and located so that they do not require trucks to be located in required front or street side yards during loading and unloading activities, ensuring trucks do not spill onto surrounding public streets. Parking and maintenance activities are restricted to designated service areas, which will prevent these activities, including overnight parking, occurring on public streets. MM-AQ-12 requires an on-site signage program that clearly identifies the required on-site circulation system. MM-AQ-15 requires signage clearly identifying the approved truck routes to be installed along the truck routes to and from the project site and within the project site.

COMMENT RA-6.5

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

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

2) *South Coast AQMD 2022 South Coast Air Quality Management Plan,12 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 Measures*

3) *United States Environmental Protection Agency (U.S. EPA): Mobile Source Pollution - Environmental Justice and Transportation*

RESPONSE RA-6.5

Please see Response RA-6.4, above. All feasible mitigation measures have been incorporated into the Project.

COMMENT RA-6.6

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. 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. 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 EIR 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.

RESPONSE RA-6.6

The analysis conservatively assumes that each industrial, business park, and mixed use parcel would include installation of a stationary emergency generator. Each generator was estimated to operate for up to 1 hour per day, 1 day per week, for up to 50 hours per year for maintenance and testing purposes. Because these emergency engines are each expected to exceed a rating of 50 horsepower, it is anticipated that each emergency engine would require an SCAQMD air permit. MM-AQ-24 prohibits the use of diesel-powered back-up generators, unless absolutely necessary, and then only Tier 4 Final or better. Modeling Tier 4 generators for the mitigated scenario conservatively understates the emissions reductions under MM-AQ-24 to provide the "worst case scenario." Should any additional stationary equipment be required, March JPA will inform SCAQMD as the responsible agency. However, at this time it is unknown what other types of equipment may be required, and as such it would be speculative to include stationary equipment beyond the anticipated emergency generators.

M. MCCARTHY LETTER RI-254

COMMENT RI-254.102

Gasoline exhaust from passenger light-duty vehicles is carcinogenic. Gasoline includes multiple carcinogens – most notably benzene. Gasoline exhaust that comes out of the tailpipe includes incomplete combustion byproducts that are not fully oxidized by the catalytic converter – most notably 1,3-butadiene, acetaldehyde and formaldehyde.

The U.S. Clean Air Act Amendments regulated 187 hazardous air pollutants (air toxics) that are associated with a wide variety of adverse health effects, including cancer, neurologic effects, reproductive effects, and developmental effects. Cars are a major source of cancer risk in the U.S. and Southern California based on measurement9,10 and modeling studies11,12. A traffic-related air pollution meta-analysis from the Health Effects Institute summarizing 353 health studies identified high confidence in all-cause mortality, circulatory mortality, ischemic heart disease mortality, and moderate to high confidence in lung cancer mortality, asthma onset, and acute lower respiratory infections associated with traffic-related air pollution exposure.13

The U.S. EPA has a mobile source air toxics program which lists rules controlling hazardous air pollution from gasoline vehicles, a list of compounds in gasoline-vehicle exhaust, and many other sources of this information.

Given that gasoline exhaust contributes to cancer risk, it is important to model it in a health-risk assessment. This should have been identified in the hazard identification stage of the HRA where the list of potential health problems that a chemical can cause are listed14. It is certainly true that gasoline powered vehicles have a smaller per vehicle impact than the heavy-duty trucks, but there 30,000 passenger vehicle trips associated with this project per day. It is important to include their cumulative emissions of benzene, 1,3-butadiene, acetaldehyde, and formaldehyde in the HRA for completeness since the passenger trips outnumber truck trips by a factor of 15.

Additionally, it should be noted that all passenger vehicle trips associated with warehouse uses surrounding the communities should be included. Please include trips from County of Riverside, City of Riverside, and MJPA warehouses on Alessandro, Van Buren, Krameria, and Meridian Parkway in the analysis.

RESPONSE RI-254.102

See Response RA-6.3, above. It should be noted that HRAs prepared for warehouse projects typically do not include risk from passenger vehicle emissions, as risk from diesel truck exhaust is the primary driver of risk for these projects. Similarly, projects such as large shopping centers that attract similar numbers of passenger vehicles but relatively few trucks are not required to prepare health risk assessments. Thus, information to quantify cumulative risk from passenger vehicle exhaust is not readily available. The comment further requests the inclusion of passenger vehicle trips associated with existing development in surrounding communities. Since these projects are already built out, they represent the existing condition, and emissions related to these projects would be included in SCAQMD's latest MATES study. Regarding cumulative projects, as noted in Response RA-6.3, even if 15% were added to the cumulative projects consistent with the methodology in Response RA-6.3, the Project's cumulative total would remain significantly less than the cumulative threshold of 100 in one million used by EPA and March JPA.

COMMENT RI-254.103

Figure 4.2-1 shows the 'Construction Areas' modeled in the HRA and the selected Sensitive Receptors alongside the project boundaries. Exhibit 2-A in Revised Technical Appendix C-2 shows a different set of modeled construction activity boundaries. Both are shown below for completeness. I can't tell from the description in the text (REIR or appendix) how emissions are actually allocated within the project area, but the text in the REIR states that on p.4.2-24 'Because this construction would be limited in scope, short-term, and intermittent in nature, and cease upon completion, and resulting health impacts to nearby sensitive receptors would be negligible related to construction of the proposed Project and would not materially affect the determination of the maximum exposed individual receptors for the purposes of this health risk assessment.' There are no quantified values for the duration, extent, or intermittent construction phase emissions nor any actual modeling to assess exposure for homes within 10 feet of construction activity. It is not reasonable to assert those emissions and exposures are negligible a priori. This is attempting to piecemeal the project; omitting portions of the project violates the principle of considering the 'entirety of an action'.

Secondly, the distances shown in Figure 4.2-1 are incorrect, because they are taken from the Specific Plan construction zone, rather than the actual construction areas, as shown in Exhibit 2-A. A few key examples are identified.

- *Receptor R8 is identified as 794 feet from Area 7. It is 150 feet from Barton Drive construction zone in Exhibit A-2.*
- *Receptor R13 is identified as 979 feet from Area 10. It is 277 feet from the Recycled Water Tank pad and 350 feet from Grove Community Dr construction areas.*
- *Receptor R11 is identified as 304 feet from Area 1. It will be less than 5 feet from the Barton Drive extension.*
- *There are at least 30 homes along Greenock Way, Barton Drive, and Grove Community Drive which have property lines adjacent (within 25 feet) of the construction areas. This is also true for The Grove Church, which is adjacent to the proposed construction zone on Barton Drive.*
- *The Development Agreement p.44 mentions the construction of a Fire Station on Meridian Parkway and Opportunity Way which was evaluated piecemeal under a separate EIR. An existing commitment cannot be considered a 'community benefit' or part of this project unless it is evaluated for its environmental impacts in this EIR. This is piecemealing the*

benefits to this project REIR while piecemealing its impacts to the previous EIR – not allowed under CEQA.

Even if the grading, digging, trenching, filling, building, and paving activities along the roadways are transient, they are clearly part of the construction phase and need to be modeled explicitly to assess maximum exposed individual receptors. Given that the Air Quality section claims to be 'conservative' in its assumptions, it needs to include modeling assumptions which incorporate emissions from construction that will be within 10 feet of residential property along Grove Community Drive and Barton Drive. Asserting that these emissions are 'negligible' is not sufficient, especially given the proximity to homes. Construction emissions right on top of people's homes will be a large part of the exposure for these residents. Emissions drop off exponentially in the first few hundred feet; construction emissions will be within 10 feet and likely to be at least 3 to 10 times higher concentration than emissions modeled at 300 to 800 feet.

In addition to failing to properly model the construction emissions from the project by spatially allocating emissions away from sensitive receptors and within the specific plan area, the construction emissions modeling omits known construction sites that are cumulatively considerable, including the Sycamore Hills Distribution center project across Alessandro Blvd, Meridian West Building 4 on Meridian Parkway, and South Campus Buildings F, G, H, I, 3, and 4. These construction related emissions are occurring both within the March JPA planning area and across the street within the City of Riverside. The Sycamore Hills distribution center is within 1,000 feet of residential homes in the Camino del Sol neighborhood, with maximum receptors being in the north of the neighborhood. The cumulative impact of construction emissions from the multiple projects needs to be included – as this community is impacted by construct emissions sources to the East, North, and South of the project that are.

The construction omissions and incorrect boundaries for spatial allocation appear deliberate, as all of these issues were brought up in my March 9th 2023 letter on the EIR. As an expert in air quality with multiple papers evaluating the validity of the AERMOD model near line sources of emissions, it is my expert opinion that these omissions will substantially underestimate true exposures for sensitive receptors and will potentially misidentify maximum exposed individual receptors.

RESPONSE RI-254.103

The comment includes two figures: Figure 4.2-1 of the EIR, which identifies sensitive receptor locations in relation to the Specific Plan Area and Exhibit 2-A detailing the modeled construction emissions sources. The construction HRA assumed that construction-source emissions would occur over the Project site (denoted by the area in red in Exhibit 2-A) over the entirety of the 4.35 years of construction. Exhibit 2-A has been updated to include the distances from the sensitive receptors to the modeled construction emissions sources. Figure 4.2-1 of the EIR (also Exhibit 2-D of the Project HRA) has been updated to clarify the distances are provided for operational emissions. Although not modeled separately, the offsite construction emissions are included in the overall Project DPM emissions as stated in the Project HRA.

As shown on the revised Exhibit 2-A, the closest sensitive receptor (Receptor 11) is 32 feet from construction activities, specifically the northern Barton Street extension and the Mixed Use parcels of the Specific Plan Area. This distance is conservative, as although the comment states that construction activities would occur less than 5 feet of Receptor R11, Receptor R11 was placed at the edge of the backyard facing construction activities, and the analysis assumes that a

newborn would be outside and exposed to construction emissions daily for 4.35 years. The mitigated construction health risk at Receptor R11 is 0.56 in one million, well below the SCAQMD significance threshold of 10 in one million. As noted in the EIR and Project HRA, TACs generally dissipate with distance from the source. Compared to Receptor R11, all other modeled residential receptors are exposed to lesser concentrations and are located at a greater distance from the Project construction-source emissions. Therefore, all other residential receptors in the vicinity of the Project site would be exposed to less emissions and therefore less risk than identified for Receptor R11 herein. This includes the homes along Greenock Way near the northern Barton Street extension as these homes are further away from the Campus Development construction compared to Receptor R11. Additionally, Receptor R7[6] and the homes along Grove Community Drive and Barton Drive in the vicinity of the offsite construction activity[7] would not be exposed to construction source emissions to the extent or duration compared to Receptor R11 – the mitigated construction health risk would be below 0.56 in one million. Offsite construction would occur over a significantly shorter duration than construction of the Project itself. As such, since the mitigated construction health risk at Receptor R11, the maximally exposed individual receptor (MEIR), is well below the SCAQMD significance threshold, the Project will not cause a significant human health or cancer risk to nearby residences from any on-site or off-site construction activity.

As shown on the revised Exhibit 2-A, construction sources were placed along the Barton southern extension for a distance of approximately 1,250 feet south of the Campus Development, which places these sources within 80 feet to the preschool at Receptor R8. At the maximally exposed individual school child (MEISC), the maximum incremental cancer risk impact attributable to the Project construction activity is 0.05 in one million, which is less than the significance threshold of 10 in one million. The analysis conservatively assumed that these sources would be active the entire 4.35 years of Project construction, even though actual construction activities in this area would be significantly shorter.

For clarity purposes, the receptors selected represent the individual residences in these communities that would experience the highest pollutant concentrations, and thus risk, during construction and operation of the proposed Project. Because none of these locations would experience risk greater than the SCAQMD significance threshold of 10 in one million, risk resulting from construction of the proposed Project would result in a less than significant impact.

As noted in the Project HRA, construction emissions were modeled using volume sources covering the site to represent on-site construction equipment emissions, and line volume sources to represent off-site on-road vendor and haul truck traffic. The red area presented on Exhibit 2-A accurately presents the placement of volume sources on the site. Sources were placed in locations where construction activities would occur, including those in locations near sensitive receptors.

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[6] The comment identifies Receptor R13, but this is a worker receptor 4,113 feet east of the Project. Receptor R7 is located 979 feet from Campus Development construction activities.

[7] Offsite construction includes an aboveground 0.5-million-gallon prefabricated, bolted steel tank on a poured concrete slab next to an existing water tank on an already disturbed and graded site and installation of a waterline along Grove Community Drive.

Regarding construction activities on other projects in the area, the schedule of construction activities for these is not known at this time. However, due to the distance between the proposed Project and other cumulative projects in the area, the short term nature of construction activities, as well as the likelihood that these construction activities would not overlap, and the fact that the proposed Project's MEIR and MEISC risk is well below the SCAQMD significance threshold of 10 in one million, Project construction emissions would not result in a significant cumulative health risk impact.

COMMENT RI-254.104

The HRA consultant arbitrarily decided that pollution effects of emissions sources like Freeways, warehouses, and truck arterial routes should not be evaluated beyond 1,000 feet based on a misinterpretation of the secondary literature on Land Use. The only citation for that decision is the CARB Air Quality and Land Use Handbook (2005). In the handbook, associations of health impacts from living near freeways were found within 1,000 feet, and were strongest within 300 feet, as expected for any pollution gradient near an emissions source. Distribution Centers with TRUs were found to have increased cancer risk out to 3,300 feet in Figure 1-2 from the CARB handbook, not 1,000 feet. Figure 1-3 shows the relationship between distance and relative concentration from an area emissions source drops off by a bit more than 80% by 1,000 feet, and down by about 96% by 2,000 feet. However, total concentrations are still not down by 99% at even 6,000 feet from the emissions source. Concentration drop-offs near emissions sources are asymptotic but will still be cumulatively considerable if (1) any of the emissions sources are large and (2) if there are many small emissions sources contributing.

In the case of the West Campus Upper Plateau, there are both (1) large emissions sources nearby (the 215 Freeway and March Air Reserve Base) and (2) many small emissions sources contributing (the more than 20 million square feet of existing warehouses within 1 mile of the Project Location; see Table 2 from Cumulative Impacts letter on the Draft EIR dated March 9, 2023). This ignores tens of millions of square feet of warehouses and their truck and passenger car impacts in the City of Riverside, March JPA planning area, Mead Valley, Moreno Valley, and Perris. These are obviously cumulatively considerable – just look at the 215 Freeway (omitted from the HRA), which has 15,000 trucks northbound and 14,000 trucks southbound daily based on Caltrans truck AADT counts.

Air pollution dispersion modeling clearly indicates that pollution goes beyond 1,000 feet and needs to be evaluated within the specific context of urban air toxics modeling. Urban air toxics modeling guidance from the US EPA recommends including sources out to 50 km or including it as background.8 The arbitrary 1,000 foot boundary is a faulty analysis that would suggest that a facility like the Port of Los Angeles has no impact on nearby communities because it is setback more than 1,320 feet from residential receptors. Cumulative magnitude of emissions is the key factor and setting an arbitrary boundary for the scope of the analysis at a value of 1,000 feet is clearly not conservative.

Choosing to omit cumulatively considerable sources of emissions from the HRA is tantamount to admitting the cumulative impacts are significant and unavoidable. And the data from the 2018 MATES V modeling15 study clearly shows that the cumulative impacts are cumulatively considerable –

- *Zip Code 92518 has a population-weighted average inhalation cancer risk of 359 per million – 70.8% (254 per million) of which is from diesel PM, 9.5% of which is from benzene, and 7.0% of which is from formaldehyde.*

- *Zip Code 92508 has a population-weighted average inhalation cancer risk of 331 per million – 69.5% (231 per million) of which is from diesel PM, 10% from benzene, and 7.3% from formaldehyde.*

It is not clear how the MJPA can possibly explain how residents are exposed to an average diesel PM cancer risk exceeding 200 per million based on their novel 1,000 foot exposure distance analysis. The only way to come up with an answer below 10 per million risk is to exclude sources that are cumulatively impactful by arbitrarily excluding the cumulatively considerable impacts of land-use on the area. And as I have extensively noted and documented in multiple letters, the MJPA is excluding sources both large and small from their cumulative impacts analyses.

RESPONSE RI-254.104

As detailed in the Project HRA, SCAQMD does not have an approved methodology for evaluating cumulative TAC health impacts. The Project HRA used the EPA's guidance for air toxic analyses at the community scale and the threshold of a cancer risk of 100 in a million or less to be within the "acceptable" range of cancer risk. As stated in the Project HRA, the 1,000-foot evaluation distance is supported by research-based findings concerning TAC emission dispersion rates from roadways and large sources showing that emissions diminish substantially between 500 and 1,000 feet from emission sources. To support the 1,000-foot evaluation distance, the Project HRA references traffic-related studies, CARB and SCAQMD emissions and modeling analysis, the Waters Bill, and the 2021 report *Evaluating Siting Distances for New Sensitive Receptors Near Warehouses*, prepared by the Ramboll Group.

Additionally, it should be noted that significant emission standards for TRUs have been implemented since CARB's 2005 Land Use Handbook was published, most notably CARB's Airborne Toxic Control Measure for TRUs. As such, given the significant reduction in emissions that has occurred and will continue to occur as new regulations and emission standards take effect, the 3,300 feet distance cited in the comment is outdated.

Regarding Figure 1-3 in CARB's Land Use Handbook, the figure demonstrates that risk reduces rapidly with distance from the source and appears to be asymptotic, approaching but not reaching zero risk at 6,000 feet. However, for purposes of determining the significance of cumulative health impacts, this reinforces that risk drops rapidly with distance from the source. It has been demonstrated that the Project would have less than significant health impacts for sensitive receptors located near the Project site. Based on this figure, it is expected that the risk introduced by other similar facilities located further from the Project site would be minimal and considered less than significant.

Regarding the SCAQMD MATES study health risk data, it should be noted that the estimated background risk presented in this study represents existing conditions and includes contributions from emission sources located throughout the basin, including heavy industrial facilities, power plants, refineries, gas stations, and mobile and stationary sources. DPM emissions that contribute to the background cancer risk are not attributable to any specific facilities or uses and are the result of diesel-powered vehicles traveling on roadways throughout the basin.

While SCAQMD does not provide specific guidance for evaluating cumulative health risk impacts beyond the use of the incremental cancer risk threshold of 10 in one million on an individual

project basis, BAAQMD utilizes a 1,000-foot zone of influence approach for evaluating cumulative health risk impacts and a threshold of 100 in one million that is supported by the EPA[8]. March JPA therefore used this methodology that was approved by an expert air district to respond to comments related to cumulative health impacts. The analysis in the EIR demonstrates that Project emissions would not result in a significant cumulative health impact.

COMMENT RI-254.105

In my March 9, 2023 draft EIR letter on Air Quality titled 'AQ.pdf', I clearly noted that there are many errors in the project description because the air quality model inaccurately showed the wrong number of dock doors and buildings. Rather than fix this issue, the lazy modeler just fixed the underlying figure but did not change anything about substantive about the spatial allocation of emissions. The MJPA doubled down on the inaccurate AQ modeling and are insisting that the inaccurately modeled dock doors were fine for the project. Exhibit 2-B shows only 3 industrial buildings, 5 mixed-use warehouses, and 7 business park warehouses. As described in the project, there are 4 (not 3) industrial buildings, and there are 10 business park warehouses (not 7). Spreading the emissions around in accordance with the IS/NOP project plan buildings is inaccurate and again demonstrates the instability of the project REIR.

Appendix C-2 Table 2-4 shows exactly how that error plays out. There are 3 industrial parcels (A, B, and C) and 7 business park parcels (D, E, F, G, H, J, and K) modeled explicitly – the buildings themselves are not accurately modeled. In addition to the inaccurate spatial allocation of emissions, it also results in an undercounting of the number of dock doors, the emissions rates, and truck trips associated with the buildings – this is a direct underestimate of the emissions and an inaccurate spatial allocation of the peak emissions location.

Specifically, the truck trips per day in Table 2-4 are inaccurate, the dock doors for Building A and many of the business park buildings in the north of the project are inaccurate, as are the TRU allocations which should be restricted to Building A only (the cold storage warehouse).

- *Building B - 1,250,000 SQ FT high cube fulfilment center warehouse is about 0.51 (640 trips per day)*
- *Building C – 587,000 SQ FT high cube fulfilment center warehouse is about 0.49 (290 trips per day)*
- *Business Park warehouses – 1,280,400 SQ FT of business park warehouses is about 0.39 (513 trips per day)*
- *Mixed Use warehouses – 482,800 SQ FT of business park mixed-use warehouses is about 0.39 (194 trips per day)*
- *Building A = 500,000 SQ FT cold storage warehouse **and** 725,600 SQ FT of high-cube fulfilment center warehouse is about **0.33** (418 trips per day).*

[8] BAAQMD. 2023. 2022 California Environmental Quality Act Air Quality Guidelines. Revised April 2023. https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/ceqa-guidelines-chapter-5-project-air-quality-impacts_final-pdf.pdf?rev=de582fe349e545989239cbbc0d62c37a&sc_lang=en.

The high-cube fulfilment center should have a truck trip rate of ~0.5 truck trips per 100k SQ FT/day, consistent with Building B and Building C rates. The high-cube cold storage warehouse truck trip rate in the ITE Trip Generation Manual, 11th edition is 0.75 truck trips per 100k square feet. Equation 1 shows the number of truck trips per day in the two warehouses in building(s) A should be 738 truck trips per day.

*Equation (1) --- 500k * 0.75 + 725.6k * 0.5 = 738 Truck trips per day*

Thus, the number of daily truck trips is underestimated by about 320 trips per day and is spatially allocated incorrectly. Yet again, each and every one of the errors systematically biases the truck trips low.

RESPONSE RI-254.105

As part of this Project, there are only site plans for Buildings B and C. However, for modeling purposes, the analysis assumed buildings on the remaining parcels and placed dock doors and loading areas in compliance with the development standards in the proposed Specific Plan. The number of idling trucks and TRUs is based on the Project Traffic Analysis and the building square footage, not the number of loading docks, thus the number of loading docks or dock doors would not affect the analysis. There are not four industrial buildings. There are three industrial parcels and therefore, three industrial warehouse buildings were modeled and analyzed, not four as the comment alleges. The comment makes the inaccurate assumption that, the 500,000 square feet of cold storage and 725,600 square feet of high-cube fulfillment center warehouse would be two separate buildings on the remaining industrial parcel.

The modeling of the Project's Business Park square footage was based on an earlier site plan which included four business park parcels at the northern end of the Specific Plan Area, with the same square footage and mix of uses as is included in the current site plan. In response to this comment, Urban Crossroads analyzed seven business park parcels at the northern end of the Specific Plan Area, for a total of 10 business park buildings. Please see Exhibit 2-B, Table 2-4, and AERMOD modeling outputs presented in Attachment A for additional information in support of this response.

The results of this analysis indicate that cancer risk at the MEIR would be 4.55 in one million at Receptor R2 without mitigation and 2.23 in one million at Receptor R12 with mitigation. Risk at the MEISC, the preschool at Receptor R8, would be 0.65 in one million without mitigation and 0.33 in one million with mitigation. The EIR is overly conservative as the cancer risk at the MEIR previously disclosed would be 5.26 in one million without mitigation, the request by the commenter actually results in a reduced risk estimate of 4.55 in one million without mitigation as previously discussed.

The comment makes the inaccurate assumption that, for purposes of air quality analysis, the 500,000 square feet of cold storage and 725,600 square feet of high-cube fulfillment center warehouse would only be situated on the remaining industrial parcel. Under the Specific Plan, the remaining industrial parcel could have a building up to 1,225,600 square feet. Up to 500,000 square feet of cold storage would be allowed on Industrial parcels, including Buildings B and C. The analysis accounts for the possibility that, while the allowed square footages on each parcel would remain the same, the ultimate uses (cold storage or high-cube fulfillment) could shift. As previously noted, the Project HRA is consistent with the Project Traffic Analysis, which only breaks

out truck trips for Buildings B and C (both of which have proposed site plans). The remaining truck trips are split between high-cube cold storage warehouse, remaining industrial: high-cube fulfillment, business park warehouse, and business park mixed-use land uses. Additionally, because it is not known at this time in which buildings the high-cube cold storage warehouse uses would be placed, these truck trips were allocated between Buildings B, C, and the one building on the remaining industrial parcel based on the square footage for each building, proportional to the overall cold storage space allowed. As such, it is expected that the truck trip rates vary for each building based on the intended use of the building and allocation of cold storage trips. The analysis accounts for all daily truck trips identified in the analysis, and the manner in which these are apportioned between the various buildings would not alter the results of the analysis.

COMMENT RI-254.109

The business park and mixed-use components of the project are modeled as 'Office Park' in CalEEMod. Office Park is defined as a 'office buildings and support services, such as banks, restaurants, and service stations.' This is not consistent with the industrial land use of Business Park and Mixed Use (warehouse enterprise) described in the March JPA general plan. Please use Industrial Park or General Light Industry or justify why Office Park is the most appropriate land use type.

RESPONSE RI-254.109

The business park and mixed-use parts of the Project were modeled in CalEEMod as "office park" as CalEEMod does not include business park or mixed-use land types. As such, the office park land use was utilized. However, because the trip rates in CalEEMod were updated to reflect those utilized in the Project Traffic Analysis, the modeling accurately accounts for the trips and emissions associated with this portion of the Project, and the selection of this land use category would not affect the mobile source emissions calculated by the model. However, it should be noted that CalEEMod default energy usage factors are based on the land use type that is selected. In the model, default energy usage factors for the Office Park and Industrial Park land uses are identical, and these energy usage factors for Office Park are higher than the defaults for the General Light Industry and Unrefrigerated Warehouse land uses. Thus, because warehouse uses are allowed in the Business Park, the selection of the Office Park land use in CalEEMod is conservative.

The trip generation rates utilized for the Project AQIA are shown in Table 4-1 of the Project Traffic Analysis. These rates are obtained from the ITE Trip Generation Manual (11th Edition, 2021) and the WRCOG High Cube Warehouse Trip Generation Study (WSP, January 2019) for the industrial uses. These sources are the industry standard in determining the proposed Project trip generation, as they are based on data from similar use facilities. The land uses evaluated in the Project Traffic Analysis are the most similar land use types to the function and operations of the proposed Project. Based on the ITE description for Business Park, the average mix is 20 to 30 percent office/commercial and 70 to 80 percent industrial/warehousing. As such, 30% of the business park area has been designated as office related uses, while the remaining 70% of the business park area has been allocated to warehousing uses. This 30/70 split is not intended to reflect office space within a warehouse but rather to capture other foreseeable uses allowed with the Business Park land use designation under the proposed West Campus Upper Plateau Specific Plan.

COMMENT RI-254.110

- *Omitted the loss of soil carbon accumulation by existing land use in CalEEMod table 4.10.1 and 4.10.2*
- *Omitted the disturbance of soil carbon sequestration by grading land in CalEEMod table 4.10.1 and 4.10.2*

RESPONSE RI-254.110

Carbon accumulation in soil and carbon sequestration is the process of capturing and storing atmospheric carbon dioxide. California Emissions Estimator Model (CalEEMod) does include options in the modeling to account for loss of soil carbon accumulation and carbon sequestration. However, there are many factors that affect the amount of soil carbon accumulation and carbon sequestration from soil and vegetation (soil type, vegetation type, the amount of water the vegetation receives, the age of the vegetation). As noted in Table 4.3-7, Vegetation Communities and Land Uses Project Impacts within the Study Area, the majority of the acreage to be impacted by the Project is non-native grasslands and other disturbed vegetation communities. MM-BIO-8 and MM-BIO-9 require mitigation ratios to account for Project impacts to upland vegetation communities and riparian communities. To further increase carbon sequestration, in addition to Conservation Easement, there is an additional 120-foot landscaped buffer interface on the north side of the Specific Plan Area (see Figure 4-17 of the proposed Specific Plan). As required by the Specific Plan, roadways would include trees and landscaping along sidewalks. Section 4.5.5, Landscape Design Guidelines, of the Specific Plan and March JPA Development Code Section 9.17.040(D) require 40 feet on center tree spacing, a minimum size of 24-inch box for trees in public ROW, and on-site landscape trees to be a minimum of 60% 24-inch box trees and 40% 15-gallon trees. Finally, on-site trees shall be a minimum of 80% evergreen and no more than 20% deciduous. Table 7-1 of the proposed Specific Plan outlines the maintenance responsibilities for the common area landscaping, which will be managed through either a Landscape and Lighting Maintenance District or a Community Facilities District. Because of the numerous variables that go into quantifying carbon sequestration and the wide range of factors that can be used in quantifying carbon sequestration, any estimates quantifying the net change would be highly speculative. Therefore, quantifying a change in carbon accumulation in soil and carbon sequestration would not result in any meaningful information that would alter the findings of the Recirculated Draft EIR.

COMMENT RI-254.111

- *P.4.2-5 - The project is not within the SR-60 NO_2 nonattainment area for California Ambient Air Quality Standards, but the project will contribute vehicle trips and emissions to SR-60 that will impact the nonattainment status. Warehouses are an indirect source that attracts pollution, thus the warehouse ISR rule.*

RESPONSE RI-254.111

While the Project will likely contribute some amount of vehicle trips to SR-60, it would be overly speculative to estimate the trips and emissions that would traverse the nonattainment section of SR-60. It should be noted that the proposed Project, as well as other warehouses in the vicinity that are 100,000 square feet or greater, would be required to comply with SCAQMD Rule 2305,

the Warehouse Indirect Source Rule. This rule requires warehouse operators to directly reduce nitrogen oxide and particulate matter emissions, or to otherwise facilitate emission and exposure reductions of these pollutants in nearby communities.

COMMENT RI-254.114

- *P.4.2-25 - Cumulatively, about 25% of inhalation cancer risk in Southern California is due to benzene, formaldehyde, acetaldehyde, and 1,3-butadiene as shown in MATES V Figure ES-216; 50% of cancer risk is from diesel PM. The gasoline exhaust pollutants are excluded from the HRA and haven't been added in response to my comments in the draft EIR. Please explain why these pollutants are not analyzed given the 30,000+ daily passenger vehicle trips predicted for this project and the increased exposure of residents near Barton Dr..*

RESPONSE RI-254.114

Please see Response RI-254.102, above, for a response to this comment. While 50% of cancer risk in the basin may be attributed to DPM emissions, this does not mean that the remaining 25% is attributable to passenger vehicle emissions as stated in the comment. It should be noted that diesel vehicle exhaust also contains benzene, formaldehyde, acetaldehyde, and 1,3-butadiene and contributes to the basin-wide cancer risk from these chemicals as well[9]. The risk from these compounds are included in the risk calculated for DPM from the Project's trucks and emergency generators. Stationary sources, including power plants, refineries, manufacturing facilities, boilers, and gas stations are also significant contributors to basin-wide cancer risk. As such, the analysis does not significantly underestimate risk. The comment mentions potential increased exposure of residents near Barton Street. The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. The majority of the Project's passenger vehicle trips will utilize Cactus Avenue (see Exhibit 4-2 of the Project Traffic Analysis – Appendix N-2). Approximately only 1-2% of passenger vehicle trips will access Barton Street.

Additionally, it should be noted that the contributions to cancer risk cited in the comment represent an average for the South Coast Air Basin as a whole. Per the MATES-V study, in the vicinity of the proposed Project, diesel particulate matter contributes approximately 70.8% of the cancer risk, while benzene and formaldehyde contribute 16.5%. However, it should be noted that diesel particulate matter emissions are not limited to truck travel alone, including other sources such as construction equipment, stationary engines, power plants, etc. Similarly, benzene and formaldehyde emissions are not limited to gasoline exhaust, as these pollutants are emitted by heavy industrial facilities and gas stations as well.

COMMENT RI-254.116

Why are dock door locations and cold storage locations identified for each of the industrial buildings when they can only be in a single 500,000 square foot area? This is not a conservative approach because distributing the emissions spatially throughout the three industrial parcels DILUTES the spatial impact of having them all located at a single 500,000 SQ FT warehouse, which is most likely to be closest

[9] https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health

to the pretend park as shown in Fig 3-7D. This will concentrate TRU emissions on the kids – nice job MJPA!

RESPONSE RI-254.116

While the total cold storage use within the Specific Plan Area is limited to 500,000 square feet, these uses could be spread between Buildings B and C, and the one building on the remaining industrial parcel, rather than incorporated into a single building. Although the cold storage uses may be spread between multiple buildings, they would be restricted to the industrial portion of the Specific Plan Area, as was modeled in the analysis, and would not be placed in the mixed use or business park areas such as those nearest the park. Placing the Project's cold storage uses on each industrial parcel does not "dilute" the emissions over a larger area; instead by modeling the cold storage uses between Buildings B and C and the one building on the remaining industrial parcel, the analysis conservatively evaluates cold storage uses as being placed closer to the edges of the Project site than may otherwise be occur if the cold storage uses were all placed in a single building located on the remaining industrial parcel.

COMMENT RI-254.117

Missing an emergency generator for the fourth industrial building north of Cactus Avenue and west of Linebacker Drive.

RESPONSE RI-254.117

There are not four industrial buildings. The comment makes the inaccurate assumption that, the 500,000 square feet of cold storage and 725,600 square feet of high-cube fulfillment center warehouse would be two separate buildings on the remaining industrial parcel. The model assumed 3 industrial buildings – Buildings B and C and one on the remaining industrial parcel. Therefore, one emergency generator was modeled at this location as shown the Health Risk Assessment (See Exhibit 2-B: Modeled On-Site Emission Sources, Pg 21 of the Project HRA).

COMMENT RI-254.118

Truck movements from the project are again incorrect as shown in Exhibit 2-C Modeled Off-site emissions.

- *No trucks take Brown St to Alessandro Blvd. And no trucks take Alessandro Blvd to the 215 Freeway, as if Cactus Ave will never be backed up. Please model ALL allowed truck routes or justify why zero percent of trucks will go on Brown St to Alessandro Blvd in real-world traffic conditions.*
- *Please model off-site MJPA and City/County Truck Arterial routes. Again, the project excludes Brown St., Alessandro Blvd, 215 freeway, Van Buren, Krameria, etc.*

RESPONSE RI-254.118

The truck routes modeled in the Project HRA are consistent with those identified in Exhibit 4-1 in the Project Traffic Analysis, which identifies the most logical and direct truck routes. The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. As such, only the park and open space amenities will be accessible off Barton Street, and the parcels within the Campus Development can only be accessed via Cactus Avenue. Leaving the Campus

Development, Brown Street would be the first cross street. Cactus Avenue will be channelized or otherwise signed to prevent trucks from turning left onto Brown Street. Further, the intersection of Alessandro Boulevard and Brown Street is channelized and signed to prevent trucks from turning left and traveling west on Alessandro Boulevard. The Cactus Avenue ramps onto southbound I-215 and northbound I-215 are approximately ¼ miles and ½ miles, respectively, past the next cross-street, Meridian Parkway.

Consistent with standard practice, the Project HRA analysis models off-site truck travel that would occur on nearby surface streets, as detailed in Exhibit 2-C. Once trucks enter the state highway system they can go to various locations, and because their destinations are not known, it would be speculative to include this in the modeling. Results of the modeling indicate that the highest concentrations of diesel particulates would occur in the vicinity of the Project site where travel speeds are slower, and idling would occur rather than on surrounding roadways where travel speeds are higher.

COMMENT RI-254.119

- *Passenger vehicle movements from the project still don't sum to 100. Why do only 98% of the passenger vehicle trips originate through Cactus Ave?*
    - *Please model cancer-risk HRA analysis for passenger vehicle trips from the 30,000 passenger vehicles in the project. There are 15x more passenger trips daily than truck trips – they need to be accounted for.*

RESPONSE RI-254.119

As shown in Exhibit 4-2 of the Project Traffic Analysis, while 98% of passenger vehicle trips are anticipated to use Cactus Avenue, approximately 1-2% of the passenger vehicle trips would utilize the Barton Street extension, to access the Park for example. Please see Response RA-6.3 regarding passenger vehicle emissions and the Project HRA.

COMMENT RI-254.121

Table 2-4 and 2-5 TRU calcs

- *Why are TRU emissions rates not consistent on a per-truck basis across Bldg. A, B, and C? Emission rates in Bldg. A TRUs are 20-40% higher than Bldg. B or C TRUs. TRUs should not vary by building with the same idling times on a per-truck normalized basis, but they do. Maybe the TRUs are unevenly allocated in a weird way? Your text says you did it on a per-truck basis by square footage, but the emissions show that isn't true.*
- *TRU on-site travel TRU emissions should be in the same ratio as the on-site travel exhaust emissions but are not. Honestly, they should all be in Bldg. A, but you botched that and spread them across every building and now somehow the ratios are very weird and inconsistent if it was just allocated on a per truck basis.*

RESPONSE RI-254.121

The comment further makes the inaccurate assumption that, for purposes of air quality analysis, the 500,000 square feet of cold storage and 725,600 square feet of high-cube fulfillment center warehouse would only be situated on the remaining industrial parcel. Under the Specific Plan, the remaining industrial parcel could have a building up to 1,225,600 square feet. Up to 500,000 square feet of cold storage would be allowed on Industrial parcels, including Buildings B and C.

The analysis accounts for the possibility that, while the allowed square footages on each parcel would remain the same, the ultimate uses (cold storage or high-cube fulfillment) could shift. The analysis apportioned cold-storage related trips to Buildings B and C and the one building on the remaining industrial parcel based on the square footage of each building, resulting in 71 TRUs being assigned to the one building on the remaining industrial parcel per day, 83 to Building B, and 34 to Building C for a total of 188 TRUs associated with 376 two-way cold storage truck trips per day, consistent with the Project Traffic Analysis. The analysis utilized an identical gram per hour per TRU emission rate for each building and roadway segment analyzed. As shown on the table below, each building utilized identical TRU emission rates obtained from EMFAC 2021.

TRU Idling Emissions

Building	TRU Emission Rate (g/hr/TRU)	TRUs/day	TRU Emissions (g/day)	
			Without Mitigation[1]	With Mitigation[2]
B	0.57	83	97.52	23.64
C	0.57	34	40.33	9.78
Remaining	0.57	71	83.59	20.26
Total		188	221.44	53.68

[1]Assumes each TRU operates for 2.1 hours while parked at building loading docks.
[2]Assumes each TRU operates for 30 minutes while on-site but not parked at building loading docks.

The on-site travel TRU and truck exhaust emissions differ because different numbers of truck and TRUs are assigned to each building based on the Project Traffic Analysis and the building square footage, as each building could include both cold storage and non-refrigerated uses. As noted above, an identical gram per hour exhaust rate was utilized for each TRUs, and these differences are based on the number of TRUs that were assigned to each building. The table below presents the emission rate and assumptions used for calculating TRU emissions that would occur during on-site and off-site travel.

TRU On-Site and Off-Site Travel Emissions

Road Segment	TRU Emission Rate (g/hr/TRU)	Segment Travel Distance (miles)	Travel Speed (mph)	TRU Trips/day	TRU Emissions (g/day)
On-Site Travel					
Bldg. B On-Site	0.57	0.94	5	166	17.87
Bldg. C On-Site	0.57	0.54	5	68	4.25
Remaining Bldg. On-Site	0.57	0.91	5	142	14.70
Off-Site Travel					
Cactus Ave. 40%	0.57	0.45	25	150	1.53
Cactus Ave. 100%	0.57	1.05	25	376	9.04
Airman Dr./Arclight Dr. 25%	0.57	0.42	25	94	0.90
Linebacker Dr./Arclight Dr. 30%	0.57	0.45	25	113	1.17
Airman Dr./Bunker Hill Dr. 15%	0.57	0.46	25	56	0.60
Linebacker Dr./Bunker Hill Dr. 30%	0.57	0.45	25	113	1.15
Sycamore Cyn Blvd. 5%	0.57	1.80	25	19	0.77

Meridian Pkwy. 10%	0.57	2.28	25	38	1.96
Cactus Ave. 85%	0.57	0.52	25	320	3.82
Cactus Ave. 3%	0.57	0.99	25	11	0.25

COMMENT RI-254.126

P. 1166 – cancer risk at Rubidoux is over 700-in-a-million, even though you cut off the zero axis

RESPONSE RI-254.126

The chart provided for cancer risk at the Rubidoux monitoring station was pulled directly from SCAQMD's MATES V study. As shown on the chart, cancer risk has been reduced significantly and continues to decline, from a cancer risk of 4,449.7 in 1998 to 771 in one million in 2018.

COMMENT RI-254.128

Table 4.2-16 is not a complete list of projects because it omits key buildings and MJPA cumulative truck routes. Figure 1 below shows the project site, a 1,000 foot project site buffer (dark red) a 1 km or ~3,000 foot buffer in orange, and a 1 mile (5,280 foot) buffer in yellow. Existing warehouses are overlaid in red, while planned/approved/under construction warehouses are in black. Truck routes are shown in blue.

RESPONSE RI-254.128

The warehouses noted in the comment are already constructed, and as such are representative of existing conditions. Accordingly, emissions from these facilities would be included in SCAQMD's MATES V study. The cumulative projects list includes projects that have been approved but not yet completed, and as such would not be captured by the SCAQMD MATES V study. The comment provides a figure showing 1,000-foot, 1-km, and 1-mile buffers around the Project site. However, those buffers are artificially inflated by including the Conservation Easement, as an area with Project emissions. Figure 4.2-2 (Exhibit 3-B of the Project HRA) correctly uses the Specific Plan boundary, which is conservative given it includes the proposed Park to the west. Please see cumulative analysis in the Project AQIA and HRA.

COMMENT RI-254.129

If the buffer was extended merely to 1 km from the Project site which would be more likely to capture any local gradients of pollution from individual sources that may have declined by 95% at that point, there are multiple additional truck route arterials that would need to be included to adequately model the area cumulatively. When one does that, the clear and most important thing to include is the I-215 Freeway (29,000 trucks daily as of 2021). The key thing about the I- 215 Freeway segment is over 5,000 of those daily truck trips are to/from the March JPA planning area. All 5,000 of those trucks go from a dead stop to accelerating to 65 mph and emit large quantities of diesel PM pollution in the process. It is a cumulatively considerable impact adding to a significant background of truck trips going to other warehouses permitted and entitled by MJPA planning agencies (Perris, Moreno Valley, County, City).

RESPONSE RI-254.129

This comment alleges the Project HRA omits adjacent projects and regional cumulative truck impacts to I-215, and suggests that the analysis should be extended by 1 kilometer from the Project site. Recirculated Section 4.2, Air Quality, includes a discussion of cumulative air quality impacts, including along truck routes. Please also see Response RI-254.128, above for further discussion about cumulative projects and cumulative impacts. The comment provides no basis for extending the zone of analysis by 1 kilometer. Please see cumulative analysis in the Project AQIA and HRA. It should be noted that a 1,000-foot zone of influence is commonly used for evaluating cumulative impacts, as pollutant concentrations drop significantly beyond this distance. While SCAQMD does not provide specific guidance for evaluating cumulative health risk impacts beyond the use of the incremental cancer risk threshold of 10 in one million on an individual project basis, BAAQMD utilizes a 1,000-foot zone of influence approach for evaluating cumulative health risk impacts[10]. Therefore, there is an established basis for using a 1,000-foot radius and the Project HRA properly concludes that Project emissions would not result in a significant cumulative health impact.

COMMENT 254.133

The U.S. EPA lowered the annual PM2.5 national ambient air quality standard from 12.0 to 9.0 g/m3 on February 7, 202418. Please update all tables (4.2-1) to reflect the lower standard. Riverside County is one of only 20 counties that will need to take additional emissions reductions actions to meet the new NAAQS and needs the highest emissions reductions of any county in the entire country to meet the new standards (Table ES-9 – US EPA – Final Regulatory Impact Analysis for the Reconsideration of the NAAQS for PM, 2024). This project will delay attainment of the new lower NAAQS.

RESPONSE 254.133

The EPA reduced the national ambient air quality standard (NAAQS) for fine particulate matter (PM2.5) from a level of 12 micrograms per cubic meter (μg/m^3) to 9 micrograms μg/m^3 on February 7, 2024 and footnote d in Table 4.2-3 of the Final EIR was revised to reflect this change.11 As explained in the EIR (Table 4.2-2), the South Coast Air Basin was out of attainment for PM2.5 prior to this change, as was Riverside County.12 Therefore the reduced NAAQS does not change any of the conclusions in the EIR. SCAQMD has not published revised ambient air quality standards for PM2.5, which are currently 10.4 μg/m^3 for construction and 2.5 μg/m^3 for

[10] https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/appendix-a-thresholds-of-significance-justification_final-pdf.pdf?rev=d35960ec035546629124ae2a25fb1df9&sc_lang=en

[11] https://www.epa.gov/newsreleases/epa-finalizes-stronger-standards-harmful-soot-pollution-significantly-increasing

[12] https://www.epa.gov/system/files/documents/2024-02/table_annual-pm25-county-design-values-2020-2022-for-web.pdf

operation).13 SCAQMD has also not revised its criteria pollutant threshold of significance for PM2.5.14

The EIR relies upon the thresholds of significance promulgated by SCAQMD, the expert regulatory air agency in the region, which are supported by substantial evidence. The analysis in Recirculated Section 4.2, Air Quality, shows that mitigated peak day localized construction emissions of PM2.5 are 0.39 µg/m^3, which is well below the SCAQMD Localized Significance Threshold (LST) of 10.4 µg/m^3. It also shows that the maximum daily construction emissions of PM2.5 is 30.91 lbs/day, which is well below the SCAQMD threshold of 55 lbs/day. For operations, Recirculated Section 4.2, Air Quality, shows that the mitigated peak day localized operational emissions of PM2.5 are 0.63 µg/m^3, which is well below the SCAQMD LST of 2.5 µg/m^3. However, the mitigated maximum daily operational emissions is 152.42 lbs/day, which is well above the SCAQMD threshold of 55 lbs/day. As such, Recirculated Section 4.2, Air Quality, concluded that construction air quality impacts were less than significant with mitigation, and operational air quality impacts were significant and unavoidable. These impact conclusions would not change based on the EPA's recent action. SCAQMD will develop a plan to achieve compliance with the revised NAAQS and will determine what measures are necessary to implement. Any SCAQMD measures that apply to the Project will be implemented pursuant to regulatory requirements.

COMMENT 254.153

The REIR incorrectly identifies the project boundaries and omits the construction phase emissions adjacent to the Grove Community Preschool and the Orange Terrace Park after-school day care. Both schools and daycares are within a few hundred feet of construction boundaries which will emit hazardous diesel PM, aldehydes, and naphthalene from construction equipment. Additionally, the asphalt used in the road repaving will give off toxic hydrogen sulfide gas, Polycyclic Aromatic Hydrocarbons (PAHs) and other carcinogens.

RESPONSE 254.153

As shown in revised Exhibit 2-A of the Project HRA, the analysis placed construction sources within 80 feet of the Grove Preschool (represented by Receptor R8), and the modeling conservatively assumed that construction would occur at these locations for the entire 4.35-year duration of Project construction, although construction on the southern Barton extension adjacent to the preschool would take place over a significantly shorter period of time. Regarding emissions of diesel particulate matter, aldehydes, and naphthalene, standard practice is to model diesel exhaust emissions as diesel particulate matter, as these and other toxic air contaminants typically adhere to particulates in diesel exhaust[15]. While the asphalt used in road paving may result in emissions of toxic air contaminants, these emissions would be extremely limited, lasting only for a matter of days while asphalt is being applied. Because exposure duration is a significant factor

[13] http://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf?sfvrsn=25

[14] http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook

[15] https://enviroatlas.epa.gov/enviroatlas/DataFactSheets/pdf/Supplemental/DieselPMairtoxics.pdf

in cancer risk, brief exposures to emissions that may occur during paving activities would result in minimal risk. For these reasons, toxic air contaminant emissions from paving activities are typically not considered in health risk assessments, as this risk is minimal compared to diesel particulate emissions generated by construction equipment.

J SHEARER LETTER RI-259

COMMENT RI-259.89

The health-risk assessment in revised appendix C-2 and summarized in the recirculated draft EIR applies arbitrary and incorrect methods for estimating the cumulative cancer risk. The updated document omits exhaust emissions from light-duty passenger vehicles from the health-risk assessment, inaccurately allocates construction emissions from outside the Specific Plan area, even though these emissions are closed to residential homes and sensitive receptors, applies a '1,000 foot evaluation distance' for traffic related emissions impacts which is invalid for a modeling project of this scope under CEQA, and still does not model the right number of warehouse buildings or trucks for the project, despite comments on the draft EIR about these issues.

RESPONSE RI-259.89

See Responses RA-6.3 and 254.129 above.

COMMENT RI-259.92

The business park and mixed-use components of the project are modeled as 'Office Park' in CalEEMod. Office Park is defined as a 'office buildings and support services, such as banks, restaurants, and service stations.' This is not consistent with the industrial land use of Business Park and Mixed Use (warehouse enterprise) described in the March JPA general plan.

RESPONSE RI-259.92

See Response RI-254.109, above.

A SILVA LETTER RI-267.5

COMMENT RI-267.5

The EPA recently tightened the standard for PM 2.5, though the region was almost in attainment for the previous standard. PM 2.5 is formed through chemical reaction and is also directly emitted from tire and brake wear, also from heavy trucks. Adding truck traffic makes attainment of the new standard even more impossible.

RESPONSE RI-267.5

See Response RI-254.133 above.