Northern Gateway Logistics Center Project

Final Environmental Impact Report

SCH No. 2021110379

Prepared for:

City of Menifee
29844 Haun Road
Menifee, CA 92586
(951) 769-8520

Prepared by:

Kimley-Horn and Associates, Inc.
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3801 University Avenue, Suite 300
Riverside, CA 92501

May 2025

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Section 1.0 Introduction

1.1 INTRODUCTION

The City of Menifee (City) has prepared this Final Environmental Impact Report (FEIR) in compliance with the California Environmental Quality Act (CEQA) for the Northern Gateway Logistics Center project (Project). The City is required, after completion of a Draft Environmental Impact Report (Draft EIR) (State Clearinghouse No. 2021110379), to consult with and obtain comments from public agencies having jurisdiction by law with respect to the Project and provide the general public with an opportunity to comment on the DEIR. This FEIR has been prepared to respond to comments received on the DEIR, which was circulated for public review from June 6, 2024, through July 22, 2024. The preceding Table of Contents provides a list of all persons, organizations, and public agencies who commented on the DEIR.

The City will evaluate comments on environmental issues from persons who reviewed the DEIR and will prepare a written response, pursuant to CEQA Guidelines §15088(a). The written response must address any significant environmental issues raised. In addition, there must be a good faith and reasoned analysis in the written response. However, lead agencies need only respond to significant environmental issues associated with the Project and do not need to provide all the information requested by commenters, as long as a good faith effort at full disclosure is made in the EIR (State CEQA Guidelines §15204, §15088). Those comments are responded to in **Section 2.0, Comments on the Draft EIR and Responses to Comments**.

State CEQA Guidelines §15088 recommends that where a response to comment makes important changes in the information contain in the text of the DEIR, that the Lead Agency either revise the text of the DEIR or include marginal notes showing that information. Added or modified text is shown in **Section 3.0, Errata**, by underlining (<u>example</u>) while deleted text is shown by striking (~~example~~). The additional information, corrections, and clarifications are not considered to substantively affect the conclusions within the EIR and therefore the City has determined that recirculation of the DEIR is not required as none of the criteria for recirculation under CEQA Guidelines Section 15088.5 have been met.

CEQA Guidelines §15132 indicates that the contents of a FEIR shall consist of:

a) Environmental Impact Reports shall contain the information outlined in this article, but the format of the document may be varied. Each element must be covered, and when these elements are not separated into distinct sections, the document shall state where in the document each element is discussed.

b) The EIR may be prepared as a separate document, as part of a general plan, or as part of a project report. If prepared as a part of the project report, it must still contain one separate and distinguishable section providing either analysis of all the subjects required in an EIR or, as a minimum, a table showing where each of the subjects is discussed. When the Lead Agency is a state agency, the EIR shall be included as part of the regular project report if such a report is used in the agency's existing review and budgetary process.

c) Draft EIRs shall contain the information required by Sections 15122 through 15131. Final EIRs shall contain the same information and the subjects described in Section 15132.

d) No document prepared pursuant to this article that is available for public examination shall include a "trade secret" as defined in Section 6254.7 of the Government Code, information about the location of archaeological sites and sacred lands, or any other information that is subject to the disclosure restrictions of Section 6254 of the Government Code.

Pursuant to CEQA Guidelines §15088(b), the City will provide written responses to comments to any public agency that commented on the DEIR, at least ten (10) days prior to the Planning Commission's consideration of certifying the EIR as adequate under CEQA. Written responses to comments will also be provided to non-public agency individuals, organizations, and entities that commented on the DEIR. In addition, the FEIR will be made available to the general public at the City's Planning Division office and on the City's website a minimum of 10 days prior to the Planning Commission public hearing.

The FEIR, along with other relevant information and public testimony at the Planning Commission hearing, will be considered by the City's Planning Commission.

1.2 ORGANIZATION OF EIR

This Final EIR provides the requisite information required under CEQA and is organized as follows:

- **Section 1.0 Introduction.** This section provides an introduction to the Final EIR, including the requirements under CEQA, the organization of the document, and a brief summary of the CEQA process activities to date.
- **Section 2.0 Comments and Responses.** This section provides a list of public agencies, organizations, and individuals commenting on the Draft EIR, provides a copy of each written comment received, and any response required under CEQA.
- **Section 3.0 Errata to the Draft EIR.** This section presents clarifications, amplifications, and insignificant modifications to the EIR, identifying revisions to the text of the document.

1.3 CEQA PROCESS SUMMARY

The Draft Environmental Impact Report (Draft EIR) is an informational document intended to inform the public and decision-makers about the environmental consequences of the Project. The Project involves the development of two new concrete tilt up warehouse and distribution buildings with associated office space on 20.17 acres of land. Building 1 is proposed to be 105,537 square feet (sq. ft.) consisting of 6,000 sq. ft. of office space and 99,537 sq. ft. of warehouse space and is located on the north side of the site. Building 2 is on the southern end of the site and is proposed to be 292,715 sq. ft. consisting of 8,000 sq. ft of office space, 7,000 sq. ft. of mezzanine, and 277,715 sq. ft. of warehouse area. Buildings 1 and 2 combined would consist of 398,252 sq. ft. of total building area. Associated facilities and improvements of the Project site includes loading dock doors (15 for Building 1; 37 for Building 2), on site landscaping, and related on-site and off-site improvements (including relocation of an underground flood channel). The proposed warehouse uses are considered speculative in nature, but may be used for receiving,

storing, and distribution of manufactured goods, pursuant to the City of Menifee Development Code (Menifee Development Code)'s definition for Warehousing, logistics, and distribution facilities. The proposed buildings would not include cold storage.

Additionally, SB 330, which provides that the City shall not "chang[e] the general plan land use designation, specific plan land use designation, or zoning…to a less intensive use… below what was allowed under the land use designation and zoning ordinances in effect on January 1, 2018". However, the Act includes an exception, and general plan and zoning designation changes to a "less intensive use" are permitted so long as the City concurrently changes the development standards, policies, and conditions applicable to other parcels within the jurisdiction, such that there is no net loss in residential capacity. (Govt. Code §66300(i).)

Pursuant to CEQA Guidelines § 15082, the City circulated a Notice of Preparation (NOP) advising public agencies, special districts, and members of the public who had requested such notice that an EIR for the proposed Project was being prepared. The initial NOP was distributed on XXX to solicit comments related to the proposed Project.

After receiving public comments on the NOP, the proposed Project was analyzed for its potential to result in environmental impacts. Impacts were evaluated in accordance with the significance criteria developed by the City that are based on criteria presented in Appendix G, "Environmental Checklist Form," of the CEQA Guidelines. The criteria in the Environmental Checklist (checklist), was used to determine if the proposed Project would result in, "no impact," "less than significant impact," "less than significant impact with mitigation measures," or potentially significant impact" to a particular environmental resource. In some instances, a project may use the checklist to provide an initial discussion of a project and to screen out certain topics from a full discussion in the Draft EIR.

The Draft EIR describes the existing environmental resources on the Project site and in the vicinity of the Project site, analyzes potential impacts on those resources that would or could occur upon initiation of the proposed Project, and identifies mitigation measures that could avoid or reduce the magnitude of those impacts determined to be significant. The environmental impacts evaluated in the Draft EIR concern several subject areas, including aesthetics/light and glare, air quality, biological resources, cultural and tribal resources, energy/energy conservation, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, public services, recreation, transportation, utilities and service systems, and wildfire. As noted in the preceding paragraph, public comment was received during the NOP process and included written letters provided to the City during public meetings. A copy of the letters with the NOP and a copy of the letters with the revised NOP is provided in Appendix A to the Draft EIR. The comments were used, as intended, to help inform the discussion of the Draft EIR and help determine the scope and framework of certain topical discussions.

When the Draft EIR was completed, it was circulated for public review pursuant to CEQA Guidelines § 15087. The 45-day public review for the Draft Environmental Impact Report began on June 21, 2023 and ended on July 20, 2023. All comment letters received during the 45-day public review period previously

mentioned are included in this Final EIR. Additionally, a public meeting with was held for the proposed Project on June 27, 2023 at 5:30 p.m.

As set forth in more detail in the Responses to Comments and Errata, none of the clarifications or amplifications set forth herein change the significance conclusions presented in the Draft EIR or substantially alters the analysis presented for public review. Furthermore, the Draft EIR circulated for public review was fully adequate under CEQA such that meaningful public review was not precluded. Thus, the clarifications provided in the Responses to Comments and Errata do not constitute significant new information that might trigger recirculation.

1.4 CHANGES TO THE DRAFT EIR

As stated previously, **Section 3.0, Errata to the Draft EIR** details the changes to the DEIR. In response to public comments, text changes have been made to DEIR sections to clarify and amplify the analysis or mitigation measures, and to make insignificant modifications to the DEIR. This information does not rise to the level of significant new information as the resulting impact analysis and alternatives considered remain essentially unchanged, and no new or more severe impacts have been identified. These changes do not warrant DEIR recirculation pursuant to California Public Resources Code §21092.1 and CEQA Guidelines §15088.5. As discussed herein and as elaborated upon in the respective Response to Comments, none of the clarifications or changes made in the Errata reflect a new significant environmental impact, a "substantial increase" in the severity of an environmental impact for which mitigation is not proposed, or a new feasible alternative or mitigation measure that would clearly lessen significant environmental impacts but is not adopted, nor do the Errata reflect a "fundamentally flawed" or "conclusory" DEIR. In all cases, as discussed in individual responses to comments and DEIR Errata, these minor clarifications and modifications do not identify new or substantially more severe environmental impacts that the City has not committed to mitigate. Therefore, the public has not been deprived of a meaningful opportunity to comment upon a substantial adverse environmental effect of the Project or an unadopted feasible Project alternative or mitigation measure. Instead, the information added supports the existing analysis and conclusions, and responds to inquiries made from commenters. Therefore, this FEIR is not subject to recirculation prior to certification.

CEQA Guidelines §15088.5 describes when an EIR requires recirculation prior to certification, stating in part:

> "(a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term "information" can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. *"Significant new information" requiring recirculation include, for example, a disclosure showing that:*

(1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.

(2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.

(3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to apply it.

(4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded (Mountain Lion Coalition v. Fish and Game Com. (1989) 214 Cal.App.3d 1043).

(b) Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR."

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Section 2.0 Comments and Responses to Draft EIR

2.1 INTRODUCTION TO COMMENTS AND RESPONSES

Table 2.0-1 below provides a list of those parties that provided written comments on the Draft EIR during the public review period. In addition, one comment letter was received after the close of the public review period. Each comment document has been assigned a letter as indicated in the table.

A copy of the written comments are provided in this section and have been annotated with the assigned letter along with a number for each comment. Each comment document is followed by a written response that corresponds to the comments provided.

Table 2.0-1: Comments from Public Agencies, Organizations and Individuals

Letter	Date Received	Organization/Name
Agencies		
A1	June 20, 2024	South Coast Air Quality Management District *Evelyn Aguilar, Air Quality Specialist, CEQA-IGR*
A2	July 10, 2024	Riverside County Flood Control and Water Conservation District *Amy McNeill, Engineering Project Manager*
A3	July 18, 2024	Riverside County Department of Waste Resources *Katherine Avila, Assistant Planner*
A4	July 18, 2024	South Coast Air Quality Management District *Sam Wang, Program Supervisor, CEQA IGR*
A5	July 22, 2024	City of Perris *Patricia Brenes, Planning Manager*
Organizations		
O1	June 18, 2024	Radical Research, LLC *Mike McCarthy, Ph.D.*
O2	July 1, 2024	Supporters Alliance for Environmental Responsibility (SAFER), c/o Lozeau Drury, LLP *Kylah Staley*
O3	July 17, 2024	Golden State Environmental Justice Alliance, c/o Blum, Collins & Ho LLP *Gary Ho*
Tribal		
T1	July 23, 2024	Agua Caliente Band of Cahuilla Indians *Luz Salazar, Cultural Resources Analyst*
Public/Individuals		
P1	June 25, 2024	*Breanna Harwood*
P2	July 16, 2024	*Jose Marquez*

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Comment Letter A1 - South Coast Air Quality Management District

Evelyn Aguilar, Air Quality Specialist, CEQA-IGR

Comment Letter - A1

From: Brandon Cleary
To: Cano, Kari; Perez, Aldo
Subject: Fwd: Technical Data Request: Proposed Northern Gateway Logistics Center Project
Date: Thursday, June 20, 2024 3:14:18 PM
Attachments: image001.jpg

Good afternoon Kari,

Please see below email from Aqmd. Would you be able to provide this info so I can send it back to them when I return next week?

Thanks!

Brandon Cleary

Sent via the Samsung Galaxy S24+, an AT&T 5G smartphone
Get Outlook for Android

From: Evelyn Aguilar <eaguilar@aqmd.gov>
Sent: Thursday, June 20, 2024 8:29:49 AM
To: Brandon Cleary <bcleary@cityofmenifee.us>
Cc: Sam Wang <swang1@aqmd.gov>
Subject: Technical Data Request: Proposed Northern Gateway Logistics Center Project

You don't often get email from eaguilar@aqmd.gov. Learn why this is important

[CAUTION]: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Brandon Cleary,

South Coast AQMD staff received the Notice of Availability of a Draft Environmental Impact Report (NOA/DEIR) for the **Proposed Northern Gateway Logistics Center Project** (South Coast AQMD Control Number: RVC240612-05). Staff is currently in the process of reviewing the NOA/DEIR. The public commenting period is from 6/6/2024 – 7/22/2024. 1

Upon review of the files provided as part of the public review period, I was able to access the Draft EIR and Appendices on the City's website.

Please provide an electronic copy of any live modeling and emission calculation files (complete data files, not summaries) that were used to quantify the air quality impacts from construction and/or operation of the Proposed Project as applicable, including the following: 2

- CalEEMod Input Files (.csv files);
- Live EMFAC output files;
- Any emission calculation file(s) (live version of excel file(s); no PDF) used to calculate the Project's emission sources (i.e. truck operations);

AERMOD Input and Output files, including AERMOD View file(s) (.isc);
- HARP Input and Output files and/or cancer risk calculation files (live version of excel file(s); no PDF) used to calculate cancer risk, and chronic and acute hazards from the Project;
- Any other files related to post-processing done outside of AERMOD to calculate pollutant-specific concentrations (if applicable).

You may send the above-mentioned files via a Dropbox link in which they may be accessed and downloaded by South Coast AQMD staff by 6/28/24. Without all files and supporting documentation, South Coast AQMD staff will be unable to complete a review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.

If you have any questions regarding this request, please feel free to contact me.

cont'd
2

Thank you,

Evelyn Aguilar
Air Quality Specialist, CEQA-IGR
Planning, Rule Development & Implementation
South Coast Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765
Phone: 909-396-3148
E-mail: eaguilar@aqmd.gov
Hours of operation:
Tuesday - Friday 7:00 AM to 5:30 PM

Cleaning the air that we breathe……™

Responses to Comment Letter A1 - South Coast Air Quality Management District
Evelyn Aguilar, Air Quality Specialist, CEQA-IGR

A1-1 This comment includes introductory statements and therefore, no further response is warranted.

A1-2 This comment includes a public records request for all technical documents related to air quality, health risk, and GHG analyses, electronic versions of all emission calculation files, and air quality modeling and health risk assessment files. As requested by the Commenter, the City sent the requested data files on March 26, 2024

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Comment Letter A2 - Riverside County Flood Control and Water Conservation District

Amy McNeill, Engineering Project Manager

Comment Letter - A2

JASON E. UHLEY
General Manager-Chief Engineer

1995 MARKET STREET
RIVERSIDE, CA 92501
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RIVERSIDE COUNTY FLOOD CONTROL
AND WATER CONSERVATION DISTRICT

256988

July 10, 2024

City of Menifee
Planning Division
29714 Haun Road, Building A
Menifee, CA 92586

Attention: Brandon Cleary

Re: Northern Gateway Logistics Center,
PLN 23-0040 - DEIR (State Clearinghouse No. 2021110379), APNs 331-060-007, 331-060-008, 331-060-020, 331-060-023 and 331-060-030

The Riverside County Flood Control and Water Conservation District (District) does not normally recommend conditions for land divisions or other land use cases in incorporated cities. The District also does not plan check City land use cases or provide State Division of Real Estate letters or other flood hazard reports for such cases. District comments/recommendations for such cases are normally limited to items of specific interest to the District including District Master Drainage Plan facilities, other regional flood control and drainage facilities which could be considered a logical component or extension of a master plan system, and District Area Drainage Plan fees (development mitigation fees). In addition, information of a general nature is provided. 1

The District's review is based on the above-referenced project transmittal, received June 6, 2024. The District **has not** reviewed the proposed project in detail, and the following comments do not in any way constitute or imply District approval or endorsement of the proposed project with respect to flood hazard, public health and safety, or any other such issue:

☐ This project would not be impacted by District Master Drainage Plan facilities, nor are other facilities of regional interest proposed.

☐ This project involves District proposed Master Drainage Plan facilities, namely, _____. The District will accept ownership of such facilities on written request by the City. The Project Applicant shall enter into a cooperative agreement establishing the terms and conditions of inspection, operation, and maintenance with the District and any other maintenance partners. Facilities must be constructed to District standards, and District plan check and inspection will be required for District acceptance. Plan check, inspection, and administrative fees will be required. All regulatory permits (and all documents pertaining thereto, e.g., Habitat Mitigation and Monitoring Plans, Conservation Plans/Easements) that are to be secured by the Applicant for both facility construction and maintenance shall be submitted to the District for review. The regulatory permits' terms and conditions shall be approved by the District prior to improvement plan approval, map recordation, or finalization of the regulatory permits. There shall be no unreasonable constraint upon the District's ability to operate and maintain the flood control facility(ies) to protect public health and safety.

☐ This project proposes channels, storm drains larger than 36 inches in diameter, or other facilities that could be considered regional in nature and/or a logical extension a District's facility, the District would consider accepting ownership of such facilities on written request by the City. The Project Applicant shall enter into a cooperative agreement establishing the terms and conditions of inspection, operation, and maintenance with the District and any other maintenance partners. Facilities must be constructed to District standards, and District plan check and inspection will be required for District acceptance. Plan check, inspection, and administrative fees will be required. The regulatory permits' terms and conditions shall be approved by the

District prior to improvement plan approval, map recordation, or finalization of the regulatory permits. There shall be no unreasonable constraint upon the District's ability to operate and maintain the flood control facility(ies) to protect public health and safety.

☒ This project is located within the limits of the District's Homeland/Romoland Line A Area Drainage Plan for which drainage fees have been adopted; applicable fees should be paid by cashier's check or money order only to the Flood Control District or City prior to issuance of grading permits. Fees to be paid should be at the rate in effect at the time of issuance of the actual permit. 2

☒ An encroachment permit shall be obtained for any construction related activities occurring within District right of way or facilities, namely, Romoland Master Drainage Plan Line A and Romoland Master Drainage Plan Line A-8. As such, the District should be identified as a Responsible Agency and this portion of the project should be included in the project description. If a proposed storm drain connection exceeds the hydraulic performance of the existing drainage facilities, mitigation will be required. For further information, contact the District's Encroachment Permit Section at 951.955.1266. 3

☒ The District's previous comments dated July 17, 2023 are still valid. 4

GENERAL INFORMATION

This project may require a National Pollutant Discharge Elimination System (NPDES) permit from the State Water Resources Control Board. Clearance for grading, recordation, or other final approval should not be given until the City has determined that the project has been granted a permit or is shown to be exempt. 5

If this project involves a Federal Emergency Management Agency (FEMA) mapped floodplain, then the City should require the applicant to provide all studies, calculations, plans, and other information required to meet FEMA requirements, and should further require that the applicant obtain a Conditional Letter of Map Revision (CLOMR) prior to grading, recordation, or other final approval of the project and a Letter of Map Revision (LOMR) prior to occupancy. 6

The project proponent shall bear the responsibility for complying with all applicable mitigation measures defined in the California Environmental Quality Act (CEQA) document (i.e., Negative Declaration, Mitigated Negative Declaration, Environmental Impact Report) and/or Mitigation Monitoring and Reporting Program, if a CEQA document was prepared for the project. The project proponent shall also bear the responsibility for complying with all other federal, state, and local environmental rules and regulations that may apply. 7

If a natural watercourse or mapped floodplain is impacted by this project, the City should require the applicant to obtain a Section 1602 Agreement from the California Department of Fish and Wildlife and a Clean Water Act Section 404 Permit from the U.S. Army Corps of Engineers, or written correspondence from these agencies indicating the project is exempt from these requirements. A Clean Water Act Section 401 Water Quality Certification may be required from the local California Regional Water Quality Control Board prior to issuance of the Corps 404 permit. 8

Very truly yours,

Amy McNeill

AMY MCNEILL
Engineering Project Manager

Attachments

EM:blj

JASON E. UHLEY
General Manager-Chief Engineer

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RIVERSIDE COUNTY FLOOD CONTROL
AND WATER CONSERVATION DISTRICT

251877

July 17, 2023

City of Menifee
Planning Division
29714 Haun Road, Building A
Menifee, CA 92586

Attention: Mr. Brandon Cleary

Re: PLN 23-0040, Northern Gateway Logistics Center Project, APNs 331-060-007, 331-060-008, 331-060-020, 331-060-023 and 331-060-030

The Riverside County Flood Control and Water Conservation District (District) does not normally recommend conditions for land divisions or other land use cases in incorporated cities. The District also does not plan check City land use cases or provide State Division of Real Estate letters or other flood hazard reports for such cases. District comments/recommendations for such cases are normally limited to items of specific interest to the District including District Master Drainage Plan facilities, other regional flood control and drainage facilities which could be considered a logical component or extension of a master plan system, and District Area Drainage Plan fees (development mitigation fees). In addition, information of a general nature is provided.

The District's review is based on the above-referenced project transmittal, received June 21, 2023. The District **has not** reviewed the proposed project in detail, and the following comments do not in any way constitute or imply District approval or endorsement of the proposed project with respect to flood hazard, public health and safety, or any other such issue:

☐ This project would not be impacted by District Master Drainage Plan facilities, nor are other facilities of regional interest proposed.

☐ This project involves District proposed Master Drainage Plan facilities, namely, _____. The District will accept ownership of such facilities on written request of the City. Facilities must be constructed to District standards, and District plan check and inspection will be required for District acceptance. Plan check, inspection, and administrative fees will be required.

☐ This project proposes channels, storm drains 36 inches or larger in diameter, or other facilities that could be considered regional in nature and/or a logical extension of the adopted Romoland Master Drainage Plan. The District would consider accepting ownership of such facilities on written request of the City. Facilities must be constructed to District standards, and District plan check and inspection will be required for District acceptance. Plan check, inspection, and administrative fees will be required.

☒ This project is located within the limits of the District's Homeland/Romoland Line A Area Drainage Plan for which drainage fees have been adopted; applicable fees should be paid by cashier's check or money order only to the Flood Control District or City prior to issuance of grading permits. Fees to be paid should be at the rate in effect at the time of issuance of the actual permit.

9

☒ An encroachment permit shall be obtained for any construction related activities occurring within District right of way or facilities, namely, Romoland Master Drainage Plan Line A and Romoland Master Drainage Plan Line A-8. If a proposed storm drain connection exceeds the hydraulic performance of the existing drainage facilities, mitigation will be required. For further information, contact the District's Encroachment Permit Section at 951.955.1266.

☐ The District's previous comments are still valid.

GENERAL INFORMATION

This project may require a National Pollutant Discharge Elimination System (NPDES) permit from the State Water Resources Control Board. Clearance for grading, recordation, or other final approval should not be given until the City has determined that the project has been granted a permit or is shown to be exempt.

If this project involves a Federal Emergency Management Agency (FEMA) mapped floodplain, then the City should require the applicant to provide all studies, calculations, plans, and other information required to meet FEMA requirements, and should further require that the applicant obtain a Conditional Letter of Map Revision (CLOMR) prior to grading, recordation, or other final approval of the project and a Letter of Map Revision (LOMR) prior to occupancy.

cont'd 9

The project proponent shall bear the responsibility for complying with all applicable mitigation measures defined in the California Environmental Quality Act (CEQA) document (i.e., Negative Declaration, Mitigated Negative Declaration, Environmental Impact Report) and/or Mitigation Monitoring and Reporting Program, if a CEQA document was prepared for the project. The project proponent shall also bear the responsibility for complying with all other federal, state, and local environmental rules and regulations that may apply.

If a natural watercourse or mapped floodplain is impacted by this project, the City should require the applicant to obtain a Section 1602 Agreement from the California Department of Fish and Wildlife and a Clean Water Act Section 404 Permit from the U.S. Army Corps of Engineers, or written correspondence from these agencies indicating the project is exempt from these requirements. A Clean Water Act Section 401 Water Quality Certification may be required from the local California Regional Water Quality Control Board prior to issuance of the Corps 404 permit.

Very truly yours,

Amy McNeill

AMY MCNEILL
Engineering Project Manager

ec: Riverside County Planning Department
Attn: Timothy Wheeler

EM:mm

Response to Comment Letter A2 - Riverside County Flood Control and Water Conservation District
Amy McNeill, Engineering Project Manager

A2-1 This comment includes introductory statements concerning the Riverside County Flood Control and Water Conservation District's (District) interest in projects associated with the District Master Drainage Plan facilities and other regional flood control and drainage facilities which could be considered a logical component or extension of a master plan system. Refer to Responses to Comments A2-2 through A2-4 below.

A2-2 It is noted that the Project Applicant will be required to obtain an encroachment permit for any construction-related activities occurring within District right-of-way or facilities, such as the Project's construction of the District's Homeland/Romoland Drainage Plan and the Project Applicant will be required to pay any applicable fees in accordance with the Rules and Regulations for Administration of Area Drainage Plan as a condition of approval. The Area Drainage Plan (ADP) fees will be paid to the District at the time of issuance of grading permits.

A2-3 It is noted that the Project Applicant will be required to obtain an encroachment permit for any construction-related activities occurring within District right-of-way or facilities, namely Romoland Master Drainage Plan Line A and Romoland Master Drainage Plan Line A-8. Further, the Draft EIR evaluates the Project's potential impacts on drainage facilities and, at page 4.9-23, concludes that all proposed drainage improvements would adequately convey flows to the basin and provide flood protection for the 100-year storm event. Additionally, the Project Applicant would be required to obtain coverage under the National Pollutant Discharge Elimination System (NPDES) Construction Stormwater Permit, and comply with the water quality policies of the City of Menifee General Plan (Menifee GP) and the Riverside County Drainage Area Management Plan (DAMP), which require implementation of construction Best Management Practices (BMPs) per a stormwater pollution prevention plan (SWPPP; see **MM HYD-1**) and post-construction BMPs in accordance with the Water Quality Control Plan for the Santa Ana River Basin. In addition, the Santa Ana Municipal Separate Storm Sewer Systems (MS4) Permit requires the preparation of a project-specific water quality management plan (WQMP) for all development projects. Pursuant to Santa Ana MS4 Permit, a project-specific WQMP was prepared and is included as Appendix I1 to the Draft EIR and has incorporated combined low-impact development (LID) treatment, hydrologic control BMPs, and sediment supply BMPs. A final WQMP will be required to address BMP sizing and O&M plan pursuant to Draft EIR **MM HYD-2** and comply with City of Menifee Municipal Code (Menifee MC) Section 15.01, Storm Water/Urban Runoff which includes the requirement for the preparation and implementation of a Project-Specific WQMP and has outlined all BMPs designed to meet water quality standards and mitigate any adverse impacts. Refer to Draft EIR pages 4.9-15 through 4.9-19 for further discussion.

A2-4 The Commenter's attachment letter dated July 17, 2023 and submitted during the Project's Notice of Preparation has been noted. No further response is warranted.

A2-5 Relevant to the Project, the NPDES permit is divided into two parts: construction and post-construction. The construction permitting is administered by the State Water Resources Control Board (SWRCB), while the post-construction permitting is administered by the Regional Water Quality Control Board (RWQCB). Development projects typically result in the disturbance of soil that requires compliance with the NPDES General Permit, Waste Discharge Requirements for Discharges of Stormwater Runoff Associated with Construction Activities (Order No. 2012-0006-DWQ, NPDES Number CAS000002) General Construction Permit. This Statewide General Construction Permit regulates discharges from construction sites that disturb one or more acres of soil. As stated in Response to Comment A2-3 above, the Project would comply with the NPDES permit with the implementation of construction and post-construction BMPs in the SWPPP and Project-specific WQMP. Therefore, the Project would be compliant with the NPDES permitting requirements (see Draft EIR **MMs HYD-1** and **HYD-2**).

A2-6 As discussed in Draft EIR Section 4.9: Hydrology and Water Quality page 4.9-5, review of Federal Emergency Management Agency (FEMA)'s Flood Insurance Rate Map (FIRM) shows the Project site being covered by one map panel: 06065C2055H (effective 8/18/2014). According to this FIRM, the westerly portion of the Project site is within Flood Zone X (shaded) under the Letter of Map Revision (LOMR) 21-09-0711P (effective 1/24/2022) and the easterly portion of the Project site is within Flood Zone X (unshaded). Flood Zone X (shaded) characterize areas of moderate flood hazard and is defined as areas of 0.2-percent annual chance (500-year) flood; areas of 1-percent annual chance (100-year) flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from 1-percent annual chance (100-year) flood. Flood Zone X (unshaded) is defined as areas of minimal flood hazard.

As discussed in Draft EIR Section 4.9: Hydrology and Water Quality page 4.9-23, BMPs have been incorporated into the site design to fully address all Drainage Management Areas (DMAs). As noted in Draft EIR Preliminary Water Calculations (**Appendix I2**), with implementation of the proposed BMP, runoff would be conveyed to the corresponding detention basins which have been designed appropriately to provide flood protection for the 100-year storm event. Implementation of efficient design measures and applicable BMPs pursuant to the Project's WQMP and SWPPP (**MMs HYD-1** and **HYD-2**,) would prevent flooding on- and off-site due to an increase in surface water runoff. Therefore, the Project will adequately control storm water drainage.

A2-7 The City of Menifee prepared a Draft EIR and this FEIR in accordance with CEQA. The Project applicant will implement mitigation measures proposed in the Draft EIR and comply with applicable federal, state, and local laws, ordinances, and regulations to reduce impacts associated with the Project.

A2-8 As discussed in Draft EIR Section 4.3: Biological Resources page 4.3-17, a Jurisdictional Delineation was conducted for the Drainage 1/Ethanac Wash located along the eastern portion of the Project site. Draft EIR Appendix C3 concluded that no riparian vegetation or wetland obligate plant species were observed within Drainage 1. Review of the United States Fish and Wildlife Service (USFWS) National Wetlands Inventory (NWI) and the United States Geological Survey (USGS) National Hydrography Dataset did not identify any riverine features within or adjacent to the

boundaries of the Project site. Further, Drainage 1 does not hold water for long enough to create anaerobic condition, ultimately forming hydric soils. Thus, Drainage 1 did not meet wetland requirements. Therefore, because regulatory approvals from the United States Army Corps of Engineers (USACE) would not be required since Drainage 1 was created wholly in the uplands and did not replace an existing blueline stream it does not qualify as waters of the United States.

However, the RWQCB and CDFW may assert jurisdiction over the storm drain channel which would require a Report of Waste Discharge and Streambed Alteration Agreement. Accordingly, the Project Applicant will obtain a Report of Waste Discharge and Streambed Alteration Agreement prior to Project implementation. Refer to Draft EIR 4.3-17 for further discussion.

A2-9 The Commenter's attachment letter dated July 17, 2023 and submitted during the Project's Notice of Preparation has been noted. No further response is warranted.

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Comment Letter A3 - Riverside County Department of Waste Resources

Katherine Avila, Assistant Planner

Comment Letter - A3

RIVERSIDE COUNTY DEPARTMENT OF WASTE RESOURCES

Andy Cortez, General Manager-Chief Engineer

SENT VIA EMAIL ONLY
bcleary@cityofmenifee.us

July 18, 2024

Brandon Cleary, Associate Planner
City of Menifee (City)
29844 Haun Road
Menifee, CA 92586

RE: Notice of Availability (NOA) of a Draft Environmental Impact Report (DEIR) for the Proposed "Northern Gateway Logistics Center Project"; Major Plot Plan No. PLN23-0040 – DEIR (State Clearinghouse No. 2021110379)

Dear Mr. Cleary:

The Riverside County Department of Waste Resources (RCDWR) has reviewed the NOA addressing a DEIR for the proposed Northern Gateway Logistics Center Project (Project). The Project includes various applications to allow for the development of two concrete tilt up warehouses. Building 1 is proposed to be 105,537 square feet (sq. ft.) consisting of 6,000 sq. ft. of office space and 99,537 sq. ft. of warehouse space. Building 2 is on the southern end of the site and is proposed to be 292,715 sq. ft. consisting of 8,000 sq. ft of office space. Associated facilities and improvements of the Project site includes loading dock doors, on-site landscaping, and related on-site and off-site improvements (including relocation of an underground storm drain). 1

The RCDWR would like to reiterate and/or provide the following comments for your consideration while preparing the Project's Final EIR: 2

1. The following information can be useful in the analysis of the solid waste impacts:

    a) The waste hauler may utilize the El Sobrante, Lamb Canyon, and/or the Badlands Landfill for disposal. Updated descriptions of the local landfills, inclusive of 2023 year-end landfill information, are provided below:

    <u>El Sobrante Landfill:</u>

    The El Sobrante Landfill is located east of Interstate 15 and Temescal Canyon Road to the south of the City of Corona and Cajalco Road at 10910 Dawson Canyon Road. The landfill is owned and operated by USA Waste of California, a subsidiary of Waste Management, Inc., and encompasses 1,322 acres, of which 645 acres are permitted for landfill operation. The El Sobrante Landfill has a total disposal capacity of approximately 209.9 million cubic yards and can receive up to 70,000 tons per week (tpw) of refuse. USA Waste must allot at least 28,000 tpw for County refuse. The 3

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landfill's permit allows a maximum of 16,054 tons per day (tpd) of waste to be accepted into the landfill, due to the limits on vehicle trips. If needed, 5,000 tpd must be reserved for County waste, leaving the maximum commitment of Non-County waste at 11,054 tpd. Per the 2023 Annual Report, the landfill had a remaining in-County disposal capacity of approximately 47.2 million tons. In 2023, the El Sobrante Landfill accepted a daily average of 10,341 tons with a period total of approximately 3,184,920 tons. The landfill is expected to reach capacity in approximately 2059.

cont;d 3

Lamb Canyon Landfill:

The Lamb Canyon Landfill is located between the City of Beaumont and City of San Jacinto at 16411 Lamb Canyon Road (State Route 79), south of Interstate 10 and north of Highway 74. The landfill is owned and operated by Riverside County. The landfill property encompasses approximately 1,189 acres, of which 703.4 acres encompass the current landfill permit area. Of the 703.4-acre landfill permit area, approximately 144.6 acres are permitted for waste disposal. The landfill is currently permitted to receive 5,000 tpd of MSW for disposal and 500 tpd for beneficial reuse. The site has an estimated total disposal capacity of approximately 21.1 million tons. As of January 1, 2024 (beginning of day), the landfill has a total remaining capacity of approximately 6.7 million tons. The current landfill remaining disposal capacity is estimated to last, at a minimum, until approximately 2032. From January 2023 to December 2023, the Lamb Canyon Landfill accepted a daily average of 2,049 tons with a period total of approximately 627,127 tons. Landfill expansion potential exists at the Lamb Canyon Landfill site.

4

Badlands Landfill:

The Badlands Landfill is located northeast of the City of Moreno Valley at 31125 Ironwood Avenue and accessed from State Highway 60 at Theodore Avenue. The landfill is owned and operated by Riverside County. The existing landfill encompasses 1,168.3 acres, with a total disturbance area of 278 acres, of which 150 acres are for refuse disposal. Landfill expansion potential exists at the Badlands Landfill site. Under the 2022 Solid Waste Facility Permit (SWFP), the permitted disturbance area increases from 278 acres to 811 acres, and the refuse disposal area increases from 150 acres to 409 (in multiple stages). The landfill is currently permitted to receive 5,000 tpd of MSW for disposal and 300 tpd for beneficial reuse. The site has an estimated total capacity of approximately 68.6 million tons. As of January 1, 2024 (beginning of day), the landfill had a total remaining disposal capacity of approximately 49.8 million tons. Under the 2022 SWFP, the landfill would have a remaining disposal capacity estimated to last, at a minimum, until approximately 2059. From January 2023 to December 2023, the Badlands Landfill accepted a daily average of 2,848 tons with a period total of approximately 874,450 tons.

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2. As indicated in previous correspondence (see attached), you may wish to consider incorporating the following measure to help reduce the Project's anticipated solid waste impacts and enhance efforts to comply with the State's mandate (AB 75) of 50% solid waste diversion from landfilling [1]:

6

[1] A.B. 75, Chapter 764, 1999-2000 Strom-Martin, (Cal. 1999).

- Demonstrate compliance with SB 1383 which establishes regulations to reduce organics waste disposal and went into effect on January 1, 2022.[2] This law establishes methane emissions reduction targets in a statewide effort to reduce emissions of short-lived climate pollutants caused by organics waste disposal.

cont;d 6

Thank you for including RCDWR in the review process. Please continue to include the RCDWR in future transmittals. Please email me at kaavila@rivco.org if you have any questions regarding the above comments.

7

Sincerely,

Katherine Avila
Assistant Planner

Cc: Kinika Hesterly, RCDWR

DM# 334823

[2] A.B 1383, Chapter 395, 2015-2016 Lara, (Cal. 2016).

RIVERSIDE COUNTY
DEPARTMENT OF
WASTE RESOURCES

Hans W. Kernkamp, General Manager-Chief Engineer

SENT VIA EMAIL ONLY
bcleary@cityofmenifee.us

July 6, 2023

Brandon Cleary, Associate Planner
City of Menifee (City)
29844 Haun Road
Menifee, CA 92586

RE: Notice of Preparation (NOP) and Public Scoping Meeting Notice for a Draft Environmental Impact Report (DEIR) for the Proposed "Northern Gateway Logistics Center Project"; Major Plot Plan (PP) No. PLN23-0040.

Dear Mr. Cleary:

The Riverside County Department of Waste Resources (RCDWR) has reviewed the NOP addressing a DEIR for the proposed Northern Gateway Logistics Center Project (Project). The Project includes various applications to allow for the development of two concrete tilt up warehouses. Building 1 is proposed to be 105,537 square feet (sq. ft.) consisting of 6,000 sq. ft. of office space and 99,537 sq. ft. of warehouse space. Building 2 is on the southern end of the site and is proposed to be 292,715 sq. ft. consisting of 8,000 sq. ft of office space. Associated facilities and improvements of the Project site includes loading dock, on-site landscaping, and related on-site and off-site improvements (including relocation of an underground storm drain). The RCDWR offers the following comments for your consideration while preparing the Project's EIR:

1. Construction of the Project may generate a substantial quantity of construction and demolition (C&D) waste. Should a large quantity of C&D waste, that is unable to be recycled, be brought to a County landfill for disposal, it could exceed the landfill's daily permitted capacity, thus a violation of state regulations.[1] To assess waste impacts, the DEIR should consider quantitatively analyzing this potential solid waste impact and discuss feasible mitigation programs/regulatory compliance.

   Note: CalRecycle's website may be helpful to determine the Project's waste generation: https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates

2. The following information can be useful in the analysis of the solid waste impacts:

   a) Solid waste generated within the Project area is collected by WMI, with the bulk of recyclable waste and green waste delivered to the Moreno Valley Solid Waste Recycling and Transfer Station (MVTS) for processing. The facility is located at 17700 Indian Street in Moreno Valley. It is permitted for a 2,500 tons per day (tpd) operation.

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[1] Title 40, Vol. 41 C.F.R § 243.203 *et seq.* (1976).

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b) The waste hauler may utilize the El Sobrante, Lamb Canyon, and/or the Badlands Landfill for disposal. Descriptions of the local landfills are provided below:

El Sobrante Landfill:

The El Sobrante Landfill is located east of Interstate 15 and Temescal Canyon Road to the south of the City of Corona and Cajalco Road at 10910 Dawson Canyon Road. The landfill is owned and operated by USA Waste of California, a subsidiary of Waste Management, Inc., and encompasses 1,322 acres, of which 645 acres are permitted for landfill operation. The El Sobrante Landfill has a total disposal capacity of approximately 209.9 million cubic yards and can receive up to 70,000 tons per week (tpw) of refuse. USA Waste must allot at least 28,000 tpw for County refuse. The landfill's permit allows a maximum of 16,054 tons per day (tpd) of waste to be accepted into the landfill, due to the limits on vehicle trips. If needed, 5,000 tpd must be reserved for County waste, leaving the maximum commitment of Non-County waste at 11,054 tpd. Per the 2021 Annual Report, the landfill had a remaining in-County disposal capacity of approximately 50.1 million tons. [2] In 2022, the El Sobrante Landfill accepted a daily average of 10,646 tons with a period total of approximately 3,278,846 tons. The landfill is expected to reach capacity in approximately 2057.

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Lamb Canyon Landfill:

The Lamb Canyon Landfill is located between the City of Beaumont and City of San Jacinto at 16411 Lamb Canyon Road (State Route 79), south of Interstate 10 and north of Highway 74. The landfill is owned and operated by Riverside County. The landfill property encompasses approximately 1,189 acres, of which 703.4 acres encompass the current landfill permit area. Of the 703.4-acre landfill permit area, approximately 144.6 acres are permitted for waste disposal. The landfill is currently permitted to receive 5,000 tpd of MSW for disposal and 500 tpd for beneficial reuse. The site has an estimated total disposal capacity of approximately 21.1 million tons.[3] As of January 1, 2023 (beginning of day), the landfill has a total remaining capacity of approximately 7.3 million tons.[4] The current landfill remaining disposal capacity is estimated to last, at a minimum, until approximately 2032.[5] From January 2022 to December 2022, the Lamb Canyon Landfill accepted a daily average of 1,969 tons with a period total of approximately 606,481 tons. Landfill expansion potential exists at the Lamb Canyon Landfill site.

Badlands Landfill:

The Badlands Landfill is located northeast of the City of Moreno Valley at 31125 Ironwood Avenue and accessed from State Highway 60 at Theodore Avenue. The landfill is owned and operated by Riverside County. The existing landfill encompasses 1,168.3 acres, with a total disturbance area of 278 acres, of which 150 acres are for refuse disposal. Landfill expansion potential exists at the Badlands Landfill site. Under the 2022 Solid Waste Facility Permit (SWFP), the permitted disturbance area increased from 278 acres to 811

[2] 2021 El Sobrante Landfill Annual Report- Based on 125,193,774 tons remaining capacity (40% for in-county waste).
[3] GASB 18_ 2022 – Engineering Estimate for total landfill capacity
[4] GASB 18_2022 & SiteInfo
[5] SWFP # 33-AA-0007

acres, and the refuse disposal area increased from 150 acres to 409 (in multiple stages). The landfill is currently permitted to receive 5,000 tpd of MSW for disposal and 300 tpd for beneficial reuse. The site has an estimated total capacity of approximately 82.3 million tons.[6] As of January 1, 2023 (beginning of day), the landfill had a total remaining disposal capacity of approximately 3.5 million tons.[7] Under the 2022 SWFP, the landfill would have a remaining disposal capacity estimated to last, at a minimum, until approximately 2059.[8] From January 2022 to December 2022, the Badlands Landfill accepted a daily average of 2,660 tons with a period total of approximately 819,166 tons.

3. Additionally, you may wish to consider incorporating the following measures to help reduce the Project's anticipated solid waste impacts and enhance efforts to comply with the State's mandate (AB 75) of 50% solid waste diversion from landfilling [9]:

   - The use of mulch and/or compost in the development and maintenance of landscaped areas within the project boundaries is recommended. Recycle green waste through either onsite composting of grass, i.e., leaving the grass clippings on the lawn, or sending separated green waste to a composting facility.

   - Consider xeriscaping and the use of drought tolerant low maintenance vegetation in all landscaped areas of the project.

   - Hazardous materials are not accepted at the Riverside County landfills. Any hazardous wastes, including paint, used during construction must be properly disposed of at a licensed facility in accordance with local, state and federal regulations. For further information regarding the determination, transport, and disposal of hazardous waste, please contact the Riverside County Department of Health, Environmental Protection and Oversight Division, at 1.888.722.4234.

   - AB 341 focuses on increased commercial waste recycling as a method to reduce greenhouse gas (GHG) emissions.[10] The regulation requires businesses and organizations that generate four or more cubic yards of waste per week and multifamily units of 5 or more, to recycle. A business shall take at least one of the following actions in order to reuse, recycle, compost, or otherwise divert commercial solid waste from disposal:
     - Source separate recyclable and/or compostable material from solid waste and donate or self-haul the material to recycling facilities.
     - Subscribe to a recycling service with waste hauler.
     - Provide recycling service to tenants (if commercial or multi-family complex).

cont;d
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[6] SWFP # 33-AA-0006
[7] GASB_18_2022 & SiteInfo
[8] SWFP # 33-AA-0006
[9] A.B. 75, Chapter 764, 1999-2000 Strom-Martin, (Cal. 1999).
[10] A.B. 341, Chapter 476, 2011-2012 Chesbro, (Cal. 2011).

- Demonstrate compliance with requirements of California Code of Regulations Title 14.

  For more information, please visit:

  http://www.rcwaste.org/business/recycling/mcr

- AB 1826 requires businesses and multifamily complexes to arrange for organic waste recycling services.[11] Those subject to AB 1826 shall take at least one of the following actions in order to divert organic waste from disposal:
  - Source separate organic material from all other recyclables and donate or self-haul to a permitted organic waste processing facility.
  - Enter into a contract or work agreement with gardening or landscaping service provider or refuse hauler to ensure the waste generated from those services meet the requirements of AB 1826.

- Demonstrate compliance with SB 1383 which establishes regulations to reduce organics waste disposal and went into effect on January 1, 2022.[12] This law establishes methane emissions reduction targets in a statewide effort to reduce emissions of short-lived climate pollutants caused by organics waste disposal.

cont;d
8

Thank you for including RCDWR in the review process. Please continue to include the RCDWR in future transmittals. Please email me at kaavila@rivco.org if you have any questions regarding the above comments.

Sincerely,

Katherine Avila
Urban/Regional Planner I

Cc: Kinika Hesterly, RCDWR

DM# 316313

[11] A.B. 1826, Chapter 727, 2013-2014 Chesbro, (Cal. 2014).
[12] A.B 1383, Chapter 395, 2015-2016 Lara, (Cal. 2016).

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Response to Comment Letter A3 - Riverside County Department of Waste Resources
Katherine Avila, Assistant Planner

A3-1 This comment includes introductory statements and a brief Project description. No further response is warranted.

A3-2 The City appreciates and values these comments during the FEIR participation process. Responses to comments are provided in Responses to Comments A3-3 through A3-6 below.

A3-3 Draft EIR Table 4.15-5: Landfill Information lists the El Sobrante Landfill's maximum permitted throughput (tons per day), remaining capacity in cubic yards, maximum permitted capacity in cubic yards, and ceased operation date. This information reflected available data at the time the Draft EIR was prepared. The Project's estimated 5,846 pounds (2.9 tons) of waste per day represented approximately 0.02 percent of El Sobrante's Landfill's maximum daily throughput. Therefore, the Project adequately included information regarding the El Sobrante Landfill in the Draft EIR per the commenter's suggestion.

A3-4 The Draft EIR anticipated that solid waste from the Project site would ultimately end up in either El Sobrante Landfill or Badlands Landfill. As concluded in Draft EIR Section 4.15 page 4.15-18, the Project's solid waste disposal needs could be accommodated at one or a combination of the disposal facilities. However, the availability for the Project to utilize the Lamb Canyon Landfill has been noted.

A3-5 Draft EIR Table 4.15-5: Landfill Information lists the Badlands Sanitary Landfill's maximum permitted throughput (tons per day), remaining capacity in cubic yards, maximum permitted capacity in cubic yards, and ceased operation date. This information reflected available data at the time the Draft EIR was prepared. The Project's estimated 5,846 pounds (2.9 tons) of waste per day represented approximately 0.06 percent of the Badlands Sanitary Landfill maximum daily throughput. Therefore, the Project adequately included information regarding the Badlands Sanitary Landfill in the Draft EIR per the commenter's suggestion.

A3-6 As discussed in Draft EIR Section 4.15, page 4.15-18 and 4.15-19, the Project's solid waste would be handled and disposed in compliance applicable federal, state, and local regulations which include, but not limited to, with California Green Building Standards Code § 5.408.1, the more stringent of the code sections, that requires a minimum of 65 percent diversion of solid waste; and Menifee MC Sections 6.40.010 and 6.40.050, requiring a 50 percent diversion of solid waste materials from landfills by using recycling, reuse, and diversion programs. Therefore, the Project would adhere to the solid waste goals and requirements of AB 75 and 1383.

A3-7 The City thanks the Commenter for their letter on the Project's Draft EIR. As requested, the City will include the Commenter on the Project's public interest list for all future Project noticing. No further response is warranted.

A3-8 The Commenter's letter on the Project's Notice of Preparation (NOP) has been noted. The Commenter's comments made on the NOP were taken into consideration during the preparation of the Draft EIR's environmental impact analysis pertaining to solid waste. Accordingly, refer to

Responses to Comments A3-3 through A3-6 above and Draft EIR Sections 4.8, Hazards and Hazardous Materials, and 4.15, Utilities and Service Systems for more information.

Comment Letter A4 - South Coast Air Quality Management District

Sam Wang, Program Supervisor, CEQA IGR

Comment Letter - A4

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:
bcleary@cityofmenifee.us
Brandon Clearly, Associate Planner
City of Menifee, Community Development Department
29844 Haun Road
Menifee, CA 92586

July 18, 2024

Draft Environmental Impact Report (EIR) for the Proposed Northern Gateway Logistics Center Project (Proposed Project) (SCH No. 2021110379)

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to review the above-mentioned document. The City of Menifee is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff (Staff) has provided a brief summary of the project information and prepared the following comments. 1

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

Based on the Draft EIR, the Proposed Project consists of construction and operation of two warehouse buildings (Building 1 and Building 2) totaling 398,252 square feet (sq ft) of total building area on approximately 20.17 acres of undeveloped land within the City of Menifee in Riverside County.[1] Building 1 will be developed as a 105,537 sq ft building and will include 99,537 sq ft of warehouse space and 15 truck loading docks.[2] Building 2 will be developed as a 292,715 sq ft building and will include 277,715 sq ft of warehouse space and 37 truck loading docks.[3] Both warehouse buildings combined will generate 184 truck trips per day (92 trucks inbound + 92 trucks outbound).[4] 2

The Proposed Project will not include cold storage facilities.[5] The air quality analysis contained in the Draft EIR, therefore, does not take into account emissions from transport refrigeration units (TRUs) and the analysis models the Proposed Project as unrefrigerated.[6] The nearest sensitive receptors, a residential development, are located approximately 350 feet south of the Proposed Project site and the nearest off-site worker is located approximately 688 feet northwest (Sergio Gonzalez Training Center).[7, 8] Construction is anticipated to occur in one phase, commence in the 4th quarter of 2024, and be completed by the 4th quarter of 2025 (lasting approximately 12 months).[9,10] The Proposed Project is located near the southeast intersection of Ethanac Rd and Evans Rd.[11] 3

South Coast AQMD Staff's Comments 4

[1] Draft EIR. 2.0. Project Description. Pages 2-1 through 2-3.
[2] *Ibid.* 2.0 Project Description. Page 2-3.
[3] *Ibid.* 2.0 Project Description. Page 2-3.
[4] *Ibid.* 4.13 Transportation. Page 4.13-11.
[5] *Ibid.* 2.0 Project Description. Page 2-3.
[6] *Ibid.* 4.2 Air Quality. Page 4.2-19.
[7] *Ibid.* 4.2 Air Quality. Page 4.2-16.
[8] *Ibid.* 4.2 Air Quality. Page 4.2-34.
[9] *Ibid.* 2.0 Project Description. Page 2-4.
[10] *Ibid.* Appendix B1. Air Quality Assessment. Page 20.
[11] *Ibid.* 2.0 Project Description, Exhibit 2-2 Local Vicinity Map. Page 2-7.

Potential Underestimation of Operational Emissions Due to Inaccurate Assumptions for Truck Trip Lengths

The Draft EIR states that in order to determine the emissions from trucks, the operational air quality impact analysis was modeled on the assumption that the average daily truck trip length is 33.2 miles.[12] The Proposed Project site, however, is located approximately 88 miles away from the Ports of Long Beach and Los Angeles (Ports), which means that the air quality analysis underestimated the emissions from trucks traveling from the Ports to the Proposed Project site. For this reason, Staff recommends the Lead Agency revise the calculations in the Final EIR by taking a project-specific approach to the vehicle trip length. Tailoring this parameter so that it is based on project-specific data will ensure a more accurate assessment of emissions, accounting for the unique circumstances and logistical realities of the Proposed Project. cont'd 4

Use of South Coast AQMD's Mass Rate Localized Significance Threshold (LST) Look-Up Table to Analyze the Proposed Project's Localized Air Quality Impact is not Consistent with Guidance for the LST Methodology

The Proposed Project covers approximately 20.17 acres. The Lead Agency uses South Coast AQMD's Mass Rate LST Look-up Table for five acres as a screening tool to determine if the Proposed Project's operational daily emissions of NOx, CO, PM10 and PM2.5 could result in a significant impact to local air quality.[13,14] South Coast AQMD staff, however, developed the LST methodology for proposed projects that are less than or equal to five acres.[15] For projects that are greater than five acres in size, Staff recommends lead agencies perform project-specific dispersion modeling to determine operational localized air quality impacts. Staff therefore recommends the Lead Agency: 1) perform project-specific air dispersion modeling for the Proposed Project's operational phase emissions to determine localized air quality impacts; and 2) include the results in the Final EIR. 5

Additionally, the Draft EIR states that during construction up to a maximum of 3.5 acres per day may be actively disturbed (see Table 1 below).[16] The Lead Agency then uses South Coast AQMD's Mass Rate LST Look-up Table (adjusted for 3.5 acres) as a screening tool to determine if the Proposed Project's daily construction emissions of NOx, CO, PM10 and PM2.5 could result in a significant impact to local air quality.[17,18] Staff, however, found that during construction up to a maximum of 4 acres per day may be disturbed during grading.[19] Staff therefore recommends the Lead Agency: 1) recalculate the maximum acres graded per day during construction; 2) update the LST thresholds accordingly; and 3) include the updated results in the Final EIR. 6

[12] Draft EIR. 4.2 Air Quality. Page 4.2-19.
[13] *Ibid.* Page 4.2-28.
[14] South Coast AQMD Appendix C – Mass Rate LST Look-up Table. Access here: http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-lst-look-up-tables.pdf
[15] Final LST Methodology, July 2008. Page 1-1, 3-3, & 3-4. Access here: http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf
[16] Draft EIR. 4.2 Air Quality. Page 4.2-27.
[17] *Ibid.*
[18] South Coast AQMD Appendix C – Mass Rate LST Look-up Table. Access here: http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-lst-look-up-tables.pdf
[19] Draft EIR. Appendix B1. Air Quality Assessment. Page 68 of 85 of CalEEMod output file.

2

Brandon Clearly, Associate Planner July 18, 2024

Table 1. Equipment-Specific Grading Rates

Construction Phase	Equipment Type	Equipment Quantity	Acres Graded per 8-Hour Day	Operating Hours per Day	Acres Graded per Day
Site Preparation	Tractors	4	0.5	8	2.0
	Graders	0	0.5	8	0
	Dozers	3	0.5	8	1.5
	Scrapers	0	1	8	0
				Total Acres Graded per Day	3.5

Table 2. South Coast AQMD Staff's Calculation of Maximum Acres Disturbed per Day During Construction

Construction Phase	Equipment Type	Equipment Quantity	Acres Graded per 8-Hour Day	Operating Hours per Day	Acres Graded Per Day
Grading	Tractors	2	.5	8	1
	Graders	1	.5	8	.5
	Dozers	1	.5	8	.5
	Scrapers	2	1	8	2
			Total Acres Graded per Day		4.0

cont'd 6

Additionally, the LSTs for construction emissions in the Draft EIR differ from those stated in Appendix B1, Air Quality Assessment.[20,21] These LST thresholds should match. Staff therefore recommends the Lead Agency revisit the LSTs for construction and update them accordingly throughout the Draft EIR and associated appendices. 7

Cumulative Impacts During Operation

Table 3-1 of the Draft EIR provides a list of 48 projects that are considered in the cumulative impact analysis of the Proposed Project.[22] Of these 48 projects, four near to the Proposed Project site are also warehouse land use projects (project #27, #34, #38 and #48).[23] According to Table 3-1, the aforementioned four projects together with the Proposed Project would result in a total of approximately 1,591,393 sq ft of warehouse development. 8

Additionally, Per CEQA Guidelines Section 15065(a)(3), South Coast AQMD staff is primarily concerned with the cumulative air quality impacts from increased concentrations of air toxics in the region. Pursuant to CEQA which requires an analysis of direct, indirect, and cumulative impacts, South Coast AQMD has initiated a public process to develop additional guidance for evaluating cumulative air quality impacts from increased concentrations of air toxics for CEQA projects. As of the date on this comment letter, there have been five public working group meetings (WGMs) allocated to development of this proposed cumulative impact policy. For general information on WGMs #1 through #5 and to gain familiarity with this developing policy, please visit South Coast AQMD's webpage at https://www.aqmd.gov/home/rules-compliance/ceqa/ceqa-policy-development-(new). 9

Given the aforementioned, Staff recommends that, at minimum, the Lead Agency perform a qualitative analysis in order to disclose the potential cumulative impacts from air toxics in consideration by listing all surrounding past, present, and probable future projects. The Lead Agency may also perform a more 10

[20] Draft EIR. 4.2 Air Quality. Page 4.2-27.
[21] *Ibid.* Appendix B1. Air Quality Assessment. Page 29.
[22] *Ibid.* 3.0 Basis of Cumulative Analysis. Page 3-3 through 3-4.
[23] *Ibid.* 3.0 Basis of Cumulative Analysis. Page 3-5.

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detailed and robust quantitative analysis of cumulative air toxics and its potential health risk implications and include such an analysis in the Final EIR.

cont'd 10

Additional Recommended Air Quality and Greenhouse Gases (GHG) Project Design Considerations

Staff notes that the Proposed Project's existing General Plan Land Use Designation is Economic Development Corridor - Northern Gateway (EDC-NG).[24] This land use designation allows for the development of industrial, commercial, office, civic, entertainment, education and/or recreational uses, and residential.[25] As noted in the previous comment, approximately 1,591,393 sq ft of warehouse development is already planned for the EDC-NG area. Furthermore, the EDC-NG area is located approximately 360 feet north of numerous residential land use designations (see Figure 1 below).[26] Currently a large portion of land parcels that are east and west adjacent to the Proposed Project site are utilized for farming activities (see Figure 2 below).[27] South Coast AQMD is concerned about the potential public health impacts of siting new air pollution sources (such as DPM emissions from the Proposed Project) in proximity to sensitive populations. For the above reasons, prior to approving this Proposed Project, Staff recommends the Lead Agency consider additional project design features (PDFs) to further reduce the Proposed Project's air quality and GHG impacts. Staff recommends incorporating the following PDFs into the Final EIR:

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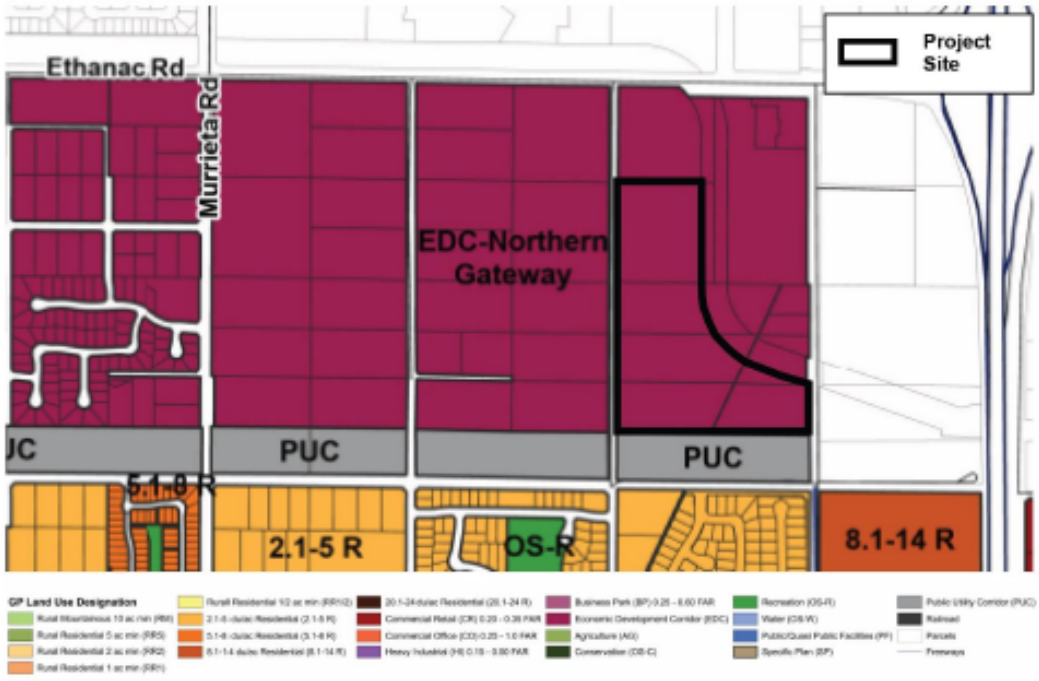

Source: City of Menifee. (2023). General Plan - Land Use Map

Figure 1. Screenshot of Draft EIR, Existing General Plan Land Use Designation. Page 2-8

[24] Draft EIR. 2.0 Project Description, Exhibit 2-3 Existing General Plan Land Use Designation. Page 2-8.
[25] *Ibid.* 1.0 Introduction and Purpose. Page 1-1.
[26] *Ibid.* 2.0 Project Description, Exhibit 2-3 Existing General Plan Land Use Designation. Page 2-8.
[27] *Ibid.* 2.0 Project Description, Exhibit 2-2 Local Vicinity Map. Page 2-7.

4

Brandon Clearly, Associate Planner July 18, 2024

Figure 2. Screenshot of Draft EIR, Local Vicinity Map of Proposed Project site, Page 2-7

cont'd 11

PDFs for Construction and 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 California Air Resources Board's (CARB) adopted optional NOx emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr), if and when feasible. 12

   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. 13

   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. 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. 14

4. Provide electric vehicle (EV) charging stations or, at a minimum, provide electrical infrastructure, and electrical panels should be appropriately sized. Electrical hookups should 15

5

be provided for truckers to plug in any onboard auxiliary equipment. 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.

cont'd 15

PDFs 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.

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Design Considerations for Reducing Air Quality and Health Risk Impacts

1. Design the Proposed Project such that any truck check-in point is inside the Proposed Project site to ensure no trucks are queuing outside.
2. Design the Proposed Project to ensure that truck traffic inside the Proposed Project site is as far away as feasible from sensitive receptors.
3. Restrict overnight truck parking in sensitive land uses by providing sufficient overnight truck parking inside the Proposed Project site.

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Lastly, 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[28]
2. South Coast AQMD 2022 Air Quality Management Plan,[29] 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 Measure
3. United States Environmental Protection Agency (U.S. EPA): Mobile Source Pollution - Environmental Justice and Transportation[30]

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South Coast AQMD Air Permits and Role as a Responsible Agency

The Draft EIR states that the Proposed Project may be required to obtain permits from South Coast AQMD for two emergency backup generators.[31] If implementation of the Proposed Project would require the use of new stationary and portable sources, including but not limited to emergency generators, fire

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[28] State of California Department of Justice. Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act. Available at: https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/warehouse-best-practices.pdf

[29] South Coast AQMD, 2022 Air Quality Management Plan. Available at: http://www.aqmd.gov/home/air-quality/air-quality-management-plans/air-quality-mgt-plan

[30] US.EPA. Mobile Source Pollution - Environmental Justice and Transportation. Available at: https://www.epa.gov/mobile-source-pollution/environmental-justice-and-transportation

[31] Draft EIR. 4.2 Air Quality. Page 4.2-19.

6

water pumps, boilers, spray booths, etc., air permits from South Coast AQMD will be required and the role of South Coast AQMD would change from a Commenting Agency to a Responsible Agency under CEQA. In addition, if South Coast AQMD is identified as a Responsible Agency, per CEQA Guidelines Sections 15086, the Lead Agency is required to consult with South Coast AQMD. CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of evaluating the applications for air permits. For these reasons, the Final EIR should include a discussion about any new stationary and portable equipment requiring South Coast AQMD air permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project. cont'd 19

The Final EIR should also include calculations and analyses for construction and operation emissions for the new stationary and portable sources, as this information will also be relied upon as the basis for the permit conditions and emission limits for the air permit(s). Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions regarding what types of equipment would require air permits. For more general information on permits, please visit South Coast AQMD's webpage at: http://www.aqmd.gov/home/permits. 20

Conclusion

As set forth in California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), the Lead Agency shall evaluate comments from public agencies on the environmental issues and prepare a written response at least 10 days prior to certifying the Final EIR. As such, please provide South Coast AQMD written responses to all comments contained herein at least 10 days prior to the certification of the Final EIR. In addition, as provided by CEQA Guidelines Section 15088(c), if the Lead Agency's position is at variance with recommendations provided in this comment letter, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided. 21

Thank you for the opportunity to provide comments. South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Evelyn Aguilar, Air Quality Specialist, at eaguilar@aqmd.gov should you have any questions. 22

Sincerely,

Sam Wang

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

SW:EA
RVC240612-05
Control Number

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Response to Comment Letter A4 - South Coast Air Quality Management District
Sam Wang, Program Supervisor, CEQA IGR

A4-1 This comment includes introductory statements and therefore, no further response is warranted.

A4-2 The comment includes a summary of the Project description. No further response is warranted.

A4-3 The commenter provides a brief summary of the Project and identifies existing sensitive receptors. The introductory comment does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue. The comment has been noted and no further response is warranted**.**

A4-4 The Air Quality Assessment used a truck trip length of 33.2 miles in the emissions modeling based on the California Air Resources Board document *Emissions Estimation Methodology for On-Road Diesel-Fueled Heavy-Duty Drayage Trucks at California Ports and Intermodal Rail Yards*. It should be noted that this distance is specific to transloading/local distribution facilities and the longest (i.e., most conservative) distance identified in the study for the South Coast Air Basin. Shorter distances are identified for other locations such as off-terminal and intermodal facilities. The CARB study used GIS to estimate travel distances. CARB explains that that estimating travel distances to/from the Ports of Los Angeles and Long Beach to distribution and transloading facilities is complicated because there are thousands of facilities and the number of trips to each facility and location of each facility is unknown. Therefore, CARB used the Ports' truck trip origin and destination (O-D) survey data to estimate distribution center travel distances.

The CalEEMod methodology uses average trip lengths, which accounts for some longer trips (e.g., to/from the Ports or other location) and some shorter trips (e.g., to/from other facilities or warehouses in the area). Goods movement can involve several steps (i.e., origin and destination) between the port and a particular warehouse, intermodal facility, or other facility. Each step would be a separate trip. As such, not all truck trips would originate from the Ports; some trips may be from intermodal facilities, storage warehouses, cross-dock warehouses, distribution centers, retail stores, etc. Truck trips would likely be redistributed from other existing locations. As described above, the CARB truck trip lengths used in the Air Quality Assessment are based on substantial evidence and representative of warehouse truck trips to/from the Ports in the South Coast Air Basin (i.e., the region where the Project is located).

Based on the State Office of Planning and Research (OPR) Technical Advisory (page 4), " 'vehicle miles traveled' refers to the amount and distance of automobile travel attributable to a project," where automobile refers to passenger vehicles, specifically cars and light trucks. VMT generated from trucks are not considered in the VMT impact assessment based on the OPR Technical Advisory. This is due in part with the understanding that trucks are already on the regional roadway network with or without the Project, such as traveling to/from the Ports and using major freeways to end up at their final destinations. The addition of this Project may likely result in a net decrease in regional VMT, as these projects are strategically located near delivery points, thereby reducing trip lengths by providing additional regional warehouses.

A4-5 The Air Quality Analysis located in Appendix B of the Draft EIR uses the SCAQMD 's *Mass Rate Localized Significance Threshold (LST) Look-Up Table* to analyze LST impacts. The mass rate look-up table identifies the maximum allowable construction and operation emissions without generating significant localized air quality impacts based on the Project location, project size (ranging between 1, 2, and 5 acres), and the distance from sensitive receptors (ranging from 25 meters or less, 50 m, 100 m, 200, and 500 m). As a project increases in size, the allowable emissions continue to increase. The LST screening thresholds are based on dispersion modeling conducted by the SCAQMD. The screening thresholds for sites 1-, 2-, and 5-acres in size were only modeled by the SCAQMD. The commenter noted that the Project is 20.17 acres, however as discussed in Section 4.2.5 of the Draft EIR, the Project uses a disturbance area of 3.5 acres per day in the analysis. Therefore, the construction emissions threshold for 3.5 acres was interpolated from the 2-acre threshold and the 5-acre threshold. The operational LST analysis conservatively used the 5-acre emission screening thresholds (i.e., a larger site acreage would have higher/less conservative thresholds because the pollutants would have more area to disperse). As shown in Table 4.2-11 and Table 4.2-12, the Project generated less emissions than is permitted for a 3.5-acre construction site and a 5-acre warehouse site. Because the emissions generated by the Project are less than those permitted for a smaller site, it is reasonable to assume that the Project would not generate significant localized air quality impacts even though the Project site is 20.17 acres.

A4-6 The LST analysis conservatively assumed 3.5-acres would be disturbed per day as shown in Table 4.2-10 of the Draft EIR. However, the commenter notes that SCAQMD staff found that up to a maximum of 4 acres may be disturbed during grading. As discussed above, as the area of disturbance increases, the allowable emissions increase until maxing out at 5-acre levels. Therefore, using the 3.5-acre threshold is more conservative than using the 4-acre threshold. For informational purposes, the results from Table 4.2-11: Localized Significance of Construction Emissions have been updated with the construction thresholds for 4 acres of disturbance in the table below. As shown, the screening thresholds increase, and impacts remain less than significant.

Description	**Emissions (Maximum Pounds Per Day)**			
	NO_X	**CO**	**PM_{10}**	**$PM_{2.5}$**
Site Preparation Emissions	36.00	32.90	1.60	1.47
Grading Emissions	34.30	30.20	1.45	1.33
Building Construction Emissions	10.40	13.00	0.43	0.40
Paving Emissions	7.45	9.98	0.35	0.32
Architectural Coating Emissions	0.88	1.14	0.03	0.03
Infrastructure Improvement Emissions	2.12	2.46	0.08	0.08
Maximum Emissions	36.00	32.90	1.60	1.47
SCAQMD Localized Screening Threshold (adjusted for 4 acres at 107 meters)	348	3,263	55	15
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**

A4-7 As shown in Errata Exhibit 2-7: Conceptual Site Plan – Building 2, the southern portion of the site was identified as a future road and was not originally included in the analysis, therefore the closest sensitive receptor was identified as being 123 meters from the construction area. When the Project was updated to include the southern portion of the Project site, the distance to the closest sensitive receptor was updated to 107 meters. Although the distance was not updated in the Air Quality Assessment, the correct values are presented in the Draft EIR. As shown in Tables 4.2-11 and 4.2-12 of the Draft EIR, emissions remain below the thresholds identified for sensitive receptors located 107 meters from the construction boundary area.

A4-8 The comment includes a statement of nearby warehouse cumulative projects #'s 27, 34, 38, and 48 and their total square footage of approximately 1,591,393 square feet. No further response is warranted here but refer to the following Responses to Comments A4-9 and A4-10 for further discussion.

A4-9 The commenter notes that SCAQMD is concerned with cumulative air quality impacts. The commenter also notes that SCAQMD has initiated a public process to develop guidance for evaluating cumulative air quality impacts however no final methodologies or thresholds have been adopted. The comment does not raise a specific issue with the adequacy of the Draft EIR. The comment has been noted and no further response is warranted.

A4-10 The commenter suggests performing a qualitative analysis of cumulative impacts. A discussion of this topic can be found on pages 4.2-36 and 4.2-37 of the Draft EIR. Additionally, cumulative past, present, and probable future projects are listed in Draft EIR Table 3-1: List of Cumulative Projects and are shown on Draft EIR Exhibit 3-1: Location of Cumulative Projects. The Draft EIR lists 48 cumulative projects. As discussed, air emissions are largely a cumulative impact and SCAQMD has developed thresholds of significance based on the level above which individual project emissions would result in a cumulatively considerable contribution to air basin's existing air quality conditions.[1] Therefore, a project that exceeds the SCAQMD operational thresholds would also result in a cumulatively considerable contribution to a significant cumulative impact and, inversely, emission volumes below the SCAQMD operational thresholds are not cumulatively considerable. The analysis follows the approach in South Coast AQMD's *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution*.

The cumulative projects identified in the comment are also subject to CEQA and are required to mitigate potential impacts to the extent feasible. These projects (as with the Project) are also required to comply with all applicable SCAQMD rules and regulations, which would minimize emissions. Draft EIR Table 4.2-9 shows that the Project would not exceed the SCAQMD operational thresholds. Therefore, as discussed in section 4.2.6 of the Draft EIR, the Project's emissions would not result in a cumulatively considerable contribution to significant cumulative air quality impacts.

[1] South Coast Air Quality Management District, White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution, Appendix D, 2003.

A4-11 The commenter summarizes the Project and notes the distance of sensitive receptors from the Project. A Health Risk Assessment was prepared for the Project and included in Appendix B of the Draft EIR. In addition, the results of the study can be found in Table 4.2-13: Carcinogenic Risk Assessment and 4.2-14: Chronic Hazard Assessment in the Draft EIR. As demonstrated in these tables, risks to sensitive receptors from toxic air contaminants are reduced to less than significant with mitigation. Therefore, there is no nexus for additional mitigation.

A4-12 The commenter suggests implementing project design features to reduce impacts from mobile sources. Although the commenter calls them project design features, they are mitigation measures.

The first measure suggests requiring zero-emission or near zero-emission on-road haul trucks. The suggested measures contained in the comment related to zero- and near-zero emission (ZE and NZE) vehicles are not feasible to implement, because the availability of vehicles equipped with such technology in the Project's opening year is speculative. Even with adoption of CARB's Advanced Clean Truck Rule, CARB acknowledges that it will take time for ZE and NZE vehicles to become commercially available and to penetrate the market. For example, CARB's Staff Report for the Proposed Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure (March 26, 2024) explains that the regulation requires manufacturers to sell an increasing percentage of ZE trucks in California. Additionally, by 2035 ZE truck/chassis sales would need to be 55 percent of Class 2b – 3 truck sales, 75 percent of Class 4 – 8 straight truck sales, and 40 percent of truck tractor sales.[2] Based on the regulation's phase-in, it will take time for fleets to turn over and for the ZE percentages of new truck sales to penetrate the market.

As discussed in Draft EIR pages 4.7-26 and 4.7-27, trucks accessing the Project site would be subject to the Advanced Clean Truck Regulation, CARB's Mobile Source Strategy, CARB's Sustainable Freight Action Plan, and CARB's Emissions Reduction Plan for Ports and Goods Movement. Additionally, trucks are subject to the Heavy-Duty Low NOX Omnibus Regulation and SCAQMD's Rule 2305 – WAIRE Program. These regulations are required for all trucks and the suggested mitigation measure is already part of the existing regulatory environment and would not be considered mitigation under CEQA**.**

A4-13 The second measure suggests requiring a phase-in schedule to incentivize the use of cleaner trucks. However, the CARB approved the Advanced Clean Fleets (ACF) Regulation which implements a phase-in schedule for transitioning truck fleets to ZE vehicles.[3] The ACF Regulation requires fleet operators to replace vehicles with ZE trucks based on age or mileage milestones.[4] As this regulation is already required, it does not qualify as mitigation under CEQA.

A4-14 The third measure suggests limiting the number of trucks allowed to access the Project to levels analyzed in the Final CEQA document. The City disagrees with the suggestion that the Final EIR

[2] https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2022/acf22/isor2.pdf
[3] https://ww2.arb.ca.gov/resources/fact-sheets/advanced-clean-fleets-regulation-overview
[4] https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2022/acf22/ac/acffrod31.pdf

should include a limit on the daily number of trucks allowed at the Project to levels that were analyzed in the EIR and would require re-evaluating impacts through CEQA should daily truck trips from the Project be anticipated to exceed those levels. The analysis is based on a set of realistic, but conservative, set of assumptions regarding the magnitude of potential activities. The Project's air quality and GHG analysis is consistent with the TIA which assumed 184 daily truck trips and 497 daily passenger vehicle trips based on ITE Code 150 Warehouse. Therefore, the City does not anticipate total emissions (combined passenger vehicle and truck trips) to exceed those modeled in the EIR, and future re-evaluation is not necessary.

A4-15 The fourth measure suggests providing EV charging stations and electrical hookups for truckers to plug in onboard auxiliary equipment. The Project will be consistent with the EV charging requirements in the 2022 CALGreen building code for warehouses and **MM AQ-3** requires the electrical to be oversized to accommodate equipment for future EV charging stations and designate areas for future truck charging. The Project does not require the installation of electrical hookups at dock doors as the Project does not include cold storage and will not employ trucks with transport refrigeration units (TRUs). However, electric hookups can be installed by future tenants if requested. Therefore, the Project would be consistent with this recommended measure.

A4-16 The commenter suggests implementing project design features to reduce impact from other source areas:

1) Maximize the use of solar energy by installing solar energy arrays

   The Table 4.7-3: Project Greenhouse Gas Emissions on page 4.7-20 of the Draft EIR shows that total GHG emissions are below SCAQMD's threshold. Therefore, mitigation measures requiring the installation of solar panels to reduce GHG emissions is not necessary. However, the Project would comply with all building code requirements and may add solar panels in the future if desired.

2) Use light-colored paving and roofing materials.

   California's Title 24, Part 6 Building Energy Efficiency Standards includes cool roof requirements for new and existing buildings. These requirements are in the following sections of the 2022 Title 24, Part 6 standards:

   - Section 10-113(a, b) (Mandatory Certification and Labeling of Roofing Product Reflectance and Emittance)
   - Section 110.8(i) (Mandatory Insulation, Roofing Products & Radiant Barriers)
   - Section 140.1 (Performance Approach: Energy Budgets (Nonresidential))
   - Section 140.2 (Prescriptive Approach (Nonresidential))
   - Section 140.3(a)1 (Prescriptive Requirements for Building Envelopes (Nonresidential))

Therefore, since Title 24, Part 6 Building Energy Efficiency Standards applies to the Project, the Project would be consistent with this recommended measure. Additionally, the Project's truck courts would be paved with concrete, which is light-colored. The increased stiffness of concrete makes it able to withstand heavier wheel loads without risk of rutting.

A4-17 The commenter suggests implementing project design features to reduce air quality and health risk impacts:

1) Design the Project such that any truck check-in point is inside the Project site to ensure no trucks are queuing outside.

   The Project is a speculative warehouse; therefore, the site plan does not include check-in points. However, the Project does include a large driveway located on Evans Road that will be used to access the two buildings and allow trucks to queue onsite. Future check-in points will be built by the tenant based on their operational needs. These check-in points would comply with all applicable code and would require the approval of the City. Consistent with the commenters request, queuing will not occur outside the Project area.

2) Design the Project to ensure that truck traffic inside the Project site is as far away as feasible from sensitive receptors.

   The Project has been designed to keep truck traffic away from sensitive receptors. Truck parking is located in the center of the site so that sensitive receptors are shielded from noise by the warehouse buildings. Warehouse docking doors are setback approximately 775 feet from the property line of the nearest sensitive receptor. As a result, Project parking and drive aisles are located as far from sensitive receptors as possible.

3) Restrict overnight truck parking in sensitive land uses by providing sufficient overnight truck parking inside the Project site.

   The Project is required to provide adequate on-site parking in accordance with the City's parking standards. Therefore, the Project would be consistent with this recommended measure.

A4-18 The commenter provides a list of documents to review and suggests adding any applicable mitigation measures. These documents have been reviewed; however, additional mitigation measures are not necessary because the Project has already incorporated mitigation to reduce impacts to less than significant.

A4-19 The commenter states that if the Project requires the use of new stationary and portable sources, including but not limited to emergency generators, fire water pumps, etc., air permits from SCAQMD will be required, and the role of SCAQMD would change from a Commenting Agency to a Responsible Agency under CEQA. However, the Project is speculative, and no end user has been identified. Therefore, the Project has no plans at this time to install emergency generators or other permitted stationary equipment. Emissions from emergency generators were included in

the GHG analysis as seen in Table 4.7-3 of the Draft EIR in order to analyze a worst-case scenario. Following construction of the Project any future tenant that requires the use of a generator or stationary equipment with an internal combustion engine would be required to obtain permits from SCAQMD prior to installation.

As previously stated, the Project is speculative and there are no known permitted stationary sources identified as part of the Project. Therefore, SCAQMD would remain a Commenting Agency and is not considered a Responsible Agency.

A4-20 Construction and operation emissions are calculated in CalEEMod and the results are included in the output files in Appendix B and Appendix G.

A4-21 Refer to Response to Comments A4-3 through A4-20 above. The issues raised in these comments have been addressed in detail, and the City's responses have been provided in good faith, and contain reasoned analysis, without resort to unsupported conclusory statements.

The comment requests that the City comply with CEQA when responding to SCAQMD's comments. As requested, the City's responses to SCAQMD's comments will be sent to the SCAQMD as part of the Final EIR distribution prior to certification of Final EIR. As the comment does not raise any issues with respect to the content and adequacy of the Draft EIR or the Project's environmental effects, no further response is warranted. The comment is included here to provide a complete record of the SCAQMD's letter. The comment will become part of the administrative record and will be considered by the decision-makers.

A4-22 The comment includes conclusionary statements and therefore, no further response is warranted**.**

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Comment Letter A5 - City of Perris

Patricia Brenes, Planning Manager

Comment Letter - A5

CITY OF PERRIS
DEVELOPMENT SERVICES DEPARTMENT
PLANNING DIVISION
135 N. "D" Street, Perris, CA 92570-2200
TEL: (951) 943-5003 FAX: (951) 943-8379

July 22, 2024

Brandon Cleary
City of Menifee
Community Development Department
29844 Haun Road
Menifee, CA 92586

SUBJECT: CITY OF PERRIS COMMENTS – NOTICE OF AVAILABILITY (NOA) OF A DRAFT ENVIRONMENTAL IMPACT REPORT (EIR) FOR THE PROPOSED NORTHERN GATEWAY LOGISTICS CENTER – LOCATED ON SOUTH OF ETHANAC ROAD BETWEEN EAST SIDE OF EVANS ROAD AND BARNETT ROAD - PLN23-0040

Dear Mr. Cleary:

The City of Perris appreciates the opportunity to comment on the "Northern Gateway Logistic Center" ("Proposed Project") proposal to construct two industrial buildings totaling 398,252 square feet on 20.17 acres, located south of Ethanac Road between Evans Road and Barnett Road within the City of Menifee. 1

The Proposed Project is located south of the Green Valley Specific Plan (GVSP) in the City of Perris. The GVSP is a master-planned community totaling 1,269 acres of land envisioned to be developed with 3,460 single-family detached homes, 750 multi-family residential units, 42.3 acres of business and professional office space, 72.7 acres of commercial retail, 108.7 acres of industrial, 24 acres for three school sites, and 51.1 acres of public parks. Industrial zones are located adjacent to the Perris Valley Airport north of the San Jacinto River. Due to the proximity of residential uses to Ethanac Road, industrial development in the City of Perris is not allowed to utilize Ethanac Road as a truck route. 2

The City of Perris has expressed concerns about the proposed Project during the NOP comment period. After reviewing the Draft EIR and technical reports, the City believes the Project has not adequately addressed the potential environmental impacts related to air quality, energy, greenhouse gas emissions, land use, and transportation. Thus, the City continues to have concerns with the Project as detailed in the comments provided below. 3

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Air Quality

1. The operational air pollutant emissions associated with the project may be underestimated. The South Coast Air Quality Management District (AQMD) has informed the City of Perris in the past that the default trip lengths programmed into CalEEMod are not appropriate for the average trip distances of trucks traveling to and from warehouse projects. Instead, the South Coast AQMD has recommended that the default lengths be increased to account for the longer average truck trips. For example, the South Coast AQMD's Final Staff Report for Proposed Rules 2305 and 316 identify average trip lengths of 14.2 miles per trip for medium-heavy trucks and 39.9 miles for heavy-heavy duty trucks. These trip lengths are based on SCAG's 2016 Regional Transportation Plan modeling analysis. The South Coast AQMD recommends the use of these distances for the evaluation of air quality impacts from warehouses. 4

   There is no mention of changes to the default operational trip lengths within the text of the Draft EIR or Air Quality Assessment. Section 8. User Changes to Default Data in the CalEEMod results sheets also does not identify any changes to the default operational trip lengths. The environmental documents for other recent warehouse projects within the City of Menifee have changed the default values to the South Coast AQMD's recommendations in order to more realistically estimate the operational emissions associated with the proposed projects. This includes the recent Murrieta Road Warehouse Project. The City should confirm whether the default trip lengths were used for this analysis and, if so, the Air Quality Assessment and Draft EIR should be revised to increase the truck trip lengths to be consistent with South Coast AQMD recommendations and other recent projects in the City of Menifee. 5 6

2. The evaluation of air quality impacts discusses the speculative use of emergency backup generators and includes the emissions from this equipment in the estimates of operational air pollutant emissions. The City of Perris agrees that the proposed warehouses may not need emergency backup generators for general operation. However, the two buildings would require the installation, maintenance, and regular testing of emergency fire water pumps according to the California Fire Code (California Code of Regulations, Title 24, Part 9). Where provided, fire pumps for fire protection systems shall be installed in accordance with Section 913 of the California Fire Code and the National Fire Protection Association (NFPA) 20, Standard for the Installation of Stationary Pumps for Fire Protection. Fire pumps are generally powered by diesel engines. According to the National Fire Protection Association, diesel fire pumps must be tested on a weekly basis for a minimum of 30 minutes. This requirement is not speculative, and the analysis should be revised accordingly. 7 8

3. The evaluation of diesel particulate health risk impacts appears to be based on the emissions generated by construction equipment, mobile sources, off-road equipment, and emergency backup generators within the project site and experienced at nearby existing receptor locations. However, the analysis needs to confirm or be revised to evaluate the emissions from the diesel sources at the project site and traveling along the roadways between the project site and I-215. In addition, the analysis needs to identify the potential 9

health risk impacts to the residents of the Green Valley Specific Plan area to the immediate north of Ethanac Road. cont'd 9

Energy

4. As discussed above, the trip lengths for trucks traveling to and from the project site may not be appropriate for the average trip distances of trucks traveling to and from warehouse projects. An increased trip length for trucks would result in greater energy demands than what is estimated in the Draft EIR. The City should confirm whether the default trip lengths from CalEEMod were used for this analysis and, if so, the Draft EIR should be revised to be consistent with South Coast AQMD recommendations for longer trip lengths and other recent projects in the City of Menifee. 10

Greenhouse Gas Emissions

5. As discussed above, the trip lengths for trucks traveling to and from the project site may not be appropriate for the average trip distances of trucks traveling to and from warehouse projects. An increased trip length for trucks would result in greater greenhouse gas emissions than what is estimated in the Draft EIR. The City should confirm whether the default trip lengths from CalEEMod were used for this analysis and, if so, the Draft EIR should be revised to be consistent with South Coast AQMD recommendations for longer trip lengths and other recent projects in the City of Menifee. Given how close the current emissions estimates are to the City's threshold os significance, an increase in greenhouse gas emissions may result in a significant and unavoidable impact that was not identified in the Draft EIR. 11

Land Use Inconsistency with Surrounding Areas

6. The proposed industrial development is incompatible with the residential development in the City of Perris due to its proximity to the GVSP area. Allowing the proposed industrial development would generate truck traffic along Ethanac Road, as trucks are anticipated to access the site via Evans Road. The existing westbound left turn pocket on Ethanac Road at Evans Road was not designed for queuing of trucks to minimize impacts to existing and future residential development. To avoid land use impacts, it is recommended that trucks be required to access the site via Barnett Road only, as access via Evans Road would place queuing of trucks directly across the already entitled residential development in the GVSP area. 12

7. **Truck Circulation Route** – The developer should be required to prepare a Truck Circulation Plan. According to the site layout, truck access is proposed on Ethanac Road heading both east and westbound. Truck circulation needs to be minimized to avoid impacts to sensitive receptors and analyzed in light of other industrial projects in the development entitlement pipeline. In addition, it should be noted that the existing median on Ethanac Road is within Perris City limits and is not designed for truck queuing. 13

Transportation

General/Major Comments

8. The preparation of the site-specific traffic study for the Northern Gateway Logistics Center Project is premature in that the overall traffic study for the Menifee Economic Development Corridor (MEDC) needs to be completed first in order to master plan the entire MEDC area which encompasses the Northern Gateway Logistics Center Project. A more comprehensive review of the entire area along Ethanac Road needs to be completed before site-specific studies can be prepared for individual projects. 14

9. All four (4) study area intersections analyzed in this traffic study are either partially or entirely located within the City of Perris. For these intersections, along with any study roadway segments, the City of Perris traffic impact criteria must be utilized (see Appendix A). If the project has a direct impact, then the project will be responsible for completing the required improvements unless a funding mechanism can be identified (e.g., TUMF fees, DIF fees, completed by other development, etc.). 15

10. It is unclear from the traffic study if truck traffic will access the project via both Evans Road and Barnett Road. An interim conditions analysis should be conducted if truck access cannot be taken from Evans Road and 100% of trucks are required to enter/exit the site from Barnett Road. 16

11. It is our understanding that the Master Plan for the MEDC will be providing roadway connections for trucks that will not impact City of Perris non-truck route roadways. This must be considered as part of the traffic study and the analysis should be revised accordingly. 17

12. The traffic study will need to clearly identify what improvements are necessary, whether they have direct or indirect impact from the project, and how they will be implemented. Again, direct impacts will be determined for City of Perris intersections and roadway segments based upon the City of Perris traffic criteria. 18

Specific Traffic Study Comments

13. Page 1, First Paragraph. The traffic study will also have to follow City of Perris requirements for those intersections and roadway segments within the City of Perris. 19

14. Page 3, Figure 2: Site Plan. The site plan shows a "Future Road" bordering the site to the south. It does not appear as though this roadway was accounted for in the TIA. Further clarification is needed including the following: 20

    a. Who will be building this roadway?
    b. What is the timing for construction of this roadway?
    c. Will this be a private or public road?

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Depending on the answers above, additional analysis may be needed as circulation could be affected. cont'd 20

15. Page 4, Study Locations. The traffic study should identify whether the intersections and roadway segments are located within the City of Menifee, Perris or both. For those intersections and roadway segments located in the City of Perris, the City of Perris impact criteria and thresholds need to be utilized, as opposed to City of Menifee criteria. 21

16. Page 5, Figure 3. Existing Lane Configuration and Traffic Control. Study Intersection #2 actually consists of two separate (offset) intersections (Barnett Road & Case Road). Both of these intersections should be analyzed separately (from a LOS and queuing standpoint), and the recommended improvements should involve realigning Barnett Road with Case Road (and other associated intersection improvements if necessary). The project shall pay a fair share contribution towards this realignment, or 100% of the cost if the project directly impacts these intersection(s). 22

17. Page 8, Level of Service Standards and Major Measures of Significance. For roadway segments and intersections in the City of Perris, the City of Perris criteria should be utilized. 23

18. Page 13, Figure 6. Intersection #2 should be shown (and analyzed) as two separate intersections, since they do not align with each other. 24

19. Page 18, Figure 7. Project Trip Distribution. The project distribution needs to be updated to show both the passenger vehicle and truck turning percentages at each intersection. Currently, it is unclear how project traffic enters/exits the project site. An interim conditions analysis should be conducted if truck access cannot be taken from Evans Road and 100% of trucks are required to enter/exit the site from Barnett Road. 25

20. Page 2s, Table 4 - Summary of Intersection Operations – Existing Plus Project. This table needs to include what jurisdiction each study intersection is located within to determine which intersections are considered directly impacted per City of Perris criteria. 26

21. Page 25 and 26, Figure 10 and Table 6. The City of Perris Planning Department will need to review and confirm the list of cumulative projects is accurate within the City of Perris. 27

22. Page 34, Table 9: Summary of Intersection Operation Opening Year 2025 Cumulative Plus Project. As previously described, Study Intersection #2 actually consists of two separate (offset) intersections (Barnett Road & Case Road). The currently reported delay (which again, is incorrect because both intersections are analyzed together as a single intersection), is very close to operating at deficient LOS. There is a "no right-turn on red" sign for SBR vehicles from southbound Case Road onto westbound Ethanac Road. Please confirm this turn restriction is accounted for as it would worsen the intersection LOS, potentially dropping it to an unacceptable level. 28

23. Page 37, Recommend Improvements. The realignment of Barnett Road/Case Road at Ethanac Road needs to be considered as a possible recommendation for improving the level of service and queuing along Ethanac Road, ultimately increasing traffic safety. 29

24. Pages 38 to 39, Recommended Improvements. For direct project impacts of City of Perris transportation facilities, the project shall be 100% responsible that all necessary improvements are installed to mitigate these impacts (or via some other defined improvement program) prior to project occupancy. It is also unclear how these improvements would be implemented and who would be responsible for providing the required improvements. Additional detail is needed on the funding mechanisms that will be utilized to make these required improvements. 30

25. Page 42, Storage Capacity at Left Turn Pockets. Study Intersection #2 actually consists of two separate (offset) intersections (Barnett Road & Case Road). This analysis should also evaluate both of these intersections separately (i.e., Barnett Road at Ethanac Road & Case Road at Ethanac Road) due to the limited spacing between both intersections. 31

Furthermore, the City of Perris is concerned about the project's impact to queuing/progression along Ethanac Road at the I-215 interchange. A simulation analysis should be conducted to identify any queuing deficiencies, and if applicable, improvements should be identified. 32

26. Page 42, Left Turn Lane Recommended Lengths. Several of the recommendations call for left-turn pockets in excess of 300 feet. Given these long storage length requirements, would it be more appropriate to consider dual left-turn lanes at these locations? This also pertains to Table 14. 33

Furthermore, the recommendation of extending the WBL turn pocket at Evans Road to 475 feet does not leave adequate storage for a future EBL turn pocket at Green Valley Parkway. Refinements to these improvements are necessary. 34

27. General: It doesn't appear any of the proposed driveways are analyzed. Please include a site access analysis which shall account for LOS analysis, truck turning templates, queuing analysis, and driveway spacing requirements. 35

CEQA. 36

28. The City of Perris reserves the right to provide further comments on the environmental topics analyzed in the Draft EIR as the project moves forward in the process. Please provide future notices prepared for the Project pursuant to the California Environmental Quality Act ("CEQA") under any provision of Title 7 of the California Government Code governing California Planning and Zoning Law which includes: notices of any public hearing held pursuant to CEQA.

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The City of Perris appreciates the opportunity to comment on this Project and related Draft EIR. Please feel free to contact me at (951) 943-5003, ext. 355 or pbrenes@cityofperris.org, if you have any questions or would like to discuss the above concern in further detail. 37

Sincerely,

Patricia Brenes
Planning Manager

cc: Clara Miramontes, City Manager
Wendell Bugtai, Assistant City Manager
Robert Khuu, City Attorney
John Pourkazemi, Interim City Engineer
Kenneth Phung, Director of Development Services

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Response to Comment Letter A5 - City of Perris

Patricia Brenes, Planning Manager

A5-1 This comment includes an introductory statement and brief Project description. No further response is warranted.

A5-2 The description of the GVSP located north of the Project site is noted. This comment does not raise any specific reasons why a warehouse use cannot be compatible with nearby areas that are used for residential purposes. Lastly, Ethanac Road is designated as a truck corridor in the City of Menifee's General Plan. As such, trucks utilizing Ethanac Road for access is appropriate.

A5-3 The commenter states that the Draft EIR did not adequately addressed the potential environmental impacts related to air quality, project alternatives, energy, greenhouse gas emissions, land use, noise, and transportation. This portion of the comment does not raise specific concerns and therefore no further responses is warranted. Responses to the City of Perris' specific concerns regarding the inadequacy of the Draft EIR are provided below.

A5-4 CalEEMod truck trip lengths, which are utilized in the Draft EIR Air Quality Assessment, were updated to 33.2 miles based on a CARB study entitled *Emissions Estimation Methodology for On-Road Diesel-Fueled Heavy-Duty Drayage Trucks at California Ports and Intermodal Rail Yards* which determined the average truck distance from port terminals to local distribution facilities. Refer to Response A4-4, which explains why this average trip length is appropriate for the Project.

A5-5 The CalEEMod default for the one-way warehouse trip length of 11.50 miles was replaced with 33.2 miles, based on the *CARB study entitled Emissions Estimation Methodology for On-Road Diesel-Fueled Heavy-Duty Drayage Trucks at California Ports and Intermodal Rail Yards*. This distance is consistent with other recent warehouse projects within the City of Menifee. Due to updates in the CalEEMod program, some changes to the default settings are no longer displayed in the CalEEMod outputs. However, the mileage used can be easily identified by reviewing Section 5.9 Operational Mobile Sources of the Air Quality Assessment Appendix A, located in Appendix B of the Draft EIR and dividing VMT/Year by Trips/Year to get trip length. See excerpt below.

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Unrefrigerated Warehouse-No Rail	184	184	184	67,160	6,109	6,109	6,109	2,229,712
Parking Lot	497	497	497	181,405	7,590	7,590	7,590	2,770,401
General Office Building	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

As shown, 2,229,712 vehicle miles traveled ÷ 67,160 trips = 33.2 miles per trip.

A5-6 The commenter questions whether CalEEMod trip lengths were used in air quality analysis for the Draft EIR. As discussed above under responses A5-4 and A5-5, the default tip length of 11.50 miles generated by CalEEMod was replaced with 33.2 miles base on the CARB study entitled *Emissions*

Estimation Methodology for On-Road Diesel-Fueled Heavy-Duty Drayage Trucks at California Ports and Intermodal Rail Yards. This distance is consistent with other recent warehouse projects within the City of Menifee.

A5-7 The Project includes an early-suppression fast-response (EFSR) fire sprinkler system and will use an electric or diesel-powered fire pump to provide additional water pressure. If an electric fire pump is installed, in the event that the building loses electricity, power for the electric fire pump will be provided by the emergency backup generator. As noted on page 4.2-19 and page 4.7-20 of the Draft EIR, emissions from emergency backup generators are included in the operational air quality and GHG analysis of the Project.

A5-8 The commenter notes that diesel powered fire pumps must be tested on a weekly basis for a minimum of 30 minutes. Conservatively, the analysis for this Project assumed that diesel generators would operate for one hour every week and included those emissions in Table 4.2-9 of the Air Quality Section and Table 4.7-3 of the GHG Section of the Draft EIR. Therefore, the Draft EIR analysis conservatively overestimates the contribution from stationary diesel emissions sources by assuming one hour of testing rather than 30 minutes of testing.

A5-9 The commenter notes that health risk impacts are based on emissions generated by construction equipment, mobile sources, off-road equipment, and emergency backup generators within the site and suggests that the analysis needs to include emissions from vehicles traveling on roadways. However, the commenter is incorrect in assuming mobile sources are only analyzed on site. As shown on page 4 of the Health Risk Assessment Appendix A, located in Appendix B of the Draft EIR, offsite truck routes analyzed include Ethanac Road, Evans Road, and Barnett Road.

The commenter also suggests identifying impacts to residents north of Ethanac Road. The Health Risk Assessment includes health risk results for receptors up to 722 feet north of the Ethanac Road centerline. As identified in Table 4.2-13: Carcinogenic Risk Assessment, the maximum cancer risk with mitigation is 1.73 in one million which is below SCAQMD's threshold of 10 in one million.

A5-10 Refer to Response A5-4 and A5-5.

A5-11 Refer to Response A5-4 and A5-5.

A5-12 This comment contends that the Project's warehouse use is not compatible with the GVSP and residential land uses in the surrounding area. As shown in Draft EIR Table 2-2 (page 2-2), the Project site and surrounding area has a land use and zoning designation of Economic Development Corridor-Northen Gateway (EDC-NG), respectively. The ECD-NG designation allows for the development of industrial uses, and therefore the proposed industrial uses are permitted within the site and surrounding area. Regarding the Project's impacts to the residential land uses located in the City of Perris, the Project will comply with the City's Industrial Good Neighbor Policies which requires that warehouse, logistics, and distribution to minimize impacts to sensitive uses, protect of public health, safety, and welfare by regulating the design, location and operation of facilities; and protect neighborhood character of adjacent communities. As further discussed in Draft EIR Section 4.2, Air Quality, the Project's localized emissions during construction and operational

activity would be less than significant without implementation of mitigation measures (pages 4.2-26 through 4.2-28). Additionally, CO hotspots would not be experienced at any vicinity intersections resulting from 681 additional vehicle trips attributable to the Project and less than significant impacts were determined. As shown in Draft EIR Table 4.2-13, the Project' HRA determined that with implementation of MM GHG-2, impacts concerning carcinogenic risk from Diesel Particulate Matter would be reduced below SCAQMD's maximum cancer risk threshold (pages 4.3-33 and 4.2-34). Lastly, as discussed in the Draft EIR at page 4.7-25, Ethanac Road is designated as an expressway in the City of Menifee's General Plan. As such, trucks utilizing Ethanac Road for access is appropriate.

The commenter also states that it is inappropriate for the Draft EIR to study using Evans Rd., which routes trucks further along Ethanac Road, and that only Barnett Road should be utilized instead. Ethanac Road is currently designated as a truck route. The Project site is not situated such that Barnett Road alone provides sufficient access, and there is not an existing truck route south of the Project site that can also be used to provide access. Accordingly, it was appropriate for the Project Traffic Study to utilize Ethanac to Evans to access the site. It is also considered a conservative, worst-case scenario because the Draft EIR thus analyzed air quality and transportation impacts on the residences north of Ethanac Road, and air quality and transportation impacts were found to be less than significant with mitigation incorporation, and less than significant, respectfully. A global Traffic Study for the Menifee Economic Development Corridor (MEDC) area, including the addition of a truck corridor south of Ethanac Road, is currently being prepared in coordination with the City of Menifee and the City of Perris. However, that global study has not been completed, and therefore it was not appropriate for the Draft EIR to utilize and speculate about alternative truck routes that might later be designated.

A5-13 Ethanac Road is currently a truck route and is generally a straight and flat road, with good visibility, no visual obstructions, and no sharp curves. As noted in the Project Traffic Study, truck access provided to the Project site would consist of one full-movement truck-accessible driveway on Evans Road and one full-movement truck-accessible driveway on Barnett Road. The implementation of improvements is based on direct discussion between City staff and the Applicant via the Conditions of Approval process. Any improvements to portions of intersections or roadways shared with the City of Perris would be coordinated between the City of Menifee and City of Perris prior to final engineering for the Project. The recommended improvements noted in the Project Traffic Study will further improve safety conditions in the study area and would not create hazards due to geometric design features.

A HRA was prepared for the Project and as identified in Table 4.2-13: Carcinogenic Risk Assessment of the Draft EIR, the maximum cancer risk with mitigation is 1.73 in one million which is below SCAQMD's threshold of 10 in one million. In addition, cumulative short-term and long-term impacts were analyzed on pages 4.2-36 and 4.2-37 of the Draft EIR and it was determined that the Project would not result in a cumulatively considerable contribution to significant cumulative air quality impacts.

A5-14 Ethanac Road is currently designated as a truck route, and therefore it was appropriate for the Project Traffic Study to utilize Ethanac to access the site. It is also considered a conservative, worst-case scenario because the Draft EIR thus analyzed air quality and transportation impacts on the residences north of Ethanac Road, and air quality and transportation impacts were found to be less than significant with mitigation incorporation, and less than significant, respectfully. Further, the Project Traffic Study also analyzes both Project-specific and cumulative impacts with the inclusion of Cumulative Project traffic in the surrounding area. Therefore, the Project Traffic Study, as requested by the commenter, includes an area-wide analysis. Accordingly, the Draft EIR's transportation analysis was supported by substantial evidence. As noted in Response to Comment A5-12, a global Traffic Study for the Menifee Economic Development Corridor (MEDC) area and surrounding area, including the possible addition of a truck corridor south of Ethanac Road, is currently being prepared in coordination with the City of Menifee and the City of Perris. However, that global study has not been completed, and therefore it was not appropriate for the Draft EIR to utilize and speculate about alternative truck routes that might later be designated.

A5-15 Under CEQA Guidelines Section 15064.3, LOS associated with automobile delay no longer constitutes a significant environmental impact, and therefore this comment does not raise concerns within the scope of CEQA. The analysis included in the Draft EIR concerning LOS was provided for informational purposes only for the City's use in evaluating the Project and considering conditions of approval outside of CEQA's framework. Notwithstanding that this comment raises issues outside the scope of CEQA, the following response is provided.

Based on the City of Perris LOS Standards and Traffic Criteria for Traffic Studies (not dated), below are the current City of Perris LOS standards and criteria:

Level of Service Standards

The City of Perris has established the following standards regarding minimum acceptable level of service (LOS):

- LOS "D" along all City maintained roads (including intersections) and LOS "D" along I-215 and SR-74 (including intersections with local streets and roads). An exception to the local road standard is LOS "E", at intersections of any Arterials and Expressways with SR-74, the Ramona-Cajalco Expressway, or at I-215 freeway ramps.
- LOS "E" may be allowed within the boundaries of the Downtown Specific Plan Area to the extent that it would support transit-oriented development and walkable communities. Increased congestion in this area will facilitate an increase in transit ridership and encourage development of a complementary mix of land uses within a comfortable walking distance from light rail stations.

Thresholds of a Traffic Impact

A project would be considered to have a project-related effect based on the following criteria:

- A project-related traffic effect is considered direct when a study intersection operates at an acceptable Level of Service for existing conditions (without the project) and the addition of 50 or more AM or PM peak hour project trips causes the intersection delay to increase by 2 seconds or more and causes the intersection to operate at an unacceptable Level of Service for existing plus project conditions.
- A project-related traffic effect is considered direct when a study intersection operates at an unacceptable Level of Service for existing conditions (without the project) and the addition of 50 or more AM or PM peak hour project trips causes the intersection delay to increase by 2 seconds or more.
- A cumulative effect is considered direct when a study intersection is forecast to operate at an acceptable Level of Service without the project and with the addition of 50 or more AM or PM peak hour project trips causes the intersection delay to increase by 2 seconds or more and causes the intersection to operate at an unacceptable Level of Service.
- A cumulative effect is considered an indirect traffic effect when a study intersection is forecast to operate at an unacceptable Level of Service with the addition of cumulative/background traffic and the project contributes 50 or more AM or PM peak hour project trips and causes the intersection delay to increase by 2 seconds or more.

Based on review of the study intersections, below are study intersections located within Caltrans right-of-way (ROW) or located entirely or a majority within the City of Perris:

2. Barnett Road/Case Road at Ethanac Road (City of Perris)
3. I-215 SB Ramps at Ethanac Road (Caltrans)
4. I-215 NB Ramps at Ethanac Road (Caltrans)

Based on review of the City of Perris significance criteria and applicable intersections located within or adjacent to the City of Perris, the recommended improvements noted in the Project Traffic Study at deficient study intersections and roadway segments would cause the study locations to operate at an acceptable Level of Service (LOS), would more than offset the Project-related effect, and would address the City of Perris significance criteria. The Project Traffic Study notes that all study intersections operate at an acceptable LOS under Existing Plus Project conditions. Therefore, the Project would not cause a direct effect at the study intersections and would not be responsible for constructing recommended improvements.

Any improvements to portions of intersections or roadways shared with the City of Perris would be coordinated between the City of Menifee and City of Perris prior to final engineering for the Project.

A5-16 Detailed truck trip distribution figures are provided in Appendix D of the Traffic Study. As noted in the Project Traffic Study, truck access provided to the Project site would consist of one full-movement truck-accessible driveway on Evans Road and one full-movement truck-accessible driveway on Barnett Road. The Project Traffic Study analyzes a majority of trucks (60%) utilizing Ethanac Road via Evans Road and 40% of trucks using Ethanac Road via Barnett Road.

A5-17 See Response to Comment A5-12.

A5-18 See Response to Comment A5-15.

A5-19 See Response to Comment A5-15.

A5-20 The site plan being referenced in **Exhibit 2-7**which contained the term "Future Road" has been revised as "Future Private Driveway." Refer to **Section 3.0, Errata to the FEIR** for the revised exhibit. This is a future private driveway that would be developed by the Applicant as part of the Project to allow automobiles and trucks to enter Building 1 from Evans Road. Therefore, inclusion of the future driveway was considered as part of the Project's circulation design. The development of this future private driveway would not affect circulation or distribution of passenger vehicles and trucks on surrounding roadways. Therefore, no additional analysis is needed.

A5-21 The study locations on pages 4 and 5 of the Project Traffic Study have been updated accordingly. See Response to Comment A5-15 regarding City of Perris impact criteria.

A5-22 A separate signalized intersection typically has its own traffic signal cabinet, which is located on a corner of the intersection to which the signal cabinet is connected to. The traffic signal cabinet assigns phasing, signal timing, and cycle length that direct the operation of the individual traffic signal. In the case of the intersection of Ethanac Road at Barnett Road/Case Road, there is only one traffic signal cabinet located south of Ethanac Road between the two offset legs of the intersection. As such, while the northbound and southbound approaches are offset, the intersection operates as one signalized intersection that has connected phasing, signal timing, and cycle length. As a result, the intersection of Barnett Road/Case Road at Ethanac Road operates as one intersection and should be analyzed as one for analysis purposes.

Ethanac Road is generally a straight and flat road, with good visibility, no visual obstructions, and no sharp curves. Based on the Project Traffic Study, the intersection of Ethanac Road at Barnett Road/Case Road does not decline to an unacceptable LOS with the addition of Project traffic. A separate queuing analysis was conducted in the Project Traffic Study, which included the westbound left-turn pocket at the intersection of Ethanac Road at Barnett Road/Case Road. The queuing analysis noted that the 95th percentile queue for the westbound left-turn pocket at the noted intersection would exceed the queuing capacity of the existing left-turn pocket under Opening Year 2025 Cumulative and Opening Year 2025 Cumulative Plus Project conditions. Based on the queuing analysis, it is recommended in the Project Traffic Study for the westbound left-turn pocket at the intersection of Ethanac Road and Barnett Road/Case Road be extended to 250 feet. It should be noted that the existing left-turn pocket would have adequate capacity for the

95th percentile queue under Existing Plus Project conditions. As such, the project would not have a direct effect on the westbound left-turn pocket.

It should be noted that queuing progression and congestion does not automatically mean there is a safety hazard. As such, for the reasons noted above in this response, there is no evidence that those occurrences will create safety hazards in this case and the City of Perris has not provided any evidence to the contrary.

A5-23 See Response to Comment A5-15.

A5-24 See Response to Comment A5-22.

A5-25 Detailed turning movement percentages at each study intersection for both passenger car and truck Project trips is provided in Appendix D of the Project Traffic Study. Further, as noted in the Project Traffic Study, truck access provided to the Project site would consist of one full-movement truck-accessible driveway on Evans Road and one full-movement truck-accessible driveway on Barnett Road. The Project Traffic Study analyzes a majority of trucks (60%) utilizing Ethanac Road via Evans Road and 40% of trucks using Ethanac Road via Barnett Road. Accordingly, the Project Traffic Study clearly sets forth how Project traffic enters/exits the Project site.

A5-26 See Response to Comment A5-15.

A5-27 The Traffic Scoping Agreement included a list of Cumulative Projects (including development projects within the City of Perris). The City of Perris provided a NOP Comment dated July 20, 2023, which include comments regarding Transportation, but did not provide comments with regards to Cumulative Projects within the City of Perris to be included as part of the Traffic Study.

A5-28 Under CEQA Guidelines Section 15064.3, LOS associated with automobile delay no longer constitutes a significant environmental impact, and therefore this comment does not raise concerns within the scope of CEQA. The analysis included in the Draft EIR concerning LOS was provided for informational purposes only for the City's use in evaluating the Project and considering conditions of approval outside of CEQA's framework. Notwithstanding that this comment raises issues outside the scope of CEQA, the following response is provided.

The intersection of Barnett Road/Case Road at Ethanac Road operates as one intersection and should be analyzed as one for analysis purposes. The "right turn on red" volume in the traffic model for the study intersection was zero (0) on all approaches as a worst-case scenario. Based on the Project Traffic Study, the intersection would operate at an acceptable Level of Service with the addition of Project traffic. Therefore, no recommended improvements are required for the Project.

A5-29 Refer to Response to Comment A5-22. No further response is warranted.

A5-30 Under CEQA Guidelines Section 15064.3, automobile delay no longer is considered an environmental impact, and therefore this comment does not raise concerns within the scope of CEQA. The analysis included in the Draft EIR concerning LOS was provided for informational purposes only for the City's use in evaluating the Project and considering conditions of approval

outside of CEQA's framework. Notwithstanding that this comment raises issues outside the scope of CEQA, the following response is provided.

The Project Traffic Study only provides recommended improvements to study intersections and roadway segments that would cause the deficient study locations to operate at an acceptable Level of Service (LOS) and would more than offset the Project-related effect. The implementation of improvements is based on direct discussion between City staff and the Applicant via the Conditions of Approval process. Any improvements to portions of intersections or roadways shared with the City of Perris would be coordinated between the City of Menifee and City of Perris prior to final engineering for the Project. The developer/property owner shall pay fair share costs for off-site improvements as detailed in the Project Traffic Study prior to issuance of a certificate of occupancy.

A5-31 Refer to Response to Comment A5-22. No further response is warranted.

A5-32 Ethanac Road is generally a straight and flat road, with good visibility, no visual obstructions, and no sharp curves. It should be noted that queuing progression and congestion does not automatically mean there is a safety hazard. As such, there is no evidence that those occurrences will create safety hazards in this case and the City of Perris has not provided any evidence to the contrary.

The Project will be contributing a fair-share payment per Condition of Approval #135. It should be noted that the Ethanac Road/I-215 interchange has been identified as a Western Riverside Council of Governments (WRCOG) Transportation Uniform Mitigation Fee (TUMF) project. Therefore, the Project's payment of TUMF fees will cover additional costs to TUMF projects, such as the Ethanac Road/I-215 interchange. Nevertheless, the recommended improvements to deficient study locations are to address automobile delay, which are no longer CEQA impacts and therefore, not required improvements to mitigate CEQA-related impacts.

A5-33 Under CEQA Guidelines Section 15064.3, LOS associated with automobile delay no longer constitutes a significant environmental impact, and therefore this comment does not raise concerns within the scope of CEQA. The analysis included in the Draft EIR concerning LOS was provided for informational purposes only for the City's use in evaluating the Project and considering conditions of approval outside of CEQA's framework. Notwithstanding that this comment raises issues outside the scope of CEQA, the following response is provided.

Implementation of dual left-turn lanes would require two receiving lanes for the left turns exiting the intersection, which may not be feasible for all applicable roadways, consistent with the City of Menifee General Plan Circulation Element.

A5-34 Under CEQA Guidelines Section 15064.3, automobile delay no longer is considered an environmental impact, and therefore this comment does not raise concerns within the scope of CEQA. The analysis included in the Draft EIR concerning LOS was provided for informational purposes only for the City's use in evaluating the Project and considering conditions of approval

outside of CEQA's framework. Notwithstanding that this comment raises issues outside the scope of CEQA, the following response is provided.

A5-35 Under CEQA Guidelines Section 15064.3, automobile delay no longer is considered an environmental impact, and therefore this comment does not raise concerns within the scope of CEQA. The analysis included in the Draft EIR concerning LOS was provided for informational purposes only for the City's use in evaluating the Project and considering conditions of approval outside of CEQA's framework. Notwithstanding that this comment raises issues outside the scope of CEQA, the following response is provided. The Project will construct the ultimate half-width cross-section of Evans Road and Barnett Road along the project frontage, consistent with City of Menifee Road Improvement Standards and Specifications (Design Standards, 2019). Also, site access, including curb radii, driveway width, and truck turn design, will be designed consistent with City Design Standards to provide adequate maneuvering and queuing space for trucks/trailers on-site, as well as at the intersection of project driveways and adjacent streets. A copy of the project site plan with applicable truck-turning templates is provided as an attachment to this FEIR. As shown in the truck-turning templates, driveways, truck turning would be sufficient at a 45-foot radius and the Project is subject to the following condition:

Condition #115. Driveways - Final driveway geometrics may be modified in final engineering as approved by the Public Works Director / City Engineer. Driveways shall meet current standard radii on all existing and proposed commercial drive approaches used as access to the proposed development. The developer shall adhere to all City standards and regulations for access and ADA guidelines. As outlined in the following conditions, medians may be required to restrict turning movements for public safety purposes as determined by the Public Works Director / City Engineer.

As noted in discussion in page 4.13-19 of the Draft EIR, in compliance with Riverside County Fire Department (RCFD) access requirement, adequate emergency access would be provided by the Project. It should be noted that the roadways serving the project site are generally straight and flat. The project driveways have been designed so that adequate sight distance for drivers entering and exiting the site is maintained. Based on the items noted in this response and Section 4.13.5 of the Draft EIR, the Project would improve sight distance and safety conditions in the area and would not create hazards due to geometric design features.

A5-36 The City has noted that the Commenter could potentially provide additional comments on the environmental topics analyzed in the Draft EIR. The City has provided responses to the comments made in this letter submitted during the public review period pursuant to CEQA Guidelines Section 21091. Any additional comment letters submitted after the close of the public review period would be noted, but please note that responses to any late comment letters are not required under CEQA. Additionally, the City will provide all future notices of the Project to the Commenter. No further response is warranted.

A5-37 This comment includes conclusionary statements and therefore, no further response is warranted.

Comment Letter O1 - Radical Research, LLC

Mike McCarthy, Ph.D.

Comment Letter - O1

From: Michael McCarthy <MikeM@radicalresearch.llc>
Sent: Tuesday, June 18, 2024 2:55 PM
To: Brandon Cleary <bcleary@cityofmenifee.us>
Subject: RE: project details on this CEQA documentation

You don't often get email from mikem@radicalresearch.llc. Learn why this is important

[CAUTION]: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Brandon,

That does clarify it, kinda, but it is filed under the same State Clearinghouse Number and should be the same project. There might be some legal issues with filing this improperly, especially for noticing and tracking of the project.

Does the other project still exist under a different SCH? I'm not seeing any other Northern Gateway projects that still have the commerce center parcel next door.

1

Mike

From: Brandon Cleary <bcleary@cityofmenifee.us>
Sent: Tuesday, June 18, 2024 2:50 PM
To: Michael McCarthy <MikeM@radicalresearch.llc>
Subject: RE: project details on this CEQA documentation

Good afternoon Michael,

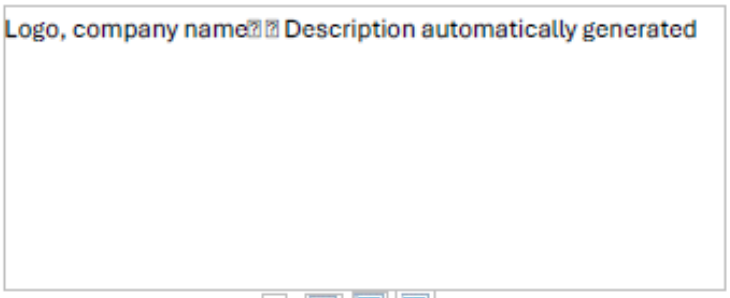
The first two on the link that you provided was for the Northern Gateway Logistic Center which is currently out for public review. This project is separate (different owners and parcels) and not associated with the Northern Gateway Commerce Center. Looks like the Northern Gateway Commerce Center which are the older two posts on the list (2021 and 2022 posting dates) are across the street to the west.

Hope this helps clarify the confusion but let me know if it doesn't.

2

Thanks!

Brandon Cleary | Associate Planner
Community Development Department – Planning Division
"Creating a HEALTHY, VIBRANT, and CONNECTED community for everyone."
City of Menifee | 29844 Haun Road | Menifee, CA 92586
City Hall: (951) 672-6777 | Direct: (951) 723-3761
bcleary@cityofmenifee.us | cityofmenifee.us



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From: Michael McCarthy <MikeM@radicalresearch.llc>
Sent: Tuesday, June 18, 2024 2:42 PM
To: Brandon Cleary <bcleary@cityofmenifee.us>
Subject: project details on this CEQA documentation

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Brandon,

Hope all is well with you.

I track warehouses and am confused by the details on the linked project – the Northern Gateway _____ Project
https://ceqanet.opr.ca.gov/Project/2021110379

3

It has changed names and parcels multiple times in its history, and even changed project applicants. I am very confused how this is all under the same project SCH number. Is the current EIR for the Northern Gateway Logistics Center a continuation of the previous projects under 2021110379?

4

Thanks!

Mike McCarthy, PhD
http://radicalresearch.llc
Riverside, CA 92508

Response to Comment Letter O1 - Radical Research, LLC
Mike McCarthy, Ph.D.

O1-1 Refer to the Response to Comment below O1-2.

O1-2 As stated in the response to the commenter, the link provided by the commenter showed this Project and the "Northern Gateway Commerce Center" project proposed west of Evans Road. Both projects have different APNs and project applicants.

O1-3 This comment includes an introduction and general concern of the Project. No further response is warranted.

O1-4 Refer to Response to Comment O1-2 for explanation of the commenter's concern on the Project name, applicant, and state clearing house number issue.

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Comment Letter O2 - SAFER, c/o Lozeau Drury, LLP

Kylah Staley

Comment Letter - O2

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Via Email

July 1, 2024

Brandon Cleary, Associate Planner
Planning Division
Community Development Department
City of Menifee
28944 Haun Road
Menifee, CA 92586
bcleary@cityofmenifee.us

Re: Comment on Draft Environmental Impact Report, Northern Gateway Logistics Center Project (SCH 2021110379)

Dear Mr. Cleary:

This comment is submitted on behalf of Supporters Alliance for Environmental Responsibility ("SAFER") regarding the Draft Environmental Impact Report ("DEIR") prepared for the Northern Gateway Logistics Center Project (SCH 2021110379), which proposes the development of two industrial warehouses, one consisting of 105,537 square feet and the other consisting of 292,715 square feet, located south of Ethanac Road, north of a SCE easement with McLaughlin Road on the south, east of Evans Road, and west of Barnett Road in the City of Menifee ("Project"). 1

SAFER is concerned that the DEIR fails as an informational document and fails to impose all feasible mitigation measures to reduce the Project's impacts. SAFER requests that the Community Development Department address these shortcomings in a revised draft environmental impact report ("RDEIR") and recirculate the RDEIR prior to considering approvals for the Project. 2

SAFER reserves the right to supplement these comments during the administrative process. *Galante Vineyards v. Monterey Peninsula Water Management Dist.*, 60 Cal. App. 4th 1109, 1121 (1997). 3

July 1, 2024
Comment on Draft Environmental Impact Report, Northern Gateway Logistics Center Project (SCH 2021110379)
Page 2 of 2

Sincerely,

Kylah Staley
Lozeau Drury LLP

Response to Comment Letter O2 - SAFER, c/o Lozeau Drury, LLP
Kylah Staley

O2-1 This comment includes introductory statements and a brief summary of the Project's description.

O2-2 The Commenter stated that the Draft EIR fails as an informational document and fails to impose all feasible mitigation measures to reduce the Project's impact without stating any specific alleged deficiencies with the Draft EIR or providing any evidence that supplements these claims. Therefore, no further response is warranted.

O2-3 The City has noted that the Commenter could potentially provide additional comments on the environmental topic analyzed in the Draft EIR. The City has provided responses to the comments made in this letter, submitted during the public review period, pursuant to CEQA Guidelines Section 21091. Any additional comment letters submitted after the close of the public review period would be noted, but please note that responses to any late comment letters are not required under CEQA.

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Comment Letter O3 - Golden State Environmental Justice Alliance, c/o Blum, Collins & Ho LLP

Gary Ho

Comment Letter - O3

BLUM, COLLINS & HO LLP
ATTORNEYS AT LAW
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707 WILSHIRE BOULEVARD
SUITE 4880
LOS ANGELES, CALIFORNIA 90017 (213) 572-0400

July 17, 2024

Brandon Cleary
City of Menifee
29844 Haun Road
Menifee, CA 92586

VIA EMAIL TO:
bcleary@cityofmenifee.us

SUBJECT: COMMENTS ON NORTHERN GATEWAY LOGISTICS CENTER (SCH NO. 2021110379)

Dear Mr. Cleary,

Thank you for the opportunity to comment on the Environmental Impact Report (EIR) for the proposed Northern Gateway Logistics Center Project. Please accept and consider these comments on behalf of Golden State Environmental Justice Alliance. Also, Golden State Environmental Justice Alliance formally requests to be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. Send all communications to Golden State Environmental Justice Alliance P.O. Box 79222 Corona, CA 92877. 1

1.0 Summary

The project proposes the construction and operation of two new concrete tilt up warehouse and distribution buildings totaling 398,252 square feet (sq. ft.) of total building area on an approximately 20.17 acre site. Building 1 is proposed to be 105,537 sq. ft. consisting of 6,000 sq. ft. of office space and 99,537 sq. ft. of warehouse space and is located on the north side of the site. Building 2 is on the southern end of the site and is proposed to be 292,715 sq. ft. consisting of 8,000 sq. ft of office space, 7,000 sq. ft. of mezzanine, and 277,715 sq. ft. of warehouse area. Building 1 includes 15 truck/trailer loading dock doors and Building 2 includes 37 truck/trailer loading dock doors. 2

2.0 Project Description

The EIR does not include a floor plan, detailed elevations, or a conceptual grading plan for any of the project sites. The basic components of a Planning Application include a detailed site plan, 3

floor plan, conceptual grading plan, written narrative, and detailed elevations. For example, the elevations provided in Exhibit 2-9 and Exhibit 2-10 do not include the paint colors or building materials. The site plans provided in Exhibit 2-6 and Exhibit 2-7 have been edited to remove pertinent information from public review including the legend and key notes. Further, the Project Description states that off-site improvements include "relocation of an underground flood channel," but the EIR does not provide any specific information regarding this aspect of the project, which would typically be described in a Project Narrative and associated plans that must be included as part of a revised EIR.

cont'd 3

4

The EIR has also excluded a grading plan from public review. The EIR states that, "the Project would require approximately 34,865 Cubic Yards (CYs) of soil cut and 33,346 CYs soil fill resulting in approximately 1,519 CYs of export to balance the site," yet there is no method for the public to verify this claim. Providing the grading plan and earthwork quantity notes is vital as this directly informs the quantity of necessary truck hauling trips due to soil import/export during the grading phase of construction. Additionally, the Project Description states that off-site improvements include "relocation of an underground flood channel," which will likely require additional cut/fill and earthwork movement due to its underground nature, and the EIR has not indicated that this is included in the earthwork quantities provided. A revised EIR must be prepared to include wholly accurate and unedited detailed floor plan, grading plan, site plan, elevations, and project narrative for public review.

5

6

The Project Description also provides a list of off-site improvements required to operate the proposed project. However, the list is not adequate as it does not provide sufficient details or state the extent the off-site improvements. For example, the entirety of Evans Road from Ethanac Road to McLaughlin Road is currently unimproved (unpaved dirt) and will need to be constructed in order to serve the proposed project. Further, the Site Plan depicts that a new street will need to be constructed to serve the south side of the project site and is referred to as "A Street" within the EIR, but construction of "A Street" is excluded from the list of off-site improvements. Additionally, elsewhere within the Project Description it is stated that off-site improvements include "relocation of an underground flood channel." However, this is also excluded from the list of off-site improvements, and the EIR does not provide any specific information regarding the relocation of an underground flood channel. The EIR must be revised to state the complete extent of off-site improvements required to implement the proposed project and also include a figure

7

8

depicting the off-site improvements in order to provide an adequate informational document and comply with CEQA's requirements for meaningful disclosure (CEQA § 15121 and 21003(b)).

cont'd 8

4.2 Air Quality, 4.5 Energy, and 4.7 Greenhouse Gas Emissions

Please refer to an attachment from SWAPE for a full technical commentary and analysis.

9

The EIR does not include for analysis relevant environmental justice issues in reviewing potential impacts, including cumulative impacts from the proposed project. According to CalEnviroScreen 4.0[1], CalEPA's screening tool that ranks each census tract in the state for pollution and socioeconomic vulnerability, the proposed project's census tract (6065042731) is highly burdened by pollution. The surrounding community, including existing residences adjacent to the north (share property line with the proposed project) on Floyd Avenue, bears the impact of multiple sources of pollution and is more polluted than average on several pollution indicator measured by CalEnviroScreen. For example, the project census tract ranks in the 91st percentile for ozone burden, the 51st percentile for particulate matter (PM) 2.5 burden, and 74th percentile for traffic burden. These environmental factors are attributed to heavy truck activity in the area. Ozone can cause lung irritation, inflammation, and worsening of existing chronic health conditions, even at low levels of exposure[2]. Exhaust fumes contain toxic chemicals that can damage DNA, cause cancer, make breathing difficult, and cause low weight and premature births[3].

10

[1] https://experience.arcgis.com/experience/11d2f52282a54ceebcac7428e6184203/page/CalEnviroScreen-4_0/
[2] OEHHA Ozone https://oehha.ca.gov/calenviroscreen/indicator/air-quality-ozone
[3] OEHHA Traffic https://oehha.ca.gov/calenviroscreen/indicator/traffic-density

Further, the census tract is a diverse community including 60% Hispanic, 6% African-American, and 2% Asian-American residents, whom are especially vulnerable to the impacts of pollution. The community has a high rate of low educational attainment, meaning 79% of the census tract residents over age 25 has not attained a high school diploma. The community also has a high rate of poverty, meaning 47% of the households in the census tract have a total income before taxes that is less than the poverty level. Income can affect health when people cannot afford healthy living and working conditions, nutritious food and necessary medical care[4]. Poor communities are often located in areas with high levels of pollution[5]. Poverty can cause stress that weakens the immune system and causes people to become ill from pollution[6]. Living in poverty is also an indication that residents may lack health insurance or access to medical care. Medical care is vital for this census tract as it ranks in the 78th percentile for incidence of cardiovascular disease and 49th percentile for incidence of asthma. 11

Additionally, the census tract adjacent to the project site (6065042901 (north)) is identified as an SB 535 Disadvantaged Community[7]. This indicates that cumulative impacts of development and environmental impacts in the immediate vicinity are disproportionately impacting this community. The negative environmental, health, and quality of life impacts resulting form a saturation of the warehousing and logistics industry in the community have become distinctly inequitable. A revised EIR must be prepared to include the specific analysis of each environmental impact on the Disadvantaged Community, including cumulative analysis and irreversible environmental effects. 12

The State of California lists three approved compliance modeling softwares[8] for non-residential buildings: CBECC-Com, EnergyPro, and IES VE. CalEEMod is not listed as an approved software. The CalEEMod modeling does not comply with the 2022 Building Energy Efficiency Standards and under-reports the project's significant Energy impacts and fuel consumption to the public and decision makers. Since the EIR 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 one of the approved software types must be prepared and 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 an approved software. 13 14

[4] OEHHA Poverty https://oehha.ca.gov/calenviroscreen/indicator/poverty
[5] Ibid.
[6] Ibid.
[7] OEHHA SB 535 Census Tracts https://oehha.ca.gov/calenviroscreen/sb535
[8] California Energy Commission 2022 Energy Code Compliance Software https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2022-building-energy-efficiency-1

Table 4.7-3: Project Greenhouse Gas Emissions demonstrates that the unmitigated project operations will generate 3,378 MTCO2e annually and implements Mitigation Measures GHG-1 and GHG-2 to allegedly mitigate these significant and unavoidable impacts: 15

"MM GHG-1 Prior to the issuance of a building permit or tenant occupancy permits, the City of Menifee Building and Safety Division shall confirm that the Project does not include conveyance of natural gas utility lines. The purpose of this mitigation measure is to reduce GHG emissions from natural gas. 16

MM GHG-2 All outdoor cargo handling equipment (such as yard trucks, hostlers, yard goats, pallet jacks, and forklifts) shall be zero emission (i.e., powered by electricity or other alternative fuels). The warehouse buildings shall include the necessary charging stations for cargo handling equipment. The building manager or their designee shall be responsible for enforcing these requirements." 17

Notably, the EIR has not provided meaningful evidence or analysis to support the conclusion that Mitigation Measures GHG-1 and GHG-2 will reduce GHG emissions to less than significant levels. Mitigation Measures GHG-1 and GHG-2 are also unenforceable mitigation in violation of CEQA § 21081.6 (b). It is not possible for the lead agency to ensure that Mitigation Measures GHG-1 and GHG-2 will result in reduced GHG emissions (as specified in Table 4.7-3) and be implemented continuously, at all times, throughout the life of the project and maintain a GHG reduction to less than significant levels at all times. 18

Further, the EIR maintains throughout the document that, "The proposed warehouse uses are considered speculative in nature," meaning that the future tenants are unknown. Since the tenants are unknown, there is no possible assurance that MM GHG-2 will result in any quantified GHG emissions reduction as the type of work to be conducted is unknown. 19

The efficacy of the proposed mitigation measures and reduction of GHG impacts below the applicable thresholds cannot be assured, and the project's GHG impact is therefore considered significant and unavoidable. A revised EIR must be prepared to include a finding of significance because there is no possible assurance of the percentage of achievable GHG reduction associated with the mitigation measures and mitigation of the project's GHG impact to less than significant is not feasible. 20

4.8 Hazards and Hazardous Materials

The EIR does not disclose that the project site (APN 331-060-020) is within Compatibility Zone E of the Perris Valley Airport ALUCP[9]. The EIR must be revised to include this for analysis in order to provide an adequate informational document. The EIR states that, "the entire Project site is located within Compatibility Zone E of the March Air Reserve Base." 21

The EIR concludes that the project will have less than significant impacts because, "All new development would be in accordance with the Compatibility Zone E and all state, county, and local goals, policies, and regulations." The EIR does not provide any analysis or information regarding regulations and requirements within influence area Zone E of the Perris Valley Airport or Zone E of the March Air Reserve Base. The EIR has not provided any meaningful evidence to support its claims of consistency and a finding of significance must be made in a revised EIR. 22

4.10 Land Use and Planning

The EIR does not meaningfully discuss or analyze the project's compliance with the General Plan's Land Use Buildout Scenario. Exhibit LU-4: Land Use Buildout Summary within the General Plan Land Use Element[10] analyzes a 0.40 FAR for Industrial development within EDC-NG and 25,020,987 square feet of non-retail development within all EDC areas. The project site as a FAR of 0.453, which is greater than the assumption of the environmental analysis which it attempts to tier from. The proposed project would increase the maximum allowable non-retail development within the EDC and the EIR has not provided any information or analysis on this topic. The EIR has not provided evidence that the growth generated by the proposed project was anticipated by the General Plan, RTP/SCS, or AQMP. The EIR must be revised to provide an accurate build-out scenario of the City's General Plan, including analysis of the proposed project's increase in building area of non-retail development. 23

Table 4.10-3: Project Compatibility with SCAG's Connect SoCal Strategies concludes that the project is consistent with the goals of Connect SoCal, resulting in less than significant impacts. 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 24

[9] https://rcaluc.org/sites/g/files/aldnop421/files/migrated/Portals-13-19-20--20Vol.-201-20Perris-20Valley-20-Final-Mar.2011-.pdf
[10] Menifee General Plan Land Use Element
https://www.cityofmenifee.us/DocumentCenter/View/14701/FINAL_Land-Use-Element_11322

communities, and Goal 7 to adapt to a changing climate. The EIR must be revised to include finding of significance due to inconsistency with the RTP/SCS. cont'd 24

The EIR does not provide a consistency analysis with all land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. Further, Table 4.10-4: Consistency with the City of Menifee General Plan includes consistency analysis that is erroneous and misleading to the public and decision makers. The EIR is inadequate as an informational document and a revised EIR must be prepared with a consistency analysis with all General Plan policies, including but not limited to the following: 25

1. Goal S-7: A community that has protected its sensitive structures, functions, and populations from the risks associated with climate change.
2. Policy S-7.1: Continue to require environmental analysis for proposed projects which may produce harmful levels of greenhouse gas.
3. Policy EJ-3.6: Continue to collaborate with the South Coast Air Quality Management District (SCAQMD), California Air Resources Board (CARB), utility providers, Southern California Association of Governments (SCAG), Western Riverside Council of Governments (WRCOG) and nonprofit organizations, neighborhoods groups, and other community organizations to improve air quality, food availability, renewable energy systems, sustainable land use and reduce greenhouse gas emissions (GHGs).
4. Policy C-5.3: Support efforts to reduce/eliminate the negative environmental impacts of goods movement.
5. Goal OSC-10: An environmentally aware community that is responsive to changing climate conditions and actively seeks to reduce local greenhouse gas emissions.
6. Policy OCS-10.1: Align the city's local GHG reduction targets to be consistent with the statewide GHG reduction target of AB 32.
7. Policy OCS-10.2: Align the city's long-term GHG reduction goal consistent with the statewide GHG reduction goal of Executive Order S-03-05.
8. Policy OCS-10.3: Participate in regional greenhouse gas emission reduction initiatives.
9. Policy OCS-10.4: Consider impacts to climate change as a factor in evaluation of policies, strategies, and projects
10. Policy C-5.3: Support efforts to reduce/eliminate the negative environmental impacts of goods movement.

Table 4.13-2: Summary of Intersection Operation; Recommended Improvements and Table 4.13-3: Summary of Roadway Segment Analysis with Recommended Improvements conclude the following intersections and roadway segments require improvements to address the deficiencies per the applicable thresholds:

1. Intersection #1: Evans Road at Ethanac Road
2. Intersection #3: I-215 SB Ramps at Ethanac Road
3. Intersection #4: I-215 NB Ramps at Ethanac Road
4. Ethanac Road Segment: Evans Road to Case Road
5. Ethanac Road Segment: Case Road to I-215 SB Ramps
6. Ethanac Road Segment: I-215 SB Ramps to I-215 NB Ramps

26

Table 4.13-4: Project Fair Share Contributions provides a list of fair-share calculations for improvements that will allegedly mitigate significant and unavoidable impacts to the intersections/roadway segments to less than significant levels. It must be noted that the impacts to the intersections and roadway segments are located in the City of Perris, and the I-215 is a Caltrans facility. For example, the north side of Ethanac Road is under jurisdiction of Perris (Intersections #1, #3, and #4), and once Ethanac Road reaches Barnett, the entirety of Ethanac Road is under jurisdiction of Perris (Intersection #4 and above listed road segments). Any improvements planned/constructed or in-lieu fees/fair share fees paid for City of Perris or Caltrans facilities are beyond the control/scope of the lead agency. An assessment of fees is appropriate when linked to a specific mitigation program. (*Anderson First Coalition v. City of Anderson* (2005) 130 Cal.App.4th 1173, *Save our Peninsula Comm. v. Monterey County Bd. Of Supers*. (2001) 87 Cal.App.4th 99, 141.) Payment of fees is not sufficient where there is no evidence mitigation will actually result. (*Gray v. County of Madera* (2008) 167 Cal.App.4th 1099,1122.) The assessment of fees here is not adequate as there is no evidence mitigation will actually result. The improvements associated with the fair-share fees are not planned to occur at all or by any certain date, whether by the City of Perris or Caltrans. Any improvements recommended or fees paid to mitigate impacts for City of Perris or Caltrans facilities are beyond the control of the lead agency and evidence that these improvements will be completed or approved by Perris or Caltrans has not been provided. A revised EIR must be prepared to include the LOS analysis as cumulatively considerable significant impact as the project conflicts with Transportation Impact Threshold 4.13-1 and Land Use and Planning Impact Threshold 4.10-2 because it is not consistent with the following General Plan Policy:

1. Policy C-1.2: Require development to mitigate its traffic impacts and achieve a peak hour Level of Service (LOS) D or better at intersections, except at constrained intersections at close proximity to the I-215 where LOS E may be permitted.

27

4.13 Transportation

Table 4.13-2: Summary of Intersection Operation; Recommended Improvements and Table 4.13-3: Summary of Roadway Segment Analysis with Recommended Improvements conclude the following intersections and roadway segments require improvements to address the deficiencies per the applicable thresholds:

1. Intersection #1: Evans Road at Ethanac Road
2. Intersection #3: I-215 SB Ramps at Ethanac Road
3. Intersection #4: I-215 NB Ramps at Ethanac Road
4. Ethanac Road Segment: Evans Road to Case Road
5. Ethanac Road Segment: Case Road to I-215 SB Ramps
6. Ethanac Road Segment: I-215 SB Ramps to I-215 NB Ramps

28

Table 4.13-4: Project Fair Share Contributions provides a list of fair-share calculations for improvements that will allegedly mitigate significant and unavoidable impacts to the intersections/roadway segments to less than significant levels. It must be noted that the impacts to the intersections and roadway segments are located in the City of Perris, and the I-215 is a Caltrans facility. For example, the north side of Ethanac Road is under jurisdiction of Perris (Intersections #1, #3, and #4), and once Ethanac Road reaches Barnett, the entirety of Ethanac Road is under jurisdiction of Perris (Intersection #4 and above listed road segments). Any improvements planned/constructed or in-lieu fees/fair share fees paid for City of Perris or Caltrans facilities are beyond the control/scope of the lead agency. An assessment of fees is appropriate when linked to a specific mitigation program. (*Anderson First Coalition v. City of Anderson* (2005) 130 Cal.App.4th 1173, *Save our Peninsula Comm. v. Monterey County Bd. Of Supers.* (2001) 87 Cal.App.4th 99, 141.) Payment of fees is not sufficient where there is no evidence mitigation will actually result. (*Gray v. County of Madera* (2008) 167 Cal.App.4th 1099,1122.) The assessment of fees here is not adequate as there is no evidence mitigation will actually result. The improvements associated with the fair-share fees are not planned to occur at all or by any certain date, whether by the City of Perris or Caltrans. Any improvements recommended or fees paid to mitigate impacts for City of Perris or Caltrans facilities are beyond the control of the lead agency and evidence that these improvements will be completed or approved by Perris or Caltrans has not been provided. A revised EIR must be prepared to include the LOS analysis as cumulatively considerable significant impact as the project conflicts with Transportation Impact Threshold 4.13-1 and Land Use and Planning Impact Threshold 4.10-2 because it is not consistent with the following General Plan Policy:

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1. Policy C-1.2: Require development to mitigate its traffic impacts and achieve a peak hour Level of Service (LOS) D or better at intersections, except at constrained intersections at close proximity to the I-215 where LOS E may be permitted.

cont'd 29

The EIR has underreported the quantity VMT generated by the proposed project operations. The operational nature of industrial/warehouse uses involves high rates of truck/trailer/delivery van VMT due to traveling from large import hubs to regional distribution centers to smaller industrial parks and then to their final delivery destinations. Once employees arrive at work at the proposed project, they will conduct their jobs by driving delivery vans across the region as part of the daily operations as a warehouse, which will drastically increase project-generated VMT. The project's truck/trailer and delivery van activity is unable to utilize public transit or active transportation and it is misleading to the public and decision makers to exclude this activity from VMT analysis. The project's total operational VMT generated is further inconsistent with the significance threshold and legislative intent of SB 743 to reduce greenhouse gas emissions by reducing VMT. A revised EIR must be prepared to reflect a quantified VMT analysis that includes all truck/trailer and delivery van activity.

30

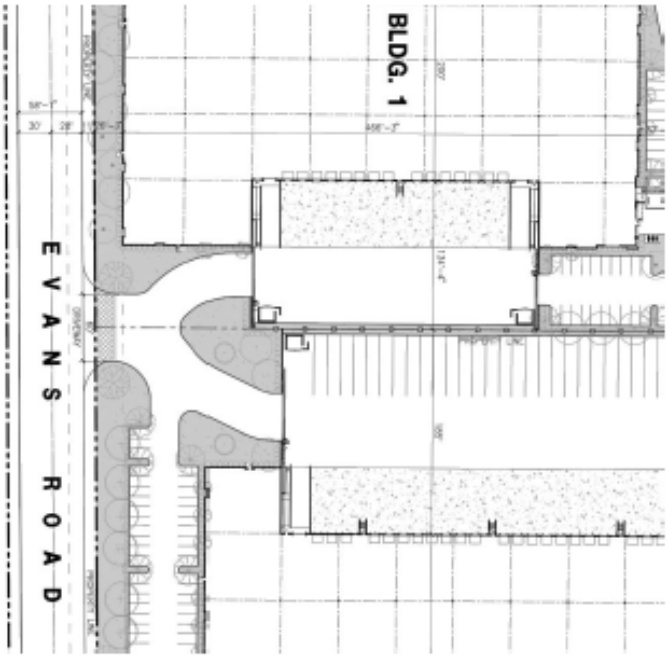
The EIR has not adequately analyzed the project's potential to substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses; or the project's potential to result in inadequate emergency access. There are no exhibits adequately depicting the available maneuvering and queueing space for trucks/trailers at the intersection of the project driveways and the adjacent streets. There are several potential areas for conflicts between trucks/trailers and passenger cars. For example, there is only one vehicle access point on Barnett Road and it will serve both passenger cars and trucks/trailers. There is no analysis regarding the available queuing and maneuvering space to accommodate both types of vehicles.

31

Additionally, the central driveway along Evans Road that provides truck/trailer and passenger car access to both buildings has not been analyzed for potential conflicts. The curved driveways provide access to the truck/trailer loading docks and converge with the driveway for a passenger car parking lot for Building 2. There is no modeling to demonstrate that these curved driveways provide adequate queueing and/or maneuvering space for trucks/trailers to access the site. There is no information or analysis regarding potential traffic control requirements (stop signs, etc) necessary to control the flow of traffic and eliminate conflicts between trucks/trailers and passenger cars. A revised EIR must be prepared to include truck turning templates overlaid on the

32

Site Plan for each building for review, analysis, and comment by the public and decision makers in order to provide an adequate and accurate environmental analysis.



cont'd 32

The EIR states that, "All circulation improvements would be constructed as approved by the City's Public Works Department. Additionally, the Project would be constructed in accordance with Menifee MC Section 9.160.050." The EIR also does not provide any exhibits depicting emergency vehicle access and makes a similar statement regarding emergency access in stating that, "the Menifee Fire Department (MFD), would review all new development plans, and future development is required to conform to all fire protection and prevention requirements, including, but not limited to, building setbacks, emergency access, and fire flow. Following compliance with MFD access requirements, adequate emergency access to the Project site would be provided." The EIR does not provide a list of requirements or demonstrate how the project complies with these Municipal Code Sections or MFD requirements. This does not comply with CEQA's requirements for adequate informational documents and meaningful disclosure (CEQA § 15121 and 21003(b)). Deferring this environmental analysis required by CEQA to the construction permitting phase is improper mitigation and does not comply with CEQA's requirement for meaningful disclosure and adequate informational documents. A revised EIR must be prepared to include exhibits with truck turning templates and emergency access analysis overlaid on the Site Plan for review,

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analysis, and comment by the public and decision makers in order to provide an adequate and accurate environmental analysis. cont'd 33

Additionally, the EIR has not provided any analysis of the available horizontal and vertical sight distance at the intersection of the project driveways and adjacent streets. Sight distance is the continuous length of street ahead visible to the driver. At unsignalized intersections, corner sight distance must provide a substantially clear line of sight between the driver of the vehicle waiting on the minor road (driveway) and the driver of an approaching vehicle. The EIR states that, "Sight distance at Project access points would comply with applicable sight distance standards and no sharp curves are proposed as part of the Project design." However, the EIR does not provide a list of requirements or demonstrate how the project complies with them. This does not comply with CEQA's requirements for adequate informational documents and meaningful disclosure (CEQA § 15121 and 21003(b)). Deferring this environmental analysis required by CEQA to the construction permitting phase is improper mitigation and does not comply with CEQA's requirement for meaningful disclosure and adequate informational documents. A revised EIR must be prepared with this analysis based on the American Association of State Highway and Transportation Officials (AASHTO) Stopping Sight Distance requirements. 34

5.2 Significant and Irreversible Environmental Changes, 5.3 Growth-Inducing Impacts, and 5.4 Mandatory Findings of Significance

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. The EIR must be revised to include a finding of significance due to the an inaccurate and erroneous analysis regarding the project's Air Quality, Greenhouse Gas, and Energy impacts, including those significant and unavoidable cumulatively considerable GHG impacts. 35

The EIR does not adequately discuss or and analyze the commitment of resources is not consistent with regional and local growth forecasts. As noted throughout this comment letter, the project represents a significant amount of building area growth in the City and a significant amount of the City's employment growth over 29 years. The EIR does not meaningfully discuss or analyze the project's compliance with the General Plan's Land Use Buildout Scenario. Exhibit LU-4: Land Use Buildout Summary within the General Plan Land Use Element[11] analyzes a 0.40 FAR for Industrial development within EDC-NG and 25,020,987 square feet of non-retail development 36

[11] Menifee General Plan Land Use Element
https://www.cityofmenifee.us/DocumentCenter/View/14701/FINAL_Land-Use-Element_11322

within all EDC areas. The project site as a FAR of 0.453, which is greater than the assumption of the environmental analysis which it attempts to tier from. The proposed project would increase the maximum allowable non-retail development within the EDC and the EIR has not provided any information or analysis on this topic. The EIR has not provided evidence that the growth generated by the proposed project was anticipated by the General Plan, RTP/SCS, or AQMP. The EIR must be revised to provide an accurate build-out scenario of the City's General Plan, including analysis of the proposed project's increase in building area of non-retail development.

cont'd 36

The EIR has not provided an adequate or accurate cumulative analysis discussion here to demonstrate the impact of the proposed project in a cumulative setting. SCAG's Connect SoCal Demographics and Growth Forecast[12] notes that the City will add 15,400 jobs between 2016 - 2045. Utilizing the SCAG Employment Density Study calculation of 694 employees, the project represents 4.5% of the City's employment growth from 2016 - 2045. A single project accounting for this amount of the projected employment growth over 29 years represents a significant amount of growth. A revised EIR must be prepared to include this analysis, and also provide a cumulative analysis discussion of projects approved since 2016 and projects "in the pipeline" to determine if the project will exceed SCAG's employment growth forecast for the City. For example, other recent industrial projects[13] such as Menifee Commerce Center (2,885 employees), Menifee Commerce Center Phase II (1,962 employees), Northern Gateway Commerce Center (2,267 employees), Ares Warehouse on Murrieta (952 employees), Capstone Industrial (1,205 employees), Wheat Warehouse (151 employees), Corsica Business Park (477 employees), Trumble and Watson Warehouse (571 employees), McLaughlin San Jacinto Warehouses (846 employees), Mapes and Sherman Warehouse (478 employees), United Carports Warehouse (105 employees), Motte Business Center (1,964 employees), Ethanac and Barnett Warehouse (440 employees), CADO Menifee (860 employees), Compass Northern Gateway (599 employees), and Ares Murrieta Road Warehouse (652 employees) combined with the proposed project will cumulatively generate 17,353 employees, which is 112% of the City's employment growth forecast over 29 years accounted for by 18 industrial projects submitted since 2020. This exceeds the projected growth forecast for the City. This number increases exponentially when the City's commercial development activity and other projects since 2016 (SCAG) and 2013 (General Plan)

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[12] SCAG Connect SoCal Demographics and Growth Forecast adopted September 3, 2020 https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf?1606001579

[13] Data for all listed projects via City of Menifee Land Development Projects Map https://cityofmenifee.maps.arcgis.com/apps/instant/minimalist/index.html?appid=55fc56d4eee94e588a28a958cebac908 and Accela Menifee https://aca-prod.accela.com/MENIFEE/Cap/CapHome.aspx?module=Planning&TabName=Planning&TabList=Home%7C0%7CPermits%7C1%7CEngineering%7C2%7CPlanning%7C3%7CFire%7C4%7CCurrentTabIndex%7C3

are added to the calculation. A revised EIR must be prepared to include a cumulative analysis on this topic in order to provide an adequate and accurate environmental analysis. cont'd 37

7.4 Effects Found Not to be Significant: Population and Housing

Construction of the Project would generate temporary employment opportunities, including short-term design, engineering, and construction jobs. Construction related jobs would not result in a significant population increase because those jobs are temporary in nature and are expected to be filled by persons within the local area. This expectation is based on the latest unemployment data for Riverside County6 (4.5 percent) and the City of Menifee7 (4.2 percent). 38

The EIR utilizes uncertain language and does not provide any meaningful analysis or supporting evidence to substantiate the conclusion that there will be no significant impact to population and housing. The EIR only discusses the construction related jobs and states that, "Construction related jobs would not result in a significant population increase because those jobs are temporary in nature and are expected to be filled by persons within *the local area*. This expectation is based on the latest unemployment data for Riverside County (4.5 percent) and the City of Menifee (4.2 percent)." Notably, the geographic boundaries of the "local area" are undefined and will result in the project attracting a workforce that is exponentially further in distance than the 22.0 VMT utilized in the EIR to conclude less than significant VMT impacts. 39

The EIR relies upon the unemployment rates for the entire Riverside County area to provide employees for the project, but does not provide evidence that the specific workforce listed is qualified for or interested in construction work to substantiate this claim. Relying on the unemployed workforce population of the surrounding region will increase project related VMT and emissions during all phases of construction and operations and a revised EIR must be prepared to account for longer worker trip distances. Additionally, an unemployment rate below 5% is considered full employment and does not substantiate the EIR's claims that impacts will be less than significant. 40

The EIR has not provided any quantified analysis here of the project's operational employment generation. SCAG's Employment Density Study[14] provides the following applicable employment generation rates for Riverside County: 41

Warehouse: 1 employee per 581 square feet
Office: 1 employee per 481 square feet

[14] SCAG Employment Density Study
http://www.mwcog.org/file.aspx?A=QTTlTR24POOOUIw5mPNzK8F4d8djdJe4LF9Exj6lXOU%3D

Applying these ratios results in the following calculation:
Warehouse: 377,252 sf / 581 sf = 650 employees
Office: 21,000 sf / 481 sf = 44 employees

Total: 694 employees

cont'd 41

Utilizing SCAG's Employment Density Study ratios, the proposed project will generate 694 employees. The MND utilizes uncertain and misleading language which does not provide any meaningful analysis of the project's population and employment generation. In order to comply with CEQA's requirements for meaningful disclosure, an EIR must be prepared to provide an accurate estimate of employees generated by all uses of the proposed project. It must also provide demographic and geographic information on the location of qualified workers to fill these positions.

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The EIR also states that, "the Project site is served by existing public roadways, and utility infrastructure would be installed beneath the public rights-of-way that abut the Project site." This statement is erroneous and misleading to the public and decision makers and must be removed and replaced with factual project components as part of a revised EIR. For example, the Site Plan depicts that a new street will need to be constructed to serve the south side of the project site and is referred to as "A Street" within the EIR. While the EIR is also deficient as it does not provide a figure depicting all off-site improvements, the entirety of Evans Road from Ethanac Road to McLaughlin Road is currently unimproved (unpaved dirt) and will need to be constructed in order to serve the proposed project. Additionally, more than 50% of the land within the vicinity of the project site is vacant, meaning that the project site is not located in a developed area of the City and is not located adjacent to existing roads. The EIR must be revised to state factual project components as part of a revised EIR.

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SCAG's Connect SoCal Demographics and Growth Forecast[15] notes that the City will add 15,400 jobs between 2016 - 2045. Utilizing the SCAG Employment Density Study calculation of 694 employees, the project represents 4.5% of the City's employment growth from 2016 - 2045. A single project accounting for this amount of the projected employment growth over 29 years represents a significant amount of growth. A revised EIR must be prepared to include this analysis, and also provide a cumulative analysis discussion of projects approved since 2016 and projects "in the pipeline" to determine if the project will exceed SCAG's employment growth forecast for the City. For example, other recent industrial projects[16] such as Menifee Commerce Center (2,885 employees), Menifee Commerce Center Phase II (1,962 employees), Northern Gateway Commerce Center (2,267 employees), Ares Warehouse on Murrieta (952 employees), Capstone Industrial (1,205 employees), Wheat Warehouse (151 employees), Corsica Business Park (477 employees), Trumble and Watson Warehouse (571 employees), McLaughlin San Jacinto Warehouses (846 employees), Mapes and Sherman Warehouse (478 employees), United Carports Warehouse (105 employees), Motte Business Center (1,964 employees), Ethanac and Barnett Warehouse (440 employees), CADO Menifee (860 employees), Compass Northern Gateway (599 employees), and Ares Murrieta Road Warehouse (652 employees) combined with the proposed project will cumulatively generate 17,353 employees, which is 112% of the City's employment growth forecast over 29 years accounted for by 18 industrial projects submitted since 2020. This exceeds the projected growth forecast for the City. This number increases exponentially when the City's commercial development activity and other projects since 2016 (SCAG) and 2013 (General Plan) are added to the calculation. A revised EIR must be prepared to include a cumulative analysis on this topic in order to provide an adequate and accurate environmental analysis. 44

Conclusion

For the foregoing reasons, GSEJA believes the EIR is flawed and a revised EIR must be prepared for the proposed project and circulated for public review. Golden State Environmental Justice Alliance requests to be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. Send all communications to Golden State Environmental Justice Alliance P.O. Box 45

[15] SCAG Connect SoCal Demographics and Growth Forecast adopted September 3, 2020 https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf?1606001579

[16] Data for all listed projects via City of Menifee Land Development Projects Map https://cityofmenifee.maps.arcgis.com/apps/instant/minimalist/index.html?appid=55fc56d4eee94e588a28a958cebac908 and Accela Menifee https://aca-prod.accela.com/MENIFEE/Cap/CapHome.aspx?module=Planning&TabName=Planning&TabList=Home%7C0%7CPermits%7C1%7CEngineering%7C2%7CPlanning%7C3%7CFire%7C4%7CCurrentTabIndex%7C3

79222 Corona, CA 92877.

Sincerely,

Gary Ho
Blum, Collins & Ho LLP

Attachment: SWAPE Analysis

cont'd
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SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

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July 16, 2024

Gary Ho
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Subject: Comments on the Northern Gateway Logistics Center Project (SCH No. 2021110379)

Dear Mr. Ho,

We have reviewed the May 2024 Draft Environmental Impact Report ("DEIR") for the Northern Gateway Logistics Center ("Project") located in the City of Menifee ("City"). The Project proposes to construct 398,252-square-feet ("SF") of industrial space, including one building consisting of 6,000-SF of office space and 99,547-SF of warehouse space and a second building consisting of 8,000-SF of office space and 277,715-SF of warehouse space, on the 20.17-acre site. 46

Our review concludes that the DEIR fails to adequately evaluate the Project's hazards, hazardous materials, air quality, and greenhouse gas impacts. As a result, emissions and health risk impacts associated with construction and operation of the proposed Project may be underestimated and inadequately addressed. A revised Environmental Impact Report ("EIR") should be prepared to adequately assess and mitigate the potential hazards, hazardous materials, air quality, and greenhouse gas impacts that the project may have on the environment.

Hazards and Hazardous Materials

Inadequate Disclosure and Analysis of Impacts

The DEIR relies on a 2023 Phase I Environmental Site Assessment (Phase I ESA, included as Appendix H) to determine hazardous and hazardous materials impacts. The Phase I ESA found that the Project site has been utilized for agricultural purposes from as early as 1938.

The DEIR concluded that "pesticides or other agricultural chemicals may have been applied on the project site" (p. 4.8-9). The DEIR further states that "If residual concentrations of these chemicals is

present, it is unlikely that they would be the subject of regulatory scrutiny in the context of a non-residential land use scenario" (p. 4.8-9). The DEIR and the Phase I ESA do not document any soil sampling results to substantiate this conclusion. To provide an adequate basis to support the claim that residual concentrations of pesticides do not constitute an impact, soil sampling would need to be conducted.

Because they are persistent in the environment, pesticides - including DDT and DDE - may be present in Project site soils. Exposure to DDT can result in headaches, nausea, and seizures.[1] The U.S. EPA identifies DDT and DDE as probable human carcinogens.[2]

To provide an adequate basis for determining impacts, a revised DEIR needs to be prepared to include the results of a soil sampling program for residual concentrations of pesticides at the Project site. Any contamination that is identified above regulatory screening levels, including California Office of Environmental Health Hazard Assessment's Soil Screening Numbers[3], should be further evaluated and cleaned up, if necessary, in coordination with the Regional Water Quality Control Board and the California Department of Toxics Substances Control.

Air Quality

Unsubstantiated Input Parameters Used to Estimate Project Emissions

The DEIR's air quality analysis relies on emissions calculated with the California Emissions Estimator Model ("CalEEMod") Version 2020.4.0 (p. 4.2-17).[4] CalEEMod provides recommended default values based on site-specific information, such as land use type, meteorological data, total lot acreage, project type and typical equipment associated with project type. If more specific project information is known, the user can change the default values and input project-specific values, but the California Environmental Quality Act ("CEQA") requires that such changes be justified by substantial evidence. Once all of the values are inputted into the model, the Project's construction and operational emissions are calculated, and "output files" are generated. These output files disclose which parameters are used in calculating the Project's air pollutant emissions by identifying any changes to default values. Justifications are provided for each altered value.

cont'd
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When reviewing the Project's CalEEMod output files, provided in the Air Quality Assessment ("AQ Report") as Appendix B1 to the DEIR, we found that several model inputs were not consistent with information disclosed in the DEIR. As a result, the Project's construction and operational emissions may be underestimated. A revised EIR should be prepared to include an updated air quality analysis that adequately evaluates the impacts that construction and operation of the Project will have on local and regional air quality.

[1] "DDT, DDE, and DDD." ToxFAQs, April 2022, available at: https://www.atsdr.cdc.gov/toxfaqs/tfacts35.pdf
[2] Ibid.
[3] "Human and Ecological Risk Office (HERO)," Department of Toxic Substances Control, available at: https://dtsc.ca.gov/human-health-risk-hero/
[4] "CalEEMod Version 2020.4.0." California Air Pollution Control Officers Association (CAPCOA), May 2021, *available at:* https://www.aqmd.gov/caleemod/download-model.

2

Unsubstantiated Changes to Individual Construction Phase Lengths

Review of the CalEEMod output files demonstrates that the "Northern Gateway Logistics Center Detailed Report" model includes changes to the default construction schedule (see excerpt below) (Appendix B1, pp. 108):

8. User Changes to Default Data

Screen	Justification
Construction: Construction Phases	Per Industrial Questionnaire.
Operations: Vehicle Data	Per Trip Gen.
Land Use	Lot acreage is adjusted to cover project site.
Construction: Off-Road Equipment	Added equipment for trenching.
Construction: Dust From Material Movement	Per Industrial Questionnaire.

As a result of these changes, the model includes the following construction schedule (see excerpt below) (Appendix B1, pp. 145, 146):

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase
Site Preparation	Site Preparation	11/1/2024	12/31/2024	5.00	43.0
Grading	Grading	11/30/2024	2/28/2025	5.00	65.0
Building Construction	Building Construction	2/1/2025	10/31/2025	5.00	195
Paving	Paving	2/1/2025	9/30/2025	5.00	172
Architectural Coating	Architectural Coating	8/1/2025	10/31/2025	5.00	66.0
Infrastructure Improvements	Trenching	3/1/2025	6/30/2025	5.00	86.0

The CalEEMod User's Guide requires any changes to model defaults be justified.[5] As shown in the "User Changes to Default Data" table, the justification provided for this change is:

> **"Per Industrial Questionnaire" (Appendix B1, pp. 108).**

Regarding the Project's construction duration, the DEIR states:

> **"The Project is anticipated to be developed in one phase. Should the Project be approved, construction is anticipated to occur over a duration of approximately 12 months, beginning in November 2024. The Project is expected to be completed in late 2025" (p. 2-4).**

The changes to the individual construction phase lengths, however, are unsubstantiated. While the DEIR justifies a total length of Project construction of 12 months, the DEIR fails to mention the individual construction phase lengths whatsoever. Until the *individual* construction phase lengths are substantiated, the model should have included proportionately altered individual phase lengths to match the proposed construction duration of 12 months.[6]

cont'd
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[5] **"CalEEMod User's Guide." California Air Pollution Control Officers Association (CAPCOA), May 2021, *available at:* https://www.aqmd.gov/caleemod/user's-guide, p. 1, 14.**
[6] **See Attachment A for proportionately altered construction schedule.**

3

CalEEMod uses construction phase lengths to calculate the Project's construction emissions. Each construction phase is associated with different emissions activities (see excerpt below).[7]

> *Demolition* involves removing buildings or structures.
>
> *Site Preparation* involves clearing vegetation (grubbing and tree/stump removal) and removing stones and other unwanted material or debris prior to grading.
>
> *Grading* involves the cut and fill of land to ensure that the proper base and slope is created for the foundation.
>
> *Building Construction* involves the construction of the foundation, structures and buildings.
>
> *Architectural Coating* involves the application of coatings to both the interior and exterior of buildings or structures, the painting of parking lot or parking garage striping, associated signage and curbs, and the painting of the walls or other components such as stair railings inside parking structures.
>
> *Paving* involves the laying of concrete or asphalt such as in parking lots, roads, driveways, or sidewalks.

By disproportionately altering and extending some of the individual construction phase lengths without proper justification, the model assumes there are a greater number of days to complete the construction activities required by the prolonged phases. There will be less construction activities required per day and, consequently, less pollutants emitted per day. Until we are able to verify the revised construction schedule, the model may underestimate the peak daily emissions associated with some phases of construction and should not be relied upon to determine Project significance.

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Updated Analysis Indicates a Potentially Significant Air Quality Impact

To more accurately estimate the Project's construction-related emissions, we prepared an updated CalEEMod model, using the Project-specific information provided by the DEIR. In our updated model, we proportionately altered the construction phase lengths to match the total construction duration of 12 months.[8] All other values were consistent with the DEIR's model.

Our updated analysis estimates that the Project's construction-related volatile organic compound ("VOC") emissions exceed the applicable SCAQMD thresholds of 75-pounds per day ("lbs/day"), respectively, as referenced by the DEIR (p. 4.2-23, Table 4.2-8) (see table below).

[7] "CalEEMod User's Guide." California Air Pollution Control Officers Association (CAPCOA), May 2021, *available at:* https://www.aqmd.gov/caleemod/user's-guide, p. 32.
[8] See Attachment A for construction calculations and Attachment B for the updated CalEEMod model.

4

Construction	VOC (lbs/day)
DEIR	60.67
SWAPE	292.3
% Increase	382%
SCAQMD Threshold	75
Exceeds?	*Yes*

Construction-related VOC emissions, as estimated by SWAPE, increase by approximately 381.8%, and exceed the applicable SCAQMD significance threshold. Our model demonstrates that the Project would result in a potentially significant air quality impact that was not previously identified or addressed by the DEIR. A revised EIR should be prepared to adequately assess and mitigate the potential air quality impacts that the Project may have on the environment.

Greenhouse Gas

Failure to Adequately Evaluate Greenhouse Gas Impacts

The DEIR estimates that the Project would generate net annual greenhouse gas ("GHG") emissions of 2,696 metric tons of carbon dioxide equivalents per year ("MT CO_2e/year"), which would not exceed the SCAQMD bright-line threshold of 3,000 MT CO_2e/year (see excerpt below) (p. 4.7-20, Table 4.7-3).

cont'd 46

Table 4.7-3: Project Greenhouse Gas Emissions

Emissions Source	MTCO2e per Year	
	Unmitigated	Mitigated[1][2]
Area and Indirect Sources		
Construction Amortized Over 30 Years	38	38
Area Source	0	0
Energy – Electricity	372	372
Energy – Natural Gas	444	0
Off-road – Yard Trucks	59	10
Off-Road – Forklifts	111	69
Emergency Backup Generator	21	21
WaSN	117	117
Water and Wastewater	225	225
Mobile Sources		
Trucks	816	816
Passenger Cars	1,024	1,024
Total	3,378	2,696
Threshold	3,000	3,000
Exceeds Threshold?	Yes	No

1. MM GHG-1 prohibits the use of natural gas.
2. MM GHG-2 requires all off-road equipment (such as yard trucks and forklifts) to be zero-emission (i.e., powered by electricity or other alternative fuels). The warehouse building shall include the necessary charging stations for cargo handling equipment. The building manager or their designee shall be responsible for enforcing these requirements. The project shall use electric equipment for off-road equipment.
3. Off-road equipment electricity emissions are incorporated into the energy-electricity category.

Source: Ibid. Page 28 – Table 4

The DEIR concludes:

5

> "As shown in Table 4.7-3, mitigation measures would reduce Project GHG emissions by approximately 14 percent and total mitigated emissions (2,696 MTCO2e per year) would not exceed the SCAQMD threshold of 3,000 MTCO2e per year. Therefore, GHG emissions associated with the Project would be less than significant with implementation of MMs GHG-1 and GHG-2" (p. 4.7-21).

However, the DEIR's analysis, as well as the subsequent less-than-significant impact conclusion, is unsupported for two reasons:

(1) The DEIR's quantitative GHG analysis relies upon an outdated threshold; and
(2) The DEIR's unsubstantiated air model indicates a potentially significant impact.

1) Reliance on an Outdated Quantitative GHG Threshold

The DEIR estimates that the Project would generate net annual GHG emissions of 2,696 MT CO_2e/year, which would not exceed the SCAQMD bright-line threshold of 3,000 MT CO_2e/year (p. 48, Table 4.7-3). However, the guidance that provided the 3,000 MT CO_2e/year threshold, the SCAQMD's 2008 *Interim CEQA GHG Significance Threshold for Stationary Sources, Rules, and Plans* report, was developed when the Global Warming Solutions Act of 2006, commonly known as "AB 32", was the governing statute for GHG reductions in California. AB 32 requires California to reduce GHG emissions to 1990 levels by 2020.[9] AEP guidance states:

> "[F]or evaluating projects with a post 2020 horizon, the threshold will need to be revised based on a new gap analysis that would examine 17 development and reduction potentials out to the next GHG reduction milestone."[10]

As it is currently July 2024, thresholds for 2020 are not applicable to the proposed Project and should be revised to reflect the current GHG reduction target. The SCAQMD bright-line threshold of 3,000 MT CO_2e/year is therefore outdated and inapplicable to the proposed Project, and the DEIR's less-than-significant GHG impact conclusion should not be relied upon. Instead, we recommend that the Project apply the SCAQMD 2035 service population efficiency target of 3.0 metric tons of carbon dioxide equivalents per service population per year ("MT CO_2e/SP/year"), which was calculated by applying a 40% reduction to the 2020 targets.[11]

2) Failure to Identify a Potentially Significant GHG Impact

In an effort to quantitatively evaluate the Project's GHG emissions, we compared the Project's GHG emissions, as estimated by the Greenhouse Gas Emissions Analysis ("GHG Analysis"), provided as

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[9] "Health & Safety Code 38550." California State Legislature, January 2007, *available at:* https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=HSC&sectionNum=38550.
[10] "Beyond Newhall and 2020: A Field Guide to New CEQA Greenhouse Gas Thresholds and Climate Action Plan Targets for California." Association of Environmental Professionals (AEP), October 2016, *available at:* https://califaep.org/docs/AEP-2016_Final_White_Paper.pdf, p. 39.
[11] "Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #15." SCAQMD, September 2010, *available at:* http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-minutes.pdf, p. 2.

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Appendix G to the DEIR, to the SCAQMD 2035 efficiency target of 3.0 MT CO_2e/SP/year. When applying this threshold, the Project's unsubstantiated air model indicates a potentially significant GHG impact.

The GHG Analysis estimates that the Project would generate net annual GHG emissions of 2,696 MT CO_2e/year (p. 48, Table 4.7-3). According to CAPCOA's *CEQA & Climate Change* report, a service population ("SP") is defined as "the sum of the number of residents and the number of jobs supported by the project."[12] According to the DEIR, the estimated number of employees to operate the warehouses would be approximately 423 people (p. 4.15-17). When dividing the Project's net annual GHG emissions, as estimated by the DEIR, by an SP of 423 people, we find that the Project would emit approximately 6.37 MT CO_2e/SP/year (see table below).[13]

Project Greenhouse Gas Emissions	
Annual Emissions (MT CO_2e/year)	2,696
Service Population	423
Service Population Efficiency (MT CO_2e/SP/year)	6.37
SCAQMD 2035 Target	**3.0**
Exceeds?	***Yes***

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The Project's service population efficiency value exceeds the SCAQMD 2035 efficiency target of 3.0 MT CO_2e/SP/year, indicating a potentially significant impact not previously identified or addressed by the DEIR. As a result, the DEIR's less-than-significant GHG impact conclusion should not be relied upon. A revised EIR should be prepared, including an updated GHG analysis and incorporating additional mitigation measures to reduce the Project's GHG emissions to less-than-significant levels.

Mitigation

Feasible Mitigation Measures Available to Reduce Emissions

According to CEQA Guidelines § 15096(g)(2):

> "When an updated EIR has been prepared for a project, the Responsible Agency shall not approve the project as proposed if the agency finds any feasible alternative or feasible mitigation measures within its powers that would substantially lessen or avoid any significant effect the project would have on the environment."

The DEIR is consequently required under CEQA to implement all feasible mitigation to reduce the Project's potential impacts. As demonstrated in the sections above, the Project would result in potentially significant air quality and greenhouse gas impacts that should be mitigated further.

[12] "CEQA & Climate Change." California Air Pollution Control Officers Association (CAPCOA), January 2008, *available at:* https://www.ourair.org/wp-content/uploads/CAPCOA-CEQA-and-Climate-Change.pdf., p. 71-72.
[13] Calculated: (2,696 MT CO_2e/year) / (423 service population) = (6.37 MT CO_2e/SP/year).

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First, in order to reduce the VOC emissions associated with Project construction, we recommend the DEIR consider incorporating the following mitigation measure from the California Department of Justice ("DOJ"):[14]

- Require the use of super compliant, low-VOC paints less than 10 g/L during the architectural coating construction phase and during Project maintenance.

Los Angeles County recommends:[15]

- If paints and coatings with VOC content of 0 grams/liter to less than 10 grams/liter cannot be utilized, the developer shall avoid application of architectural coatings during the peak smog season: July, August, and September.

Second, in order to reduce the GHG emissions associated with the Project, we recommend several mitigation measures (see list below).

SCAG's 2020 RTP/SCS PEIR's Greenhouse Gas Project Level Mitigation Measures ("PMM-GHG-1") recommends:

- Measures that encourage transit use, carpooling, bike-share and car-share programs, active transportation, and parking strategies, including, but not limited to the following:
  - Promote transit-active transportation coordinated strategies;
  - Increase bicycle carrying capacity on transit and rail vehicles;
  - Improve or increase access to transit;
  - Increase access to common goods and services, such as groceries, schools, and day care;
  - Incorporate the neighborhood electric vehicle network;
  - Orient the project toward transit, bicycle and pedestrian facilities;
  - Improve pedestrian or bicycle networks, or transit service;
  - Provide traffic calming measures;
  - Provide bicycle parking;
  - Limit or eliminate park supply;
  - Unbundle parking costs;
  - Provide parking cash-out programs;
  - Implement or provide access to commute reduction program;
- Incorporate bicycle and pedestrian facilities into project designs, maintaining these facilities, and providing amenities incentivizing their use; and planning for and building local bicycle projects that connect with the regional network;

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[14] "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act." State of California Department of Justice, September 2022, *available at*: https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf, p. 8 – 10.
[15] "Mitigation Monitoring and Reporting Program." Los Angeles County Housing Element Update Program EIR. August 2021, *available at*: https://planning.lacounty.gov/wp-content/uploads/2023/07/Housing_final-peir-mitigation-monitoring.pdf.

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- Improving transit access to rail and bus routes by incentives for construction and transit facilities within developments, and/or providing dedicated shuttle service to transit stations;
- Designate a percentage of parking spaces for ride-sharing vehicles or high-occupancy vehicles, and provide adequate passenger loading and unloading for those vehicles;
- Require at least five percent of all vehicle parking spaces include electric vehicle charging stations, or at a minimum, require the appropriate infrastructure to facilitate sufficient electric charging for passenger vehicles and trucks to plug-in;
- Implement preferential parking permit program;
- Implement school pool and bus programs;
- Encourage telecommuting and alternative work schedules, such as:
    - Staggered starting times;
    - Flexible schedules;
    - Compressed work weeks;
    - Implement commute trip reduction marketing, such as:
    - New employee orientation of trip reduction and alternative mode options;
    - Event promotions;
    - Publications;
- Price workplace parking, such as:
    - Explicitly charging for parking for its employees;
    - Implementing above market rate pricing;
    - Validating parking only for invited guests;
    - Not providing employee parking and transportation allowances; and
    - Educating employees about available alternatives;
- Adopting employer trip reduction measures to reduce employee trips such as vanpool and carpool programs, providing end-of-trip facilities, and telecommuting programs including but not limited to measures that:
    - Provide car-sharing, bike sharing, and ride-sharing programs;
    - Provide transit passes;
    - Shift single occupancy vehicle trips to carpooling or vanpooling, for example providing ride-matching services;
    - Provide incentives or subsidies that increase that use of modes other than single-occupancy vehicle;
    - Provide on-site amenities at places of work, such as priority parking for carpools and vanpools, secure bike parking, and showers and locker rooms;
    - Provide employee transportation coordinators at employment sites; and
    - Provide a guaranteed ride home service to users of non-auto modes.

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The California Air Resources Board ("CARB") recommends: [16]

[16] "Recommended Air Pollution Emission Reduction Measures for Warehouses and Distribution Centers." CARB, August 2023, *available at*: https://ww2.arb.ca.gov/sites/default/files/2023-08/CARB%20Comments%20-%20NOP%20for%20the%20%20Oak%20Valley%20North%20Project%20DEIR.pdf; Attachment A, p. 5 – 8.

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- Requiring all off-road diesel-powered equipment used during construction to be equipped with Tier 4 or cleaner engines, except for specialized construction equipment in which Tier 4 engines are not available. In place of Tier 4 engines, off-road equipment can incorporate retrofits, such that, emission reductions achieved are equal to or exceed that of a Tier 4 engine;
- Requiring all heavy-duty trucks entering the construction site during the grading and building construction phases be model year 2014 or later. All heavy-duty haul trucks should also meet CARB's lowest optional low-oxides of nitrogen (NOx) standard starting in the year 2022;
- Require all construction equipment and fleets to be in compliance with all current air quality regulations;
- Requiring all loading/unloading docks and trailer spaces be equipped with electrical hookups for trucks with transport refrigeration units (TRU) or auxiliary power units;
- Requiring all TRUs entering the project-site be plug-in capable;
- Requiring all service equipment (e.g., yard hostlers, yard equipment, forklifts, and pallet jacks) used within the project site to be zero-emission;
- Requiring future tenants to exclusively use zero-emission light and medium-duty delivery trucks and vans;
- Including contractual language in tenant lease agreements restricting trucks and support equipment from idling longer than two minutes while on site; and
- Requiring the installing of vegetative walls or other effective barriers that separate loading docks and people living or working nearby.

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The DOJ recommends: [17]

- Installing solar photovoltaic systems on the project site of a specified electrical generation capacity that is equal to or greater than the building's projected energy needs, including all electrical chargers;
- Designing all project building roofs to accommodate the maximum future coverage of solar panels and installing the maximum solar power generation capacity feasible;
- Oversizing electrical rooms by 25 percent or providing a secondary electrical room to accommodate future expansion of electric vehicle charging capability;
- Requiring all stand-by emergency generators to be powered by a non-diesel fuel;
- Meeting CalGreen Tier 2 green building standards, including all provisions related to designated parking for clean air vehicles, electric vehicle charging, and bicycle parking;
- Designing to LEED green building certification standards;
- Constructing zero-emission truck charging/fueling stations proportional to the number of dock doors at the project;
- Running conduit to designated locations for future electric truck charging stations;
- Constructing and maintaining electric light-duty vehicle charging stations proportional to the number of employee parking spaces (for example, requiring at least 10% of all employee parking

[17] *Ibid.* p. 9 – 10.

spaces to be equipped with electric vehicle charging stations of at least Level 2 charging performance);

- Running conduit to an additional proportion of employee parking spaces for a future increase in the number of electric light-duty charging stations;
- Requiring facility operators to train managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks;
- Providing meal options onsite or shuttles between the facility and nearby meal destinations;
- Posting signs at every truck exit driveway providing directional information to the truck route;
- Requiring that every tenant train its staff in charge of keeping vehicle records in diesel technologies and compliance with CARB regulations, by attending CARB-approved courses. Also require facility operators to maintain records on-site demonstrating compliance and make records available for inspection by the local jurisdiction, air district, and state upon request;
- Requiring tenants to enroll in the United States Environmental Protection Agency's SmartWay program, and requiring tenants who own, operate, or hire trucking carriers with more than 100 trucks to use carriers that are SmartWay carriers; and
- Providing tenants with information on incentive programs, such as the Carl Moyer Program and Voucher Incentive Program, to upgrade their fleets.

CEQA Guidelines 15126.4 (c)(3) include "[o]ffsite measures, including offsets that are not otherwise required, to mitigate a project's emissions" as an option for GHG mitigation.[18] An example of this was in the case of the Oakland Sports and Mixed-Use Project, where off-site reduction measures in the neighboring communities were recommended.[19] We recommend consideration of local carbon offset programs to reduce the Project's GHG impacts as a measure of last result.

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As demonstrated above, we have provided several mitigation measures that would reduce Project-related VOC and GHG emissions developed from sources including SCAG, the DOJ and others. These measures offer a cost-effective, feasible way to incorporate lower-emitting design features into the proposed Project, which subsequently reduce emissions released during Project construction and operation.

A revised EIR should be prepared that includes *all* feasible mitigation measures, as well as updated air quality and GHG analyses to ensure that the necessary mitigation measures are implemented to reduce emissions to the maximum extent feasible. The revised EIR should also demonstrate a commitment to

[18] "Cal. Code Regs. tit. 14 § 15126.4." CEQA Guidelines, May 2024, *available at*: https://casetext.com/regulation/california-code-of-regulations/title-14-natural-resources/division-6-resources-agency/chapter-3-guidelines-for-implementation-of-the-california-environmental-quality-act/article-9-contents-of-environmental-impact-reports/section-151264-consideration-and-discussion-of-mitigation-measures-proposed-to-minimize-significant-effects.

[19] "Cal. Pub. Resources Code § 21168.6.7." 2023, *available at*: https://casetext.com/statute/california-codes/california-public-resources-code/division-13-environmental-quality/chapter-6-limitations/section-2116867-oakland-sports-and-mixed-use-project-conditions-for-approval-certification-of-project-for-streamlining.

the implementation of these measures prior to Project approval, to ensure that the Project's potentially significant emissions are reduced to the maximum extent possible.

Disclaimer

SWAPE has received limited discovery regarding this project. Additional information may become available in the future; thus, we retain the right to revise or amend this report when additional information becomes available. Our professional services have been performed using that degree of care and skill ordinarily exercised, under similar circumstances, by reputable environmental consultants practicing in this or similar localities at the time of service. No other warranty, expressed or implied, is made as to the scope of work, work methodologies and protocols, site conditions, analytical testing results, and findings presented. This report reflects efforts which were limited to information that was reasonably accessible at the time of the work, and may contain informational gaps, inconsistencies, or otherwise be incomplete due to the unavailability or uncertainty of information obtained or provided by third parties.

Sincerely,

Matt Hagemann, P.G., C.Hg.

Paul E. Rosenfeld, Ph.D.

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Attachment A: Updated Construction Calculations
Attachment B: SWAPE's CalEEMod Output Files
Attachment C: Matt Hagemann CV
Attachment D: Paul Rosenfeld CV

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Attachment A

Construction Schedule Calculations					
Phase	Default Phase Length	Construction Duration	%	Construction Duration	Revised Phase Length
Site Preparation	10	531	0.0188	338	6
Grading	30	531	0.0565	338	19
Building Construction	300	531	0.5650	338	191
Paving	20	531	0.0377	338	13
Architectural Coating	20	531	0.0377	338	13
Infrastructure Improveme	30	531	0.0565	338	19

	Total Default Construction Duration	Revised Construction Duration
Start Date	11/1/2024	11/1/2024
End Date	4/16/2026	10/5/2025
Total Days	531	338

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 Attachment B

Northern Gateway Logistics Center - Riverside-South Coast County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Northern Gateway Logistics Center

Riverside-South Coast County, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Office Building	14.00	1000sqft	0.32	14,000.00	0
Unrefrigerated Warehouse-No Rail	384.00	1000sqft	11.20	384,252.00	0
Parking Lot	354.00	Space	3.19	0.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.4	**Precipitation Freq (Days)**	28
Climate Zone	10			**Operational Year**	2025
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	390.98	**CH4 Intensity (lb/MWhr)**	0.033	**N2O Intensity (lb/MWhr)**	0.004

1.3 User Entered Comments & Non-Default Data

Project Characteristics - Consistent with DEIR's model.

Land Use - Consistent with DEIR's model.

Construction Phase - See comment on: "Unsubstantiated Changes to Individual Construction Phase Lengths".

Off-road Equipment - Consistent with DEIR's model.

Off-road Equipment - Consistent with DEIR's model.

Off-road Equipment - Consistent with DEIR's model.

Off-road Equipment - Consistent with DEIR's model.

Trips and VMT - Consistent with DEIR"s model.

Grading - Consistent with DEIR's model.

Architectural Coating - Consistent with DEIR"s model.

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Vehicle Trips - Consistent with DEIR's model.

Energy Use - Consistent with DEIR's model.

Water And Wastewater - Consistent with DEIR's model.

Table Name	Column Name	Default Value	New Value
tblArchitecturalCoating	ConstArea_Parking	0.00	22,504.00
tblConstructionPhase	NumDays	10.00	6.00
tblConstructionPhase	NumDays	30.00	19.00
tblConstructionPhase	NumDays	30.00	19.00
tblConstructionPhase	NumDays	300.00	191.00
tblConstructionPhase	NumDays	20.00	13.00
tblConstructionPhase	NumDays	20.00	13.00
tblConstructionPhase	PhaseEndDate	11/14/2024	11/8/2024
tblConstructionPhase	PhaseEndDate	12/26/2024	12/5/2024
tblConstructionPhase	PhaseEndDate	2/6/2025	1/1/2025
tblConstructionPhase	PhaseEndDate	4/2/2026	9/25/2025
tblConstructionPhase	PhaseEndDate	4/30/2026	10/14/2025
tblConstructionPhase	PhaseEndDate	5/28/2026	10/31/2025
tblConstructionPhase	PhaseStartDate	11/15/2024	11/9/2024
tblConstructionPhase	PhaseStartDate	12/27/2024	12/6/2024
tblConstructionPhase	PhaseStartDate	2/7/2025	1/2/2025
tblConstructionPhase	PhaseStartDate	4/3/2026	9/26/2025
tblConstructionPhase	PhaseStartDate	5/1/2026	10/15/2025
tblGrading	AcresOfGrading	57.00	258.00
tblGrading	AcresOfGrading	9.00	64.50
tblGrading	MaterialExported	0.00	1,519.00
tblLandUse	LandUseSquareFeet	384,000.00	384,252.00
tblLandUse	LandUseSquareFeet	141,600.00	0.00
tblLandUse	LotAcreage	8.82	11.20

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

tblOffRoadEquipment	HorsePower	158.00	84.00
tblOffRoadEquipment	HorsePower	78.00	367.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	4.00
tblTripsAndVMT	HaulingTripNumber	150.00	2.92
tblTripsAndVMT	WorkerTripNumber	33.00	5.00
tblVehicleTrips	ST_TR	2.21	0.00
tblVehicleTrips	ST_TR	1.74	0.48
tblVehicleTrips	SU_TR	0.70	0.00
tblVehicleTrips	SU_TR	1.74	0.48
tblVehicleTrips	WD_TR	9.74	0.00
tblVehicleTrips	WD_TR	1.74	0.48
tblWater	OutdoorWaterUseRate	0.00	1,669.00

2.0 Emissions Summary

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2024	0.0863	0.8640	0.7333	1.7200e-003	0.3700	0.0362	0.4063	0.1136	0.0333	0.1469	0.0000	150.9976	150.9976	0.0481	7.0000e-005	152.2218
2025	2.0946	1.5201	2.1881	5.2300e-003	0.2502	0.0569	0.3071	0.0634	0.0535	0.1169	0.0000	468.4154	468.4154	0.0618	0.0180	475.3229
Maximum	**2.0946**	**1.5201**	**2.1881**	**5.2300e-003**	**0.3700**	**0.0569**	**0.4063**	**0.1136**	**0.0535**	**0.1469**	**0.0000**	**468.4154**	**468.4154**	**0.0618**	**0.0180**	**475.3229**

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Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2024	0.0863	0.8640	0.7333	1.7200e-003	0.3700	0.0362	0.4063	0.1136	0.0333	0.1469	0.0000	150.9975	150.9975	0.0481	7.0000e-005	152.2216
2025	2.0946	1.5201	2.1881	5.2300e-003	0.2502	0.0569	0.3071	0.0634	0.0535	0.1169	0.0000	468.4151	468.4151	0.0618	0.0180	475.3226
Maximum	**2.0946**	**1.5201**	**2.1881**	**5.2300e-003**	**0.3700**	**0.0569**	**0.4063**	**0.1136**	**0.0535**	**0.1469**	**0.0000**	**468.4151**	**468.4151**	**0.0618**	**0.0180**	**475.3226**

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	11-1-2024	1-31-2025	1.1681	1.1681
2	2-1-2025	4-30-2025	0.5375	0.5375
3	5-1-2025	7-31-2025	0.5534	0.5534
4	8-1-2025	9-30-2025	0.3551	0.3551
		Highest	1.1681	1.1681

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	1.6246	9.0000e-005	9.5700e-003	0.0000		3.0000e-005	3.0000e-005		3.0000e-005	3.0000e-005	0.0000	0.0187	0.0187	5.0000e-005	0.0000	0.0199
Energy	4.4200e-003	0.0402	0.0338	2.4000e-004		3.0600e-003	3.0600e-003		3.0600e-003	3.0600e-003	0.0000	224.6924	224.6924	0.0161	2.6500e-003	225.8859
Mobile	0.0968	0.1643	1.0761	2.7000e-003	0.2987	2.1500e-003	0.3009	0.0798	2.0200e-003	0.0818	0.0000	249.9673	249.9673	0.0120	0.0120	253.8281
Waste						0.0000	0.0000		0.0000	0.0000	75.9146	0.0000	75.9146	4.4864	0.0000	188.0751
Water						0.0000	0.0000		0.0000	0.0000	28.9616	213.8125	242.7741	2.9927	0.0724	339.1736
Total	**1.7257**	**0.2046**	**1.1195**	**2.9400e-003**	**0.2987**	**5.2400e-003**	**0.3040**	**0.0798**	**5.1100e-003**	**0.0849**	**104.8761**	**688.4909**	**793.3670**	**7.5073**	**0.0870**	**1,006.9826**

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Northern Gateway Logistics Center - Riverside-South Coast County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	1.6246	9.0000e-005	9.5700e-003	0.0000		3.0000e-005	3.0000e-005		3.0000e-005	3.0000e-005	0.0000	0.0187	0.0187	5.0000e-005	0.0000	0.0199
Energy	4.4200e-003	0.0402	0.0338	2.4000e-004		3.0600e-003	3.0600e-003		3.0600e-003	3.0600e-003	0.0000	224.6924	224.6924	0.0161	2.6500e-003	225.8859
Mobile	0.0968	0.1643	1.0761	2.7000e-003	0.2987	2.1500e-003	0.3009	0.0798	2.0200e-003	0.0818	0.0000	249.9673	249.9673	0.0120	0.0120	253.8281
Waste						0.0000	0.0000		0.0000	0.0000	75.9146	0.0000	75.9146	4.4864	0.0000	188.0751
Water						0.0000	0.0000		0.0000	0.0000	28.9616	213.8125	242.7741	2.9927	0.0724	339.1736
Total	**1.7257**	**0.2046**	**1.1195**	**2.9400e-003**	**0.2987**	**5.2400e-003**	**0.3040**	**0.0798**	**5.1100e-003**	**0.0849**	**104.8761**	**688.4909**	**793.3670**	**7.5073**	**0.0870**	**1,006.9826**

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	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Site Preparation	Site Preparation	11/1/2024	11/8/2024	5	6	
2	Grading	Grading	11/9/2024	12/5/2024	5	19	
3	Infrastructure Improvements	Grading	12/6/2024	1/1/2025	5	19	

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

4	Building Construction	Building Construction	1/2/2025	9/25/2025	5	191	
5	Paving	Paving	9/26/2025	10/14/2025	5	13	
6	Architectural Coating	Architectural Coating	10/15/2025	10/31/2025	5	13	

Acres of Grading (Site Preparation Phase): 64.5

Acres of Grading (Grading Phase): 258

Acres of Paving: 3.19

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 597,378; Non-Residential Outdoor: 199,126; Striped Parking Area: 22,504 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Infrastructure Improvements	Excavators	4	8.00	84	0.38
Infrastructure Improvements	Trenchers	3	8.00	367	0.50
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Architectural Coating	Air Compressors	1	6.00	78	0.48
Infrastructure Improvements	Graders	1	8.00	187	0.41
Infrastructure Improvements	Rubber Tired Dozers	1	8.00	247	0.40
Infrastructure Improvements	Scrapers	2	8.00	367	0.48
Infrastructure Improvements	Tractors/Loaders/Backhoes	2	8.00	97	0.37

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Site Preparation	7	18.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	0.00	2.92	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Infrastructure Improvements	13	5.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	166.00	65.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	33.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

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3.1 Mitigation Measures Construction

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Site Preparation - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0884	0.0000	0.0884	0.0335	0.0000	0.0335	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	7.9800e-003	0.0815	0.0550	1.1000e-004		3.6900e-003	3.6900e-003		3.3900e-003	3.3900e-003	0.0000	10.0371	10.0371	3.2500e-003	0.0000	10.1183
Total	**7.9800e-003**	**0.0815**	**0.0550**	**1.1000e-004**	**0.0884**	**3.6900e-003**	**0.0921**	**0.0335**	**3.3900e-003**	**0.0369**	**0.0000**	**10.0371**	**10.0371**	**3.2500e-003**	**0.0000**	**10.1183**

cont'd
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Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.6000e-004	1.2000e-004	1.5800e-003	0.0000	5.9000e-004	0.0000	6.0000e-004	1.6000e-004	0.0000	1.6000e-004	0.0000	0.4371	0.4371	1.0000e-005	1.0000e-005	0.4406
Total	**1.6000e-004**	**1.2000e-004**	**1.5800e-003**	**0.0000**	**5.9000e-004**	**0.0000**	**6.0000e-004**	**1.6000e-004**	**0.0000**	**1.6000e-004**	**0.0000**	**0.4371**	**0.4371**	**1.0000e-005**	**1.0000e-005**	**0.4406**

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Site Preparation - 2024

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0884	0.0000	0.0884	0.0335	0.0000	0.0335	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	7.9800e-003	0.0815	0.0550	1.1000e-004		3.6900e-003	3.6900e-003		3.3900e-003	3.3900e-003	0.0000	10.0371	10.0371	3.2500e-003	0.0000	10.1183
Total	**7.9800e-003**	**0.0815**	**0.0550**	**1.1000e-004**	**0.0884**	**3.6900e-003**	**0.0921**	**0.0335**	**3.3900e-003**	**0.0369**	**0.0000**	**10.0371**	**10.0371**	**3.2500e-003**	**0.0000**	**10.1183**

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Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.6000e-004	1.2000e-004	1.5800e-003	0.0000	5.9000e-004	0.0000	6.0000e-004	1.6000e-004	0.0000	1.6000e-004	0.0000	0.4371	0.4371	1.0000e-005	1.0000e-005	0.4406
Total	**1.6000e-004**	**1.2000e-004**	**1.5800e-003**	**0.0000**	**5.9000e-004**	**0.0000**	**6.0000e-004**	**1.6000e-004**	**0.0000**	**1.6000e-004**	**0.0000**	**0.4371**	**0.4371**	**1.0000e-005**	**1.0000e-005**	**0.4406**

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Grading - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1940	0.0000	0.1940	0.0462	0.0000	0.0462	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0306	0.3076	0.2634	5.9000e-004		0.0127	0.0127		0.0117	0.0117	0.0000	51.7936	51.7936	0.0168	0.0000	52.2123
Total	**0.0306**	**0.3076**	**0.2634**	**5.9000e-004**	**0.1940**	**0.0127**	**0.2067**	**0.0462**	**0.0117**	**0.0579**	**0.0000**	**51.7936**	**51.7936**	**0.0168**	**0.0000**	**52.2123**

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Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	1.6000e-004	4.0000e-005	0.0000	3.0000e-005	0.0000	3.0000e-005	1.0000e-005	0.0000	1.0000e-005	0.0000	0.0786	0.0786	0.0000	1.0000e-005	0.0823
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.8000e-004	4.1000e-004	5.5600e-003	2.0000e-005	2.0900e-003	1.0000e-005	2.1000e-003	5.5000e-004	1.0000e-005	5.6000e-004	0.0000	1.5378	1.5378	4.0000e-005	4.0000e-005	1.5504
Total	**5.8000e-004**	**5.7000e-004**	**5.6000e-003**	**2.0000e-005**	**2.1200e-003**	**1.0000e-005**	**2.1300e-003**	**5.6000e-004**	**1.0000e-005**	**5.7000e-004**	**0.0000**	**1.6164**	**1.6164**	**4.0000e-005**	**5.0000e-005**	**1.6327**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Grading - 2024

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1940	0.0000	0.1940	0.0462	0.0000	0.0462	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0306	0.3076	0.2634	5.9000e-004		0.0127	0.0127		0.0117	0.0117	0.0000	51.7935	51.7935	0.0168	0.0000	52.2123
Total	**0.0306**	**0.3076**	**0.2634**	**5.9000e-004**	**0.1940**	**0.0127**	**0.2067**	**0.0462**	**0.0117**	**0.0579**	**0.0000**	**51.7935**	**51.7935**	**0.0168**	**0.0000**	**52.2123**

cont'd
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Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	1.6000e-004	4.0000e-005	0.0000	3.0000e-005	0.0000	3.0000e-005	1.0000e-005	0.0000	1.0000e-005	0.0000	0.0786	0.0786	0.0000	1.0000e-005	0.0823
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.8000e-004	4.1000e-004	5.5600e-003	2.0000e-005	2.0900e-003	1.0000e-005	2.1000e-003	5.5000e-004	1.0000e-005	5.6000e-004	0.0000	1.5378	1.5378	4.0000e-005	4.0000e-005	1.5504
Total	**5.8000e-004**	**5.7000e-004**	**5.6000e-003**	**2.0000e-005**	**2.1200e-003**	**1.0000e-005**	**2.1300e-003**	**5.6000e-004**	**1.0000e-005**	**5.7000e-004**	**0.0000**	**1.6164**	**1.6164**	**4.0000e-005**	**5.0000e-005**	**1.6327**

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Infrastructure Improvements - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0844	0.0000	0.0844	0.0331	0.0000	0.0331	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0469	0.4741	0.4065	9.9000e-004		0.0198	0.0198		0.0183	0.0183	0.0000	86.7493	86.7493	0.0281	0.0000	87.4507
Total	**0.0469**	**0.4741**	**0.4065**	**9.9000e-004**	**0.0844**	**0.0198**	**0.1043**	**0.0331**	**0.0183**	**0.0513**	**0.0000**	**86.7493**	**86.7493**	**0.0281**	**0.0000**	**87.4507**

cont'd
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Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.4000e-004	1.0000e-004	1.3200e-003	0.0000	4.9000e-004	0.0000	5.0000e-004	1.3000e-004	0.0000	1.3000e-004	0.0000	0.3642	0.3642	1.0000e-005	1.0000e-005	0.3672
Total	**1.4000e-004**	**1.0000e-004**	**1.3200e-003**	**0.0000**	**4.9000e-004**	**0.0000**	**5.0000e-004**	**1.3000e-004**	**0.0000**	**1.3000e-004**	**0.0000**	**0.3642**	**0.3642**	**1.0000e-005**	**1.0000e-005**	**0.3672**

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Infrastructure Improvements - 2024

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0844	0.0000	0.0844	0.0331	0.0000	0.0331	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0469	0.4741	0.4065	9.9000e-004		0.0198	0.0198		0.0183	0.0183	0.0000	86.7491	86.7491	0.0281	0.0000	87.4506
Total	**0.0469**	**0.4741**	**0.4065**	**9.9000e-004**	**0.0844**	**0.0198**	**0.1043**	**0.0331**	**0.0183**	**0.0513**	**0.0000**	**86.7491**	**86.7491**	**0.0281**	**0.0000**	**87.4506**

cont'd
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Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.4000e-004	1.0000e-004	1.3200e-003	0.0000	4.9000e-004	0.0000	5.0000e-004	1.3000e-004	0.0000	1.3000e-004	0.0000	0.3642	0.3642	1.0000e-005	1.0000e-005	0.3672
Total	**1.4000e-004**	**1.0000e-004**	**1.3200e-003**	**0.0000**	**4.9000e-004**	**0.0000**	**5.0000e-004**	**1.3000e-004**	**0.0000**	**1.3000e-004**	**0.0000**	**0.3642**	**0.3642**	**1.0000e-005**	**1.0000e-005**	**0.3672**

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Infrastructure Improvements - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0332	0.0000	0.0332	4.9200e-003	0.0000	4.9200e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	2.4400e-003	0.0240	0.0219	5.0000e-005		9.8000e-004	9.8000e-004		9.0000e-004	9.0000e-004	0.0000	4.8200	4.8200	1.5600e-003	0.0000	4.8589
Total	**2.4400e-003**	**0.0240**	**0.0219**	**5.0000e-005**	**0.0332**	**9.8000e-004**	**0.0342**	**4.9200e-003**	**9.0000e-004**	**5.8200e-003**	**0.0000**	**4.8200**	**4.8200**	**1.5600e-003**	**0.0000**	**4.8589**

cont'd
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Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.0000e-005	0.0000	7.0000e-005	0.0000	3.0000e-005	0.0000	3.0000e-005	1.0000e-005	0.0000	1.0000e-005	0.0000	0.0196	0.0196	0.0000	0.0000	0.0197
Total	**1.0000e-005**	**0.0000**	**7.0000e-005**	**0.0000**	**3.0000e-005**	**0.0000**	**3.0000e-005**	**1.0000e-005**	**0.0000**	**1.0000e-005**	**0.0000**	**0.0196**	**0.0196**	**0.0000**	**0.0000**	**0.0197**

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Infrastructure Improvements - 2025

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0332	0.0000	0.0332	4.9200e-003	0.0000	4.9200e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	2.4400e-003	0.0240	0.0219	5.0000e-005		9.8000e-004	9.8000e-004		9.0000e-004	9.0000e-004	0.0000	4.8200	4.8200	1.5600e-003	0.0000	4.8589
Total	**2.4400e-003**	**0.0240**	**0.0219**	**5.0000e-005**	**0.0332**	**9.8000e-004**	**0.0342**	**4.9200e-003**	**9.0000e-004**	**5.8200e-003**	**0.0000**	**4.8200**	**4.8200**	**1.5600e-003**	**0.0000**	**4.8589**

cont'd
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Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.0000e-005	0.0000	7.0000e-005	0.0000	3.0000e-005	0.0000	3.0000e-005	1.0000e-005	0.0000	1.0000e-005	0.0000	0.0196	0.0196	0.0000	0.0000	0.0197
Total	**1.0000e-005**	**0.0000**	**7.0000e-005**	**0.0000**	**3.0000e-005**	**0.0000**	**3.0000e-005**	**1.0000e-005**	**0.0000**	**1.0000e-005**	**0.0000**	**0.0196**	**0.0196**	**0.0000**	**0.0000**	**0.0197**

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.5 Building Construction - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1306	1.1909	1.5361	2.5700e-003		0.0504	0.0504		0.0474	0.0474	0.0000	221.4831	221.4831	0.0521	0.0000	222.7847
Total	**0.1306**	**1.1909**	**1.5361**	**2.5700e-003**		**0.0504**	**0.0504**		**0.0474**	**0.0474**	**0.0000**	**221.4831**	**221.4831**	**0.0521**	**0.0000**	**222.7847**

Unmitigated Construction Off-Site

cont'd
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	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	6.5300e-003	0.2111	0.0829	1.0500e-003	0.0392	1.7600e-003	0.0410	0.0113	1.6800e-003	0.0130	0.0000	101.0205	101.0205	1.1300e-003	0.0149	105.4844
Worker	0.0449	0.0304	0.4321	1.3500e-003	0.1742	7.5000e-004	0.1750	0.0463	6.9000e-004	0.0470	0.0000	123.9605	123.9605	2.7100e-003	3.0500e-003	124.9367
Total	**0.0514**	**0.2415**	**0.5150**	**2.4000e-003**	**0.2135**	**2.5100e-003**	**0.2160**	**0.0576**	**2.3700e-003**	**0.0600**	**0.0000**	**224.9811**	**224.9811**	**3.8400e-003**	**0.0179**	**230.4211**

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.5 Building Construction - 2025

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1306	1.1909	1.5361	2.5700e-003		0.0504	0.0504		0.0474	0.0474	0.0000	221.4828	221.4828	0.0521	0.0000	222.7844
Total	**0.1306**	**1.1909**	**1.5361**	**2.5700e-003**		**0.0504**	**0.0504**		**0.0474**	**0.0474**	**0.0000**	**221.4828**	**221.4828**	**0.0521**	**0.0000**	**222.7844**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	6.5300e-003	0.2111	0.0829	1.0500e-003	0.0392	1.7600e-003	0.0410	0.0113	1.6800e-003	0.0130	0.0000	101.0205	101.0205	1.1300e-003	0.0149	105.4844
Worker	0.0449	0.0304	0.4321	1.3500e-003	0.1742	7.5000e-004	0.1750	0.0463	6.9000e-004	0.0470	0.0000	123.9605	123.9605	2.7100e-003	3.0500e-003	124.9367
Total	**0.0514**	**0.2415**	**0.5150**	**2.4000e-003**	**0.2135**	**2.5100e-003**	**0.2160**	**0.0576**	**2.3700e-003**	**0.0600**	**0.0000**	**224.9811**	**224.9811**	**3.8400e-003**	**0.0179**	**230.4211**

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.6 Paving - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	5.9500e-003	0.0558	0.0948	1.5000e-004		2.7200e-003	2.7200e-003		2.5000e-003	2.5000e-003	0.0000	13.0125	13.0125	4.2100e-003	0.0000	13.1177
Paving	4.1800e-003					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0101**	**0.0558**	**0.0948**	**1.5000e-004**		**2.7200e-003**	**2.7200e-003**		**2.5000e-003**	**2.5000e-003**	**0.0000**	**13.0125**	**13.0125**	**4.2100e-003**	**0.0000**	**13.1177**

cont'd
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Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.8000e-004	1.9000e-004	2.6600e-003	1.0000e-005	1.0700e-003	0.0000	1.0800e-003	2.8000e-004	0.0000	2.9000e-004	0.0000	0.7624	0.7624	2.0000e-005	2.0000e-005	0.7684
Total	**2.8000e-004**	**1.9000e-004**	**2.6600e-003**	**1.0000e-005**	**1.0700e-003**	**0.0000**	**1.0800e-003**	**2.8000e-004**	**0.0000**	**2.9000e-004**	**0.0000**	**0.7624**	**0.7624**	**2.0000e-005**	**2.0000e-005**	**0.7684**

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.6 Paving - 2025

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	5.9500e-003	0.0558	0.0948	1.5000e-004		2.7200e-003	2.7200e-003		2.5000e-003	2.5000e-003	0.0000	13.0125	13.0125	4.2100e-003	0.0000	13.1177
Paving	4.1800e-003					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0101**	**0.0558**	**0.0948**	**1.5000e-004**		**2.7200e-003**	**2.7200e-003**		**2.5000e-003**	**2.5000e-003**	**0.0000**	**13.0125**	**13.0125**	**4.2100e-003**	**0.0000**	**13.1177**

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Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.8000e-004	1.9000e-004	2.6600e-003	1.0000e-005	1.0700e-003	0.0000	1.0800e-003	2.8000e-004	0.0000	2.9000e-004	0.0000	0.7624	0.7624	2.0000e-005	2.0000e-005	0.7684
Total	**2.8000e-004**	**1.9000e-004**	**2.6600e-003**	**1.0000e-005**	**1.0700e-003**	**0.0000**	**1.0800e-003**	**2.8000e-004**	**0.0000**	**2.9000e-004**	**0.0000**	**0.7624**	**0.7624**	**2.0000e-005**	**2.0000e-005**	**0.7684**

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.7 Architectural Coating - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	1.8981					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	1.1100e-003	7.4500e-003	0.0118	2.0000e-005		3.3000e-004	3.3000e-004		3.3000e-004	3.3000e-004	0.0000	1.6596	1.6596	9.0000e-005	0.0000	1.6619
Total	**1.8992**	**7.4500e-003**	**0.0118**	**2.0000e-005**		**3.3000e-004**	**3.3000e-004**		**3.3000e-004**	**3.3000e-004**	**0.0000**	**1.6596**	**1.6596**	**9.0000e-005**	**0.0000**	**1.6619**

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Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	6.1000e-004	4.1000e-004	5.8500e-003	2.0000e-005	2.3600e-003	1.0000e-005	2.3700e-003	6.3000e-004	1.0000e-005	6.4000e-004	0.0000	1.6773	1.6773	4.0000e-005	4.0000e-005	1.6905
Total	**6.1000e-004**	**4.1000e-004**	**5.8500e-003**	**2.0000e-005**	**2.3600e-003**	**1.0000e-005**	**2.3700e-003**	**6.3000e-004**	**1.0000e-005**	**6.4000e-004**	**0.0000**	**1.6773**	**1.6773**	**4.0000e-005**	**4.0000e-005**	**1.6905**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.7 Architectural Coating - 2025

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	1.8981					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	1.1100e-003	7.4500e-003	0.0118	2.0000e-005		3.3000e-004	3.3000e-004		3.3000e-004	3.3000e-004	0.0000	1.6596	1.6596	9.0000e-005	0.0000	1.6619
Total	**1.8992**	**7.4500e-003**	**0.0118**	**2.0000e-005**		**3.3000e-004**	**3.3000e-004**		**3.3000e-004**	**3.3000e-004**	**0.0000**	**1.6596**	**1.6596**	**9.0000e-005**	**0.0000**	**1.6619**

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Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	6.1000e-004	4.1000e-004	5.8500e-003	2.0000e-005	2.3600e-003	1.0000e-005	2.3700e-003	6.3000e-004	1.0000e-005	6.4000e-004	0.0000	1.6773	1.6773	4.0000e-005	4.0000e-005	1.6905
Total	**6.1000e-004**	**4.1000e-004**	**5.8500e-003**	**2.0000e-005**	**2.3600e-003**	**1.0000e-005**	**2.3700e-003**	**6.3000e-004**	**1.0000e-005**	**6.4000e-004**	**0.0000**	**1.6773**	**1.6773**	**4.0000e-005**	**4.0000e-005**	**1.6905**

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.0968	0.1643	1.0761	2.7000e-003	0.2987	2.1500e-003	0.3009	0.0798	2.0200e-003	0.0818	0.0000	249.9673	249.9673	0.0120	0.0120	253.8281
Unmitigated	0.0968	0.1643	1.0761	2.7000e-003	0.2987	2.1500e-003	0.3009	0.0798	2.0200e-003	0.0818	0.0000	249.9673	249.9673	0.0120	0.0120	253.8281

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4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
General Office Building	0.00	0.00	0.00		
Parking Lot	0.00	0.00	0.00		
Unrefrigerated Warehouse-No Rail	184.32	184.32	184.32	789,943	789,943
Total	184.32	184.32	184.32	789,943	789,943

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
General Office Building	16.60	8.40	6.90	33.00	48.00	19.00	77	19	4
Parking Lot	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0
Unrefrigerated Warehouse-No	16.60	8.40	6.90	59.00	0.00	41.00	92	5	3

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
General Office Building	0.540541	0.056458	0.173793	0.136090	0.025268	0.007074	0.011525	0.018705	0.000610	0.000304	0.023606	0.001094	0.004932
Parking Lot	0.540541	0.056458	0.173793	0.136090	0.025268	0.007074	0.011525	0.018705	0.000610	0.000304	0.023606	0.001094	0.004932
Unrefrigerated Warehouse-No Rail	0.540541	0.056458	0.173793	0.136090	0.025268	0.007074	0.011525	0.018705	0.000610	0.000304	0.023606	0.001094	0.004932

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

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	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	180.9146	180.9146	0.0153	1.8500e-003	181.8479
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	180.9146	180.9146	0.0153	1.8500e-003	181.8479
NaturalGas Mitigated	4.4200e-003	0.0402	0.0338	2.4000e-004		3.0600e-003	3.0600e-003		3.0600e-003	3.0600e-003	0.0000	43.7779	43.7779	8.4000e-004	8.0000e-004	44.0380
NaturalGas Unmitigated	4.4200e-003	0.0402	0.0338	2.4000e-004		3.0600e-003	3.0600e-003		3.0600e-003	3.0600e-003	0.0000	43.7779	43.7779	8.4000e-004	8.0000e-004	44.0380

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
General Office Building	48020	2.6000e-004	2.3500e-003	1.9800e-003	1.0000e-005		1.8000e-004	1.8000e-004		1.8000e-004	1.8000e-004	0.0000	2.5625	2.5625	5.0000e-005	5.0000e-005	2.5778
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	772347	4.1600e-003	0.0379	0.0318	2.3000e-004		2.8800e-003	2.8800e-003		2.8800e-003	2.8800e-003	0.0000	41.2154	41.2154	7.9000e-004	7.6000e-004	41.4603
Total		**4.4200e-003**	**0.0402**	**0.0338**	**2.4000e-004**		**3.0600e-003**	**3.0600e-003**		**3.0600e-003**	**3.0600e-003**	**0.0000**	**43.7779**	**43.7779**	**8.4000e-004**	**8.1000e-004**	**44.0380**

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
General Office Building	48020	2.6000e-004	2.3500e-003	1.9800e-003	1.0000e-005		1.8000e-004	1.8000e-004		1.8000e-004	1.8000e-004	0.0000	2.5625	2.5625	5.0000e-005	5.0000e-005	2.5778
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	772347	4.1600e-003	0.0379	0.0318	2.3000e-004		2.8800e-003	2.8800e-003		2.8800e-003	2.8800e-003	0.0000	41.2154	41.2154	7.9000e-004	7.6000e-004	41.4603
Total		**4.4200e-003**	**0.0402**	**0.0338**	**2.4000e-004**		**3.0600e-003**	**3.0600e-003**		**3.0600e-003**	**3.0600e-003**	**0.0000**	**43.7779**	**43.7779**	**8.4000e-004**	**8.1000e-004**	**44.0380**

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Northern Gateway Logistics Center - Riverside-South Coast County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
General Office Building	128660	22.8173	1.9300e-003	2.3000e-004	22.9350
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	891465	158.0973	0.0133	1.6200e-003	158.9129
Total		**180.9146**	**0.0153**	**1.8500e-003**	**181.8479**

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Northern Gateway Logistics Center - Riverside-South Coast County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.3 Energy by Land Use - Electricity

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
General Office Building	128660	22.8173	1.9300e-003	2.3000e-004	22.9350
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	891465	158.0973	0.0133	1.6200e-003	158.9129
Total		**180.9146**	**0.0153**	**1.8500e-003**	**181.8479**

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6.0 Area Detail

6.1 Mitigation Measures Area

Northern Gateway Logistics Center - Riverside-South Coast County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	1.6246	9.0000e-005	9.5700e-003	0.0000		3.0000e-005	3.0000e-005		3.0000e-005	3.0000e-005	0.0000	0.0187	0.0187	5.0000e-005	0.0000	0.0199
Unmitigated	1.6246	9.0000e-005	9.5700e-003	0.0000		3.0000e-005	3.0000e-005		3.0000e-005	3.0000e-005	0.0000	0.0187	0.0187	5.0000e-005	0.0000	0.0199

6.2 Area by SubCategory

Unmitigated

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	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.1846					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	1.4391					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	8.8000e-004	9.0000e-005	9.5700e-003	0.0000		3.0000e-005	3.0000e-005		3.0000e-005	3.0000e-005	0.0000	0.0187	0.0187	5.0000e-005	0.0000	0.0199
Total	**1.6246**	**9.0000e-005**	**9.5700e-003**	**0.0000**		**3.0000e-005**	**3.0000e-005**		**3.0000e-005**	**3.0000e-005**	**0.0000**	**0.0187**	**0.0187**	**5.0000e-005**	**0.0000**	**0.0199**

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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.1846					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	1.4391					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	8.8000e-004	9.0000e-005	9.5700e-003	0.0000		3.0000e-005	3.0000e-005		3.0000e-005	3.0000e-005	0.0000	0.0187	0.0187	5.0000e-005	0.0000	0.0199
Total	**1.6246**	**9.0000e-005**	**9.5700e-003**	**0.0000**		**3.0000e-005**	**3.0000e-005**		**3.0000e-005**	**3.0000e-005**	**0.0000**	**0.0187**	**0.0187**	**5.0000e-005**	**0.0000**	**0.0199**

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7.0 Water Detail

7.1 Mitigation Measures Water

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	242.7741	2.9927	0.0724	339.1736
Unmitigated	242.7741	2.9927	0.0724	339.1736

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
General Office Building	2.48827 / 1.52507	9.5402	0.0818	2.0000e-003	12.1829
Parking Lot	0 / 0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	88.8 / 0.001669	233.2338	2.9109	0.0704	326.9907
Total		**242.7741**	**2.9927**	**0.0724**	**339.1736**

cont'd
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EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
General Office Building	2.48827 / 1.52507	9.5402	0.0818	2.0000e-003	12.1829
Parking Lot	0 / 0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	88.8 / 0.001669	233.2338	2.9109	0.0704	326.9907
Total		**242.7741**	**2.9927**	**0.0724**	**339.1736**

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8.0 Waste Detail

8.1 Mitigation Measures Waste

Northern Gateway Logistics Center - Riverside-South Coast County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	75.9146	4.4864	0.0000	188.0751
Unmitigated	75.9146	4.4864	0.0000	188.0751

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
General Office Building	13.02	2.6429	0.1562	0.0000	6.5478
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	360.96	73.2716	4.3302	0.0000	181.5273
Total		**75.9146**	**4.4864**	**0.0000**	**188.0751**

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Northern Gateway Logistics Center - Riverside-South Coast County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

8.2 Waste by Land Use

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
General Office Building	13.02	2.6429	0.1562	0.0000	6.5478
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	360.96	73.2716	4.3302	0.0000	181.5273
Total		**75.9146**	**4.4864**	**0.0000**	**188.0751**

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9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

11.0 Vegetation

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Northern Gateway Logistics Center - Riverside-South Coast County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Northern Gateway Logistics Center

Riverside-South Coast County, Summer

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Office Building	14.00	1000sqft	0.32	14,000.00	0
Unrefrigerated Warehouse-No Rail	384.00	1000sqft	11.20	384,252.00	0
Parking Lot	354.00	Space	3.19	0.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.4	**Precipitation Freq (Days)**	28
Climate Zone	10			**Operational Year**	2025
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	390.98	**CH4 Intensity (lb/MWhr)**	0.033	**N2O Intensity (lb/MWhr)**	0.004

1.3 User Entered Comments & Non-Default Data

Project Characteristics - Consistent with DEIR's model.

Land Use - Consistent with DEIR's model.

Construction Phase - See comment on: "Unsubstantiated Changes to Individual Construction Phase Lengths".

Off-road Equipment - Consistent with DEIR's model.

Off-road Equipment - Consistent with DEIR's model.

Off-road Equipment - Consistent with DEIR's model.

Off-road Equipment - Consistent with DEIR's model.

Trips and VMT - Consistent with DEIR"s model.

Grading - Consistent with DEIR's model.

Architectural Coating - Consistent with DEIR"s model.

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Northern Gateway Logistics Center - Riverside-South Coast County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Vehicle Trips - Consistent with DEIR's model.

Energy Use - Consistent with DEIR's model.

Water And Wastewater - Consistent with DEIR's model.

Table Name	Column Name	Default Value	New Value
tblArchitecturalCoating	ConstArea_Parking	0.00	22,504.00
tblConstructionPhase	NumDays	10.00	6.00
tblConstructionPhase	NumDays	30.00	19.00
tblConstructionPhase	NumDays	30.00	19.00
tblConstructionPhase	NumDays	300.00	191.00
tblConstructionPhase	NumDays	20.00	13.00
tblConstructionPhase	NumDays	20.00	13.00
tblConstructionPhase	PhaseEndDate	11/14/2024	11/8/2024
tblConstructionPhase	PhaseEndDate	12/26/2024	12/5/2024
tblConstructionPhase	PhaseEndDate	2/6/2025	1/1/2025
tblConstructionPhase	PhaseEndDate	4/2/2026	9/25/2025
tblConstructionPhase	PhaseEndDate	4/30/2026	10/14/2025
tblConstructionPhase	PhaseEndDate	5/28/2026	10/31/2025
tblConstructionPhase	PhaseStartDate	11/15/2024	11/9/2024
tblConstructionPhase	PhaseStartDate	12/27/2024	12/6/2024
tblConstructionPhase	PhaseStartDate	2/7/2025	1/2/2025
tblConstructionPhase	PhaseStartDate	4/3/2026	9/26/2025
tblConstructionPhase	PhaseStartDate	5/1/2026	10/15/2025
tblGrading	AcresOfGrading	57.00	258.00
tblGrading	AcresOfGrading	9.00	64.50
tblGrading	MaterialExported	0.00	1,519.00
tblLandUse	LandUseSquareFeet	384,000.00	384,252.00
tblLandUse	LandUseSquareFeet	141,600.00	0.00
tblLandUse	LotAcreage	8.82	11.20

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Northern Gateway Logistics Center - Riverside-South Coast County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

tblOffRoadEquipment	HorsePower	158.00	84.00
tblOffRoadEquipment	HorsePower	78.00	367.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	4.00
tblTripsAndVMT	HaulingTripNumber	150.00	2.92
tblTripsAndVMT	WorkerTripNumber	33.00	5.00
tblVehicleTrips	ST_TR	2.21	0.00
tblVehicleTrips	ST_TR	1.74	0.48
tblVehicleTrips	SU_TR	0.70	0.00
tblVehicleTrips	SU_TR	1.74	0.48
tblVehicleTrips	WD_TR	9.74	0.00
tblVehicleTrips	WD_TR	1.74	0.48
tblWater	OutdoorWaterUseRate	0.00	1,669.00

2.0 Emissions Summary

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Northern Gateway Logistics Center - Riverside-South Coast County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2024	5.2243	52.6897	45.3338	0.1102	29.6678	2.2039	30.8981	11.2150	2.0276	12.3468	0.0000	10,673.0693	10,673.0693	3.4374	5.8000e-003	10,759.3283
2025	292.2836	47.9282	43.9872	0.1102	9.2595	1.9671	11.2266	3.6686	1.8097	5.4783	0.0000	10,672.6823	10,672.6823	3.4377	0.2053	10,758.9272
Maximum	**292.2836**	**52.6897**	**45.3338**	**0.1102**	**29.6678**	**2.2039**	**30.8981**	**11.2150**	**2.0276**	**12.3468**	**0.0000**	**10,673.0693**	**10,673.0693**	**3.4377**	**0.2053**	**10,759.3283**

cont'd
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Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2024	5.2243	52.6897	45.3338	0.1102	29.6678	2.2039	30.8981	11.2150	2.0276	12.3468	0.0000	10,673.0693	10,673.0693	3.4374	5.8000e-003	10,759.3283
2025	292.2836	47.9282	43.9872	0.1102	9.2595	1.9671	11.2266	3.6686	1.8097	5.4783	0.0000	10,672.6823	10,672.6823	3.4377	0.2053	10,758.9272
Maximum	**292.2836**	**52.6897**	**45.3338**	**0.1102**	**29.6678**	**2.2039**	**30.8981**	**11.2150**	**2.0276**	**12.3468**	**0.0000**	**10,673.0693**	**10,673.0693**	**3.4377**	**0.2053**	**10,759.3283**

Northern Gateway Logistics Center - Riverside-South Coast County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

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Northern Gateway Logistics Center - Riverside-South Coast County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	8.9039	6.9000e-004	0.0766	1.0000e-005		2.7000e-004	2.7000e-004		2.7000e-004	2.7000e-004		0.1646	0.1646	4.3000e-004		0.1753
Energy	0.0242	0.2204	0.1851	1.3200e-003		0.0168	0.0168		0.0168	0.0168		264.4211	264.4211	5.0700e-003	4.8500e-003	265.9924
Mobile	0.6083	0.8447	6.5138	0.0158	1.6688	0.0118	1.6806	0.4452	0.0111	0.4563		1,604.8999	1,604.8999	0.0717	0.0705	1,627.7083
Total	**9.5364**	**1.0657**	**6.7755**	**0.0171**	**1.6688**	**0.0288**	**1.6977**	**0.4452**	**0.0281**	**0.4733**		**1,869.4856**	**1,869.4856**	**0.0772**	**0.0754**	**1,893.8760**

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Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	8.9039	6.9000e-004	0.0766	1.0000e-005		2.7000e-004	2.7000e-004		2.7000e-004	2.7000e-004		0.1646	0.1646	4.3000e-004		0.1753
Energy	0.0242	0.2204	0.1851	1.3200e-003		0.0168	0.0168		0.0168	0.0168		264.4211	264.4211	5.0700e-003	4.8500e-003	265.9924
Mobile	0.6083	0.8447	6.5138	0.0158	1.6688	0.0118	1.6806	0.4452	0.0111	0.4563		1,604.8999	1,604.8999	0.0717	0.0705	1,627.7083
Total	**9.5364**	**1.0657**	**6.7755**	**0.0171**	**1.6688**	**0.0288**	**1.6977**	**0.4452**	**0.0281**	**0.4733**		**1,869.4856**	**1,869.4856**	**0.0772**	**0.0754**	**1,893.8760**

Northern Gateway Logistics Center - Riverside-South Coast County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Site Preparation	Site Preparation	11/1/2024	11/8/2024	5	6	
2	Grading	Grading	11/9/2024	12/5/2024	5	19	
3	Infrastructure Improvements	Grading	12/6/2024	1/1/2025	5	19	
4	Building Construction	Building Construction	1/2/2025	9/25/2025	5	191	
5	Paving	Paving	9/26/2025	10/14/2025	5	13	
6	Architectural Coating	Architectural Coating	10/15/2025	10/31/2025	5	13	

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Acres of Grading (Site Preparation Phase): 64.5

Acres of Grading (Grading Phase): 258

Acres of Paving: 3.19

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 597,378; Non-Residential Outdoor: 199,126; Striped Parking Area: 22,504 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40

Northern Gateway Logistics Center - Riverside-South Coast County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Grading	Scrapers	2	8.00	367	0.48
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Infrastructure Improvements	Excavators	4	8.00	84	0.38
Infrastructure Improvements	Trenchers	3	8.00	367	0.50
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Architectural Coating	Air Compressors	1	6.00	78	0.48
Infrastructure Improvements	Graders	1	8.00	187	0.41
Infrastructure Improvements	Rubber Tired Dozers	1	8.00	247	0.40
Infrastructure Improvements	Scrapers	2	8.00	367	0.48
Infrastructure Improvements	Tractors/Loaders/Backhoes	2	8.00	97	0.37

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Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Site Preparation	7	18.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	0.00	2.92	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Infrastructure Improvements	13	5.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	166.00	65.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	33.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Northern Gateway Logistics Center - Riverside-South Coast County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Site Preparation - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					29.4666	0.0000	29.4666	11.1617	0.0000	11.1617			0.0000			0.0000
Off-Road	2.6609	27.1760	18.3356	0.0381		1.2294	1.2294		1.1310	1.1310		3,688.0100	3,688.0100	1.1928		3,717.8294
Total	**2.6609**	**27.1760**	**18.3356**	**0.0381**	**29.4666**	**1.2294**	**30.6960**	**11.1617**	**1.1310**	**12.2927**		**3,688.0100**	**3,688.0100**	**1.1928**		**3,717.8294**

cont'd
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Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0613	0.0362	0.6156	1.7100e-003	0.2012	9.0000e-004	0.2021	0.0534	8.3000e-004	0.0542		173.1792	173.1792	3.7500e-003	3.9200e-003	174.4420
Total	**0.0613**	**0.0362**	**0.6156**	**1.7100e-003**	**0.2012**	**9.0000e-004**	**0.2021**	**0.0534**	**8.3000e-004**	**0.0542**		**173.1792**	**173.1792**	**3.7500e-003**	**3.9200e-003**	**174.4420**

Northern Gateway Logistics Center - Riverside-South Coast County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Site Preparation - 2024

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					29.4666	0.0000	29.4666	11.1617	0.0000	11.1617			0.0000			0.0000
Off-Road	2.6609	27.1760	18.3356	0.0381		1.2294	1.2294		1.1310	1.1310	0.0000	3,688.0100	3,688.0100	1.1928		3,717.8294
Total	**2.6609**	**27.1760**	**18.3356**	**0.0381**	**29.4666**	**1.2294**	**30.6960**	**11.1617**	**1.1310**	**12.2927**	**0.0000**	**3,688.0100**	**3,688.0100**	**1.1928**		**3,717.8294**

cont'd
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Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0613	0.0362	0.6156	1.7100e-003	0.2012	9.0000e-004	0.2021	0.0534	8.3000e-004	0.0542		173.1792	173.1792	3.7500e-003	3.9200e-003	174.4420
Total	**0.0613**	**0.0362**	**0.6156**	**1.7100e-003**	**0.2012**	**9.0000e-004**	**0.2021**	**0.0534**	**8.3000e-004**	**0.0542**		**173.1792**	**173.1792**	**3.7500e-003**	**3.9200e-003**	**174.4420**

Northern Gateway Logistics Center - Riverside-South Coast County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Grading - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					20.4226	0.0000	20.4226	4.8651	0.0000	4.8651			0.0000			0.0000
Off-Road	3.2181	32.3770	27.7228	0.0621		1.3354	1.3354		1.2286	1.2286		6,009.7487	6,009.7487	1.9437		6,058.3405
Total	**3.2181**	**32.3770**	**27.7228**	**0.0621**	**20.4226**	**1.3354**	**21.7580**	**4.8651**	**1.2286**	**6.0937**		**6,009.7487**	**6,009.7487**	**1.9437**		**6,058.3405**

cont'd
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Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	3.4000e-004	0.0158	4.3800e-003	9.0000e-005	2.7100e-003	1.9000e-004	2.9000e-003	7.4000e-004	1.8000e-004	9.2000e-004		9.1138	9.1138	1.4000e-004	1.4400e-003	9.5454
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0681	0.0402	0.6840	1.9000e-003	0.2236	1.0000e-003	0.2246	0.0593	9.2000e-004	0.0602		192.4214	192.4214	4.1600e-003	4.3600e-003	193.8244
Total	**0.0684**	**0.0560**	**0.6884**	**1.9900e-003**	**0.2263**	**1.1900e-003**	**0.2275**	**0.0600**	**1.1000e-003**	**0.0611**		**201.5352**	**201.5352**	**4.3000e-003**	**5.8000e-003**	**203.3698**

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Grading - 2024

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					20.4226	0.0000	20.4226	4.8651	0.0000	4.8651			0.0000			0.0000
Off-Road	3.2181	32.3770	27.7228	0.0621		1.3354	1.3354		1.2286	1.2286	0.0000	6,009.7487	6,009.7487	1.9437		6,058.3405
Total	**3.2181**	**32.3770**	**27.7228**	**0.0621**	**20.4226**	**1.3354**	**21.7580**	**4.8651**	**1.2286**	**6.0937**	**0.0000**	**6,009.7487**	**6,009.7487**	**1.9437**		**6,058.3405**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	3.4000e-004	0.0158	4.3800e-003	9.0000e-005	2.7100e-003	1.9000e-004	2.9000e-003	7.4000e-004	1.8000e-004	9.2000e-004		9.1138	9.1138	1.4000e-004	1.4400e-003	9.5454
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0681	0.0402	0.6840	1.9000e-003	0.2236	1.0000e-003	0.2246	0.0593	9.2000e-004	0.0602		192.4214	192.4214	4.1600e-003	4.3600e-003	193.8244
Total	**0.0684**	**0.0560**	**0.6884**	**1.9900e-003**	**0.2263**	**1.1900e-003**	**0.2275**	**0.0600**	**1.1000e-003**	**0.0611**		**201.5352**	**201.5352**	**4.3000e-003**	**5.8000e-003**	**203.3698**

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Northern Gateway Logistics Center - Riverside-South Coast County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Infrastructure Improvements - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					9.2036	0.0000	9.2036	3.6538	0.0000	3.6538			0.0000			0.0000
Off-Road	5.2073	52.6796	45.1628	0.1098		2.2037	2.2037		2.0274	2.0274		10,624.9640	10,624.9640	3.4363		10,710.8722
Total	**5.2073**	**52.6796**	**45.1628**	**0.1098**	**9.2036**	**2.2037**	**11.4073**	**3.6538**	**2.0274**	**5.6811**		**10,624.9640**	**10,624.9640**	**3.4363**		**10,710.8722**

cont'd
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Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0170	0.0101	0.1710	4.8000e-004	0.0559	2.5000e-004	0.0561	0.0148	2.3000e-004	0.0151		48.1053	48.1053	1.0400e-003	1.0900e-003	48.4561
Total	**0.0170**	**0.0101**	**0.1710**	**4.8000e-004**	**0.0559**	**2.5000e-004**	**0.0561**	**0.0148**	**2.3000e-004**	**0.0151**		**48.1053**	**48.1053**	**1.0400e-003**	**1.0900e-003**	**48.4561**

Northern Gateway Logistics Center - Riverside-South Coast County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Infrastructure Improvements - 2024

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					9.2036	0.0000	9.2036	3.6538	0.0000	3.6538			0.0000			0.0000
Off-Road	5.2073	52.6796	45.1628	0.1098		2.2037	2.2037		2.0274	2.0274	0.0000	10,624.9640	10,624.9640	3.4363		10,710.8722
Total	**5.2073**	**52.6796**	**45.1628**	**0.1098**	**9.2036**	**2.2037**	**11.4073**	**3.6538**	**2.0274**	**5.6811**	**0.0000**	**10,624.9640**	**10,624.9640**	**3.4363**		**10,710.8722**

cont'd
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Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0170	0.0101	0.1710	4.8000e-004	0.0559	2.5000e-004	0.0561	0.0148	2.3000e-004	0.0151		48.1053	48.1053	1.0400e-003	1.0900e-003	48.4561
Total	**0.0170**	**0.0101**	**0.1710**	**4.8000e-004**	**0.0559**	**2.5000e-004**	**0.0561**	**0.0148**	**2.3000e-004**	**0.0151**		**48.1053**	**48.1053**	**1.0400e-003**	**1.0900e-003**	**48.4561**

Northern Gateway Logistics Center - Riverside-South Coast County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Infrastructure Improvements - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					9.2036	0.0000	9.2036	3.6538	0.0000	3.6538			0.0000			0.0000
Off-Road	4.8733	47.9192	43.8281	0.1098		1.9669	1.9669		1.8095	1.8095		10,626.2174	10,626.2174	3.4367		10,712.1358
Total	**4.8733**	**47.9192**	**43.8281**	**0.1098**	**9.2036**	**1.9669**	**11.1705**	**3.6538**	**1.8095**	**5.4633**		**10,626.2174**	**10,626.2174**	**3.4367**		**10,712.1358**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0159	9.0100e-003	0.1590	4.6000e-004	0.0559	2.4000e-004	0.0561	0.0148	2.2000e-004	0.0150		46.4649	46.4649	9.4000e-004	1.0200e-003	46.7914
Total	**0.0159**	**9.0100e-003**	**0.1590**	**4.6000e-004**	**0.0559**	**2.4000e-004**	**0.0561**	**0.0148**	**2.2000e-004**	**0.0150**		**46.4649**	**46.4649**	**9.4000e-004**	**1.0200e-003**	**46.7914**

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Northern Gateway Logistics Center - Riverside-South Coast County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Infrastructure Improvements - 2025

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					9.2036	0.0000	9.2036	3.6538	0.0000	3.6538			0.0000			0.0000
Off-Road	4.8733	47.9192	43.8281	0.1098		1.9669	1.9669		1.8095	1.8095	0.0000	10,626.2174	10,626.2174	3.4367		10,712.1358
Total	**4.8733**	**47.9192**	**43.8281**	**0.1098**	**9.2036**	**1.9669**	**11.1705**	**3.6538**	**1.8095**	**5.4633**	**0.0000**	**10,626.2174**	**10,626.2174**	**3.4367**		**10,712.1358**

cont'd
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Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0159	9.0100e-003	0.1590	4.6000e-004	0.0559	2.4000e-004	0.0561	0.0148	2.2000e-004	0.0150		46.4649	46.4649	9.4000e-004	1.0200e-003	46.7914
Total	**0.0159**	**9.0100e-003**	**0.1590**	**4.6000e-004**	**0.0559**	**2.4000e-004**	**0.0561**	**0.0148**	**2.2000e-004**	**0.0150**		**46.4649**	**46.4649**	**9.4000e-004**	**1.0200e-003**	**46.7914**

Northern Gateway Logistics Center - Riverside-South Coast County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.5 Building Construction - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.3674	12.4697	16.0847	0.0270		0.5276	0.5276		0.4963	0.4963		2,556.4744	2,556.4744	0.6010		2,571.4981
Total	**1.3674**	**12.4697**	**16.0847**	**0.0270**		**0.5276**	**0.5276**		**0.4963**	**0.4963**		**2,556.4744**	**2,556.4744**	**0.6010**		**2,571.4981**

Unmitigated Construction Off-Site

cont'd
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	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0712	2.1063	0.8546	0.0110	0.4163	0.0184	0.4347	0.1199	0.0176	0.1375		1,164.8006	1,164.8006	0.0132	0.1715	1,216.2431
Worker	0.5277	0.2990	5.2798	0.0153	1.8555	7.8500e-003	1.8633	0.4921	7.2300e-003	0.4993		1,542.6348	1,542.6348	0.0311	0.0338	1,553.4748
Total	**0.5989**	**2.4053**	**6.1344**	**0.0262**	**2.2718**	**0.0262**	**2.2980**	**0.6120**	**0.0248**	**0.6368**		**2,707.4354**	**2,707.4354**	**0.0443**	**0.2053**	**2,769.7179**

Northern Gateway Logistics Center - Riverside-South Coast County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.5 Building Construction - 2025

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.3674	12.4697	16.0847	0.0270		0.5276	0.5276		0.4963	0.4963	0.0000	2,556.4744	2,556.4744	0.6010		2,571.4981
Total	**1.3674**	**12.4697**	**16.0847**	**0.0270**		**0.5276**	**0.5276**		**0.4963**	**0.4963**	**0.0000**	**2,556.4744**	**2,556.4744**	**0.6010**		**2,571.4981**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0712	2.1063	0.8546	0.0110	0.4163	0.0184	0.4347	0.1199	0.0176	0.1375		1,164.8006	1,164.8006	0.0132	0.1715	1,216.2431
Worker	0.5277	0.2990	5.2798	0.0153	1.8555	7.8500e-003	1.8633	0.4921	7.2300e-003	0.4993		1,542.6348	1,542.6348	0.0311	0.0338	1,553.4748
Total	**0.5989**	**2.4053**	**6.1344**	**0.0262**	**2.2718**	**0.0262**	**2.2980**	**0.6120**	**0.0248**	**0.6368**		**2,707.4354**	**2,707.4354**	**0.0443**	**0.2053**	**2,769.7179**

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Northern Gateway Logistics Center - Riverside-South Coast County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.6 Paving - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9152	8.5816	14.5780	0.0228		0.4185	0.4185		0.3850	0.3850		2,206.7452	2,206.7452	0.7137		2,224.5878
Paving	0.6429					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**1.5581**	**8.5816**	**14.5780**	**0.0228**		**0.4185**	**0.4185**		**0.3850**	**0.3850**		**2,206.7452**	**2,206.7452**	**0.7137**		**2,224.5878**

cont'd
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Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0477	0.0270	0.4771	1.3800e-003	0.1677	7.1000e-004	0.1684	0.0445	6.5000e-004	0.0451		139.3947	139.3947	2.8100e-003	3.0500e-003	140.3742
Total	**0.0477**	**0.0270**	**0.4771**	**1.3800e-003**	**0.1677**	**7.1000e-004**	**0.1684**	**0.0445**	**6.5000e-004**	**0.0451**		**139.3947**	**139.3947**	**2.8100e-003**	**3.0500e-003**	**140.3742**

Northern Gateway Logistics Center - Riverside-South Coast County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.6 Paving - 2025

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9152	8.5816	14.5780	0.0228		0.4185	0.4185		0.3850	0.3850	0.0000	2,206.7452	2,206.7452	0.7137		2,224.5878
Paving	0.6429					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**1.5581**	**8.5816**	**14.5780**	**0.0228**		**0.4185**	**0.4185**		**0.3850**	**0.3850**	**0.0000**	**2,206.7452**	**2,206.7452**	**0.7137**		**2,224.5878**

cont'd
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Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0477	0.0270	0.4771	1.3800e-003	0.1677	7.1000e-004	0.1684	0.0445	6.5000e-004	0.0451		139.3947	139.3947	2.8100e-003	3.0500e-003	140.3742
Total	**0.0477**	**0.0270**	**0.4771**	**1.3800e-003**	**0.1677**	**7.1000e-004**	**0.1684**	**0.0445**	**6.5000e-004**	**0.0451**		**139.3947**	**139.3947**	**2.8100e-003**	**3.0500e-003**	**140.3742**

Northern Gateway Logistics Center - Riverside-South Coast County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.7 Architectural Coating - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	292.0079					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1709	1.1455	1.8091	2.9700e-003		0.0515	0.0515		0.0515	0.0515		281.4481	281.4481	0.0154		281.8319
Total	**292.1787**	**1.1455**	**1.8091**	**2.9700e-003**		**0.0515**	**0.0515**		**0.0515**	**0.0515**		**281.4481**	**281.4481**	**0.0154**		**281.8319**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.1049	0.0594	1.0496	3.0300e-003	0.3689	1.5600e-003	0.3704	0.0978	1.4400e-003	0.0993		306.6684	306.6684	6.1900e-003	6.7100e-003	308.8233
Total	**0.1049**	**0.0594**	**1.0496**	**3.0300e-003**	**0.3689**	**1.5600e-003**	**0.3704**	**0.0978**	**1.4400e-003**	**0.0993**		**306.6684**	**306.6684**	**6.1900e-003**	**6.7100e-003**	**308.8233**

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Northern Gateway Logistics Center - Riverside-South Coast County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.7 Architectural Coating - 2025

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	292.0079					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1709	1.1455	1.8091	2.9700e-003		0.0515	0.0515		0.0515	0.0515	0.0000	281.4481	281.4481	0.0154		281.8319
Total	**292.1787**	**1.1455**	**1.8091**	**2.9700e-003**		**0.0515**	**0.0515**		**0.0515**	**0.0515**	**0.0000**	**281.4481**	**281.4481**	**0.0154**		**281.8319**

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Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.1049	0.0594	1.0496	3.0300e-003	0.3689	1.5600e-003	0.3704	0.0978	1.4400e-003	0.0993		306.6684	306.6684	6.1900e-003	6.7100e-003	308.8233
Total	**0.1049**	**0.0594**	**1.0496**	**3.0300e-003**	**0.3689**	**1.5600e-003**	**0.3704**	**0.0978**	**1.4400e-003**	**0.0993**		**306.6684**	**306.6684**	**6.1900e-003**	**6.7100e-003**	**308.8233**

Northern Gateway Logistics Center - Riverside-South Coast County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.6083	0.8447	6.5138	0.0158	1.6688	0.0118	1.6806	0.4452	0.0111	0.4563		1,604.8999	1,604.8999	0.0717	0.0705	1,627.7083
Unmitigated	0.6083	0.8447	6.5138	0.0158	1.6688	0.0118	1.6806	0.4452	0.0111	0.4563		1,604.8999	1,604.8999	0.0717	0.0705	1,627.7083

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4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
General Office Building	0.00	0.00	0.00		
Parking Lot	0.00	0.00	0.00		
Unrefrigerated Warehouse-No Rail	184.32	184.32	184.32	789,943	789,943
Total	184.32	184.32	184.32	789,943	789,943

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
General Office Building	16.60	8.40	6.90	33.00	48.00	19.00	77	19	4
Parking Lot	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0
Unrefrigerated Warehouse-No	16.60	8.40	6.90	59.00	0.00	41.00	92	5	3

Northern Gateway Logistics Center - Riverside-South Coast County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
General Office Building	0.540541	0.056458	0.173793	0.136090	0.025268	0.007074	0.011525	0.018705	0.000610	0.000304	0.023606	0.001094	0.004932
Parking Lot	0.540541	0.056458	0.173793	0.136090	0.025268	0.007074	0.011525	0.018705	0.000610	0.000304	0.023606	0.001094	0.004932
Unrefrigerated Warehouse-No Rail	0.540541	0.056458	0.173793	0.136090	0.025268	0.007074	0.011525	0.018705	0.000610	0.000304	0.023606	0.001094	0.004932

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.0242	0.2204	0.1851	1.3200e-003		0.0168	0.0168		0.0168	0.0168		264.4211	264.4211	5.0700e-003	4.8500e-003	265.9924
NaturalGas Unmitigated	0.0242	0.2204	0.1851	1.3200e-003		0.0168	0.0168		0.0168	0.0168		264.4211	264.4211	5.0700e-003	4.8500e-003	265.9924

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Northern Gateway Logistics Center - Riverside-South Coast County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
General Office Building	131.562	1.4200e-003	0.0129	0.0108	8.0000e-005		9.8000e-004	9.8000e-004		9.8000e-004	9.8000e-004		15.4778	15.4778	3.0000e-004	2.8000e-004	15.5698
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	2116.02	0.0228	0.2075	0.1743	1.2400e-003		0.0158	0.0158		0.0158	0.0158		248.9433	248.9433	4.7700e-003	4.5600e-003	250.4226
Total		**0.0242**	**0.2204**	**0.1851**	**1.3200e-003**		**0.0168**	**0.0168**		**0.0168**	**0.0168**		**264.4211**	**264.4211**	**5.0700e-003**	**4.8400e-003**	**265.9924**

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Northern Gateway Logistics Center - Riverside-South Coast County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
General Office Building	0.131562	1.4200e-003	0.0129	0.0108	8.0000e-005		9.8000e-004	9.8000e-004		9.8000e-004	9.8000e-004		15.4778	15.4778	3.0000e-004	2.8000e-004	15.5698
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	2.11602	0.0228	0.2075	0.1743	1.2400e-003		0.0158	0.0158		0.0158	0.0158		248.9433	248.9433	4.7700e-003	4.5600e-003	250.4226
Total		**0.0242**	**0.2204**	**0.1851**	**1.3200e-003**		**0.0168**	**0.0168**		**0.0168**	**0.0168**		**264.4211**	**264.4211**	**5.0700e-003**	**4.8400e-003**	**265.9924**

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6.0 Area Detail

6.1 Mitigation Measures Area

Northern Gateway Logistics Center - Riverside-South Coast County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	8.9039	6.9000e-004	0.0766	1.0000e-005		2.7000e-004	2.7000e-004		2.7000e-004	2.7000e-004		0.1646	0.1646	4.3000e-004		0.1753
Unmitigated	8.9039	6.9000e-004	0.0766	1.0000e-005		2.7000e-004	2.7000e-004		2.7000e-004	2.7000e-004		0.1646	0.1646	4.3000e-004		0.1753

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	1.0115					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	7.8854					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	7.0500e-003	6.9000e-004	0.0766	1.0000e-005		2.7000e-004	2.7000e-004		2.7000e-004	2.7000e-004		0.1646	0.1646	4.3000e-004		0.1753
Total	**8.9039**	**6.9000e-004**	**0.0766**	**1.0000e-005**		**2.7000e-004**	**2.7000e-004**		**2.7000e-004**	**2.7000e-004**		**0.1646**	**0.1646**	**4.3000e-004**		**0.1753**

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Northern Gateway Logistics Center - Riverside-South Coast County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	1.0115					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	7.8854					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	7.0500e-003	6.9000e-004	0.0766	1.0000e-005		2.7000e-004	2.7000e-004		2.7000e-004	2.7000e-004		0.1646	0.1646	4.3000e-004		0.1753
Total	**8.9039**	**6.9000e-004**	**0.0766**	**1.0000e-005**		**2.7000e-004**	**2.7000e-004**		**2.7000e-004**	**2.7000e-004**		**0.1646**	**0.1646**	**4.3000e-004**		**0.1753**

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7.0 Water Detail

7.1 Mitigation Measures Water

Northern Gateway Logistics Center - Riverside-South Coast County, Summer

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

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Northern Gateway Logistics Center - Riverside-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Northern Gateway Logistics Center

Riverside-South Coast County, Winter

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Office Building	14.00	1000sqft	0.32	14,000.00	0
Unrefrigerated Warehouse-No Rail	384.00	1000sqft	11.20	384,252.00	0
Parking Lot	354.00	Space	3.19	0.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.4	**Precipitation Freq (Days)**	28
Climate Zone	10			**Operational Year**	2025
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	390.98	**CH4 Intensity (lb/MWhr)**	0.033	**N2O Intensity (lb/MWhr)**	0.004

1.3 User Entered Comments & Non-Default Data

Project Characteristics - Consistent with DEIR's model.

Land Use - Consistent with DEIR's model.

Construction Phase - See comment on: "Unsubstantiated Changes to Individual Construction Phase Lengths".

Off-road Equipment - Consistent with DEIR's model.

Off-road Equipment - Consistent with DEIR's model.

Off-road Equipment - Consistent with DEIR's model.

Off-road Equipment - Consistent with DEIR's model.

Trips and VMT - Consistent with DEIR"s model.

Grading - Consistent with DEIR's model.

Architectural Coating - Consistent with DEIR"s model.

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Northern Gateway Logistics Center - Riverside-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Vehicle Trips - Consistent with DEIR's model.

Energy Use - Consistent with DEIR's model.

Water And Wastewater - Consistent with DEIR's model.

Table Name	Column Name	Default Value	New Value
tblArchitecturalCoating	ConstArea_Parking	0.00	22,504.00
tblConstructionPhase	NumDays	10.00	6.00
tblConstructionPhase	NumDays	30.00	19.00
tblConstructionPhase	NumDays	30.00	19.00
tblConstructionPhase	NumDays	300.00	191.00
tblConstructionPhase	NumDays	20.00	13.00
tblConstructionPhase	NumDays	20.00	13.00
tblConstructionPhase	PhaseEndDate	11/14/2024	11/8/2024
tblConstructionPhase	PhaseEndDate	12/26/2024	12/5/2024
tblConstructionPhase	PhaseEndDate	2/6/2025	1/1/2025
tblConstructionPhase	PhaseEndDate	4/2/2026	9/25/2025
tblConstructionPhase	PhaseEndDate	4/30/2026	10/14/2025
tblConstructionPhase	PhaseEndDate	5/28/2026	10/31/2025
tblConstructionPhase	PhaseStartDate	11/15/2024	11/9/2024
tblConstructionPhase	PhaseStartDate	12/27/2024	12/6/2024
tblConstructionPhase	PhaseStartDate	2/7/2025	1/2/2025
tblConstructionPhase	PhaseStartDate	4/3/2026	9/26/2025
tblConstructionPhase	PhaseStartDate	5/1/2026	10/15/2025
tblGrading	AcresOfGrading	57.00	258.00
tblGrading	AcresOfGrading	9.00	64.50
tblGrading	MaterialExported	0.00	1,519.00
tblLandUse	LandUseSquareFeet	384,000.00	384,252.00
tblLandUse	LandUseSquareFeet	141,600.00	0.00
tblLandUse	LotAcreage	8.82	11.20

cont'd
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Northern Gateway Logistics Center - Riverside-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

tblOffRoadEquipment	HorsePower	158.00	84.00
tblOffRoadEquipment	HorsePower	78.00	367.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	4.00
tblTripsAndVMT	HaulingTripNumber	150.00	2.92
tblTripsAndVMT	WorkerTripNumber	33.00	5.00
tblVehicleTrips	ST_TR	2.21	0.00
tblVehicleTrips	ST_TR	1.74	0.48
tblVehicleTrips	SU_TR	0.70	0.00
tblVehicleTrips	SU_TR	1.74	0.48
tblVehicleTrips	WD_TR	9.74	0.00
tblVehicleTrips	WD_TR	1.74	0.48
tblWater	OutdoorWaterUseRate	0.00	1,669.00

2.0 Emissions Summary

cont'd
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Northern Gateway Logistics Center - Riverside-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2024	5.2233	52.6900	45.3017	0.1102	29.6678	2.2039	30.8981	11.2150	2.0276	12.3468	0.0000	10,668.5603	10,668.5603	3.4374	5.9000e-003	10,754.8268
2025	292.2776	47.9286	43.9575	0.1102	9.2595	1.9671	11.2266	3.6686	1.8097	5.4783	0.0000	10,668.3383	10,668.3383	3.4377	0.2066	10,754.5901
Maximum	**292.2776**	**52.6900**	**45.3017**	**0.1102**	**29.6678**	**2.2039**	**30.8981**	**11.2150**	**2.0276**	**12.3468**	**0.0000**	**10,668.5603**	**10,668.5603**	**3.4377**	**0.2066**	**10,754.8268**

cont'd
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Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2024	5.2233	52.6900	45.3017	0.1102	29.6678	2.2039	30.8981	11.2150	2.0276	12.3468	0.0000	10,668.5603	10,668.5603	3.4374	5.9000e-003	10,754.8268
2025	292.2776	47.9286	43.9575	0.1102	9.2595	1.9671	11.2266	3.6686	1.8097	5.4783	0.0000	10,668.3382	10,668.3382	3.4377	0.2066	10,754.5901
Maximum	**292.2776**	**52.6900**	**45.3017**	**0.1102**	**29.6678**	**2.2039**	**30.8981**	**11.2150**	**2.0276**	**12.3468**	**0.0000**	**10,668.5603**	**10,668.5603**	**3.4377**	**0.2066**	**10,754.8268**

Northern Gateway Logistics Center - Riverside-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

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Northern Gateway Logistics Center - Riverside-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	8.9039	6.9000e-004	0.0766	1.0000e-005		2.7000e-004	2.7000e-004		2.7000e-004	2.7000e-004		0.1646	0.1646	4.3000e-004		0.1753
Energy	0.0242	0.2204	0.1851	1.3200e-003		0.0168	0.0168		0.0168	0.0168		264.4211	264.4211	5.0700e-003	4.8500e-003	265.9924
Mobile	0.5257	0.8967	5.7120	0.0146	1.6688	0.0118	1.6806	0.4452	0.0111	0.4563		1,490.3221	1,490.3221	0.0727	0.0720	1,513.5862
Total	**9.4538**	**1.1178**	**5.9737**	**0.0160**	**1.6688**	**0.0289**	**1.6977**	**0.4452**	**0.0281**	**0.4733**		**1,754.9078**	**1,754.9078**	**0.0782**	**0.0768**	**1,779.7539**

cont'd
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Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	8.9039	6.9000e-004	0.0766	1.0000e-005		2.7000e-004	2.7000e-004		2.7000e-004	2.7000e-004		0.1646	0.1646	4.3000e-004		0.1753
Energy	0.0242	0.2204	0.1851	1.3200e-003		0.0168	0.0168		0.0168	0.0168		264.4211	264.4211	5.0700e-003	4.8500e-003	265.9924
Mobile	0.5257	0.8967	5.7120	0.0146	1.6688	0.0118	1.6806	0.4452	0.0111	0.4563		1,490.3221	1,490.3221	0.0727	0.0720	1,513.5862
Total	**9.4538**	**1.1178**	**5.9737**	**0.0160**	**1.6688**	**0.0289**	**1.6977**	**0.4452**	**0.0281**	**0.4733**		**1,754.9078**	**1,754.9078**	**0.0782**	**0.0768**	**1,779.7539**

Northern Gateway Logistics Center - Riverside-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Site Preparation	Site Preparation	11/1/2024	11/8/2024	5	6	
2	Grading	Grading	11/9/2024	12/5/2024	5	19	
3	Infrastructure Improvements	Grading	12/6/2024	1/1/2025	5	19	
4	Building Construction	Building Construction	1/2/2025	9/25/2025	5	191	
5	Paving	Paving	9/26/2025	10/14/2025	5	13	
6	Architectural Coating	Architectural Coating	10/15/2025	10/31/2025	5	13	

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Acres of Grading (Site Preparation Phase): 64.5

Acres of Grading (Grading Phase): 258

Acres of Paving: 3.19

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 597,378; Non-Residential Outdoor: 199,126; Striped Parking Area: 22,504 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40

Northern Gateway Logistics Center - Riverside-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Grading	Scrapers	2	8.00	367	0.48
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Infrastructure Improvements	Excavators	4	8.00	84	0.38
Infrastructure Improvements	Trenchers	3	8.00	367	0.50
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Architectural Coating	Air Compressors	1	6.00	78	0.48
Infrastructure Improvements	Graders	1	8.00	187	0.41
Infrastructure Improvements	Rubber Tired Dozers	1	8.00	247	0.40
Infrastructure Improvements	Scrapers	2	8.00	367	0.48
Infrastructure Improvements	Tractors/Loaders/Backhoes	2	8.00	97	0.37

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Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Site Preparation	7	18.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	0.00	2.92	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Infrastructure Improvements	13	5.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	166.00	65.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	33.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Northern Gateway Logistics Center - Riverside-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Site Preparation - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					29.4666	0.0000	29.4666	11.1617	0.0000	11.1617			0.0000			0.0000
Off-Road	2.6609	27.1760	18.3356	0.0381		1.2294	1.2294		1.1310	1.1310		3,688.0100	3,688.0100	1.1928		3,717.8294
Total	**2.6609**	**27.1760**	**18.3356**	**0.0381**	**29.4666**	**1.2294**	**30.6960**	**11.1617**	**1.1310**	**12.2927**		**3,688.0100**	**3,688.0100**	**1.1928**		**3,717.8294**

cont'd
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Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0576	0.0375	0.5001	1.5500e-003	0.2012	9.0000e-004	0.2021	0.0534	8.3000e-004	0.0542		156.9468	156.9468	3.7400e-003	4.0100e-003	158.2365
Total	**0.0576**	**0.0375**	**0.5001**	**1.5500e-003**	**0.2012**	**9.0000e-004**	**0.2021**	**0.0534**	**8.3000e-004**	**0.0542**		**156.9468**	**156.9468**	**3.7400e-003**	**4.0100e-003**	**158.2365**

Northern Gateway Logistics Center - Riverside-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.2 Site Preparation - 2024

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					29.4666	0.0000	29.4666	11.1617	0.0000	11.1617			0.0000			0.0000
Off-Road	2.6609	27.1760	18.3356	0.0381		1.2294	1.2294		1.1310	1.1310	0.0000	3,688.0100	3,688.0100	1.1928		3,717.8294
Total	**2.6609**	**27.1760**	**18.3356**	**0.0381**	**29.4666**	**1.2294**	**30.6960**	**11.1617**	**1.1310**	**12.2927**	**0.0000**	**3,688.0100**	**3,688.0100**	**1.1928**		**3,717.8294**

cont'd
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Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0576	0.0375	0.5001	1.5500e-003	0.2012	9.0000e-004	0.2021	0.0534	8.3000e-004	0.0542		156.9468	156.9468	3.7400e-003	4.0100e-003	158.2365
Total	**0.0576**	**0.0375**	**0.5001**	**1.5500e-003**	**0.2012**	**9.0000e-004**	**0.2021**	**0.0534**	**8.3000e-004**	**0.0542**		**156.9468**	**156.9468**	**3.7400e-003**	**4.0100e-003**	**158.2365**

Northern Gateway Logistics Center - Riverside-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Grading - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					20.4226	0.0000	20.4226	4.8651	0.0000	4.8651			0.0000			0.0000
Off-Road	3.2181	32.3770	27.7228	0.0621		1.3354	1.3354		1.2286	1.2286		6,009.7487	6,009.7487	1.9437		6,058.3405
Total	**3.2181**	**32.3770**	**27.7228**	**0.0621**	**20.4226**	**1.3354**	**21.7580**	**4.8651**	**1.2286**	**6.0937**		**6,009.7487**	**6,009.7487**	**1.9437**		**6,058.3405**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	3.2000e-004	0.0168	4.4700e-003	9.0000e-005	2.7100e-003	1.9000e-004	2.9000e-003	7.4000e-004	1.8000e-004	9.3000e-004		9.1281	9.1281	1.4000e-004	1.4400e-003	9.5603
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0640	0.0417	0.5557	1.7300e-003	0.2236	1.0000e-003	0.2246	0.0593	9.2000e-004	0.0602		174.3853	174.3853	4.1600e-003	4.4600e-003	175.8183
Total	**0.0643**	**0.0584**	**0.5602**	**1.8200e-003**	**0.2263**	**1.1900e-003**	**0.2275**	**0.0600**	**1.1000e-003**	**0.0611**		**183.5135**	**183.5135**	**4.3000e-003**	**5.9000e-003**	**185.3786**

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Northern Gateway Logistics Center - Riverside-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.3 Grading - 2024

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					20.4226	0.0000	20.4226	4.8651	0.0000	4.8651			0.0000			0.0000
Off-Road	3.2181	32.3770	27.7228	0.0621		1.3354	1.3354		1.2286	1.2286	0.0000	6,009.7487	6,009.7487	1.9437		6,058.3405
Total	**3.2181**	**32.3770**	**27.7228**	**0.0621**	**20.4226**	**1.3354**	**21.7580**	**4.8651**	**1.2286**	**6.0937**	**0.0000**	**6,009.7487**	**6,009.7487**	**1.9437**		**6,058.3405**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	3.2000e-004	0.0168	4.4700e-003	9.0000e-005	2.7100e-003	1.9000e-004	2.9000e-003	7.4000e-004	1.8000e-004	9.3000e-004		9.1281	9.1281	1.4000e-004	1.4400e-003	9.5603
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0640	0.0417	0.5557	1.7300e-003	0.2236	1.0000e-003	0.2246	0.0593	9.2000e-004	0.0602		174.3853	174.3853	4.1600e-003	4.4600e-003	175.8183
Total	**0.0643**	**0.0584**	**0.5602**	**1.8200e-003**	**0.2263**	**1.1900e-003**	**0.2275**	**0.0600**	**1.1000e-003**	**0.0611**		**183.5135**	**183.5135**	**4.3000e-003**	**5.9000e-003**	**185.3786**

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Northern Gateway Logistics Center - Riverside-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Infrastructure Improvements - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					9.2036	0.0000	9.2036	3.6538	0.0000	3.6538			0.0000			0.0000
Off-Road	5.2073	52.6796	45.1628	0.1098		2.2037	2.2037		2.0274	2.0274		10,624.9640	10,624.9640	3.4363		10,710.8722
Total	**5.2073**	**52.6796**	**45.1628**	**0.1098**	**9.2036**	**2.2037**	**11.4073**	**3.6538**	**2.0274**	**5.6811**		**10,624.9640**	**10,624.9640**	**3.4363**		**10,710.8722**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0160	0.0104	0.1389	4.3000e-004	0.0559	2.5000e-004	0.0561	0.0148	2.3000e-004	0.0151		43.5963	43.5963	1.0400e-003	1.1200e-003	43.9546
Total	**0.0160**	**0.0104**	**0.1389**	**4.3000e-004**	**0.0559**	**2.5000e-004**	**0.0561**	**0.0148**	**2.3000e-004**	**0.0151**		**43.5963**	**43.5963**	**1.0400e-003**	**1.1200e-003**	**43.9546**

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Northern Gateway Logistics Center - Riverside-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Infrastructure Improvements - 2024

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					9.2036	0.0000	9.2036	3.6538	0.0000	3.6538			0.0000			0.0000
Off-Road	5.2073	52.6796	45.1628	0.1098		2.2037	2.2037		2.0274	2.0274	0.0000	10,624.9640	10,624.9640	3.4363		10,710.8722
Total	**5.2073**	**52.6796**	**45.1628**	**0.1098**	**9.2036**	**2.2037**	**11.4073**	**3.6538**	**2.0274**	**5.6811**	**0.0000**	**10,624.9640**	**10,624.9640**	**3.4363**		**10,710.8722**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0160	0.0104	0.1389	4.3000e-004	0.0559	2.5000e-004	0.0561	0.0148	2.3000e-004	0.0151		43.5963	43.5963	1.0400e-003	1.1200e-003	43.9546
Total	**0.0160**	**0.0104**	**0.1389**	**4.3000e-004**	**0.0559**	**2.5000e-004**	**0.0561**	**0.0148**	**2.3000e-004**	**0.0151**		**43.5963**	**43.5963**	**1.0400e-003**	**1.1200e-003**	**43.9546**

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Northern Gateway Logistics Center - Riverside-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Infrastructure Improvements - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					9.2036	0.0000	9.2036	3.6538	0.0000	3.6538			0.0000			0.0000
Off-Road	4.8733	47.9192	43.8281	0.1098		1.9669	1.9669		1.8095	1.8095		10,626.2174	10,626.2174	3.4367		10,712.1358
Total	**4.8733**	**47.9192**	**43.8281**	**0.1098**	**9.2036**	**1.9669**	**11.1705**	**3.6538**	**1.8095**	**5.4633**		**10,626.2174**	**10,626.2174**	**3.4367**		**10,712.1358**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0150	9.3400e-003	0.1294	4.2000e-004	0.0559	2.4000e-004	0.0561	0.0148	2.2000e-004	0.0150		42.1208	42.1208	9.4000e-004	1.0400e-003	42.4543
Total	**0.0150**	**9.3400e-003**	**0.1294**	**4.2000e-004**	**0.0559**	**2.4000e-004**	**0.0561**	**0.0148**	**2.2000e-004**	**0.0150**		**42.1208**	**42.1208**	**9.4000e-004**	**1.0400e-003**	**42.4543**

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Northern Gateway Logistics Center - Riverside-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.4 Infrastructure Improvements - 2025

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					9.2036	0.0000	9.2036	3.6538	0.0000	3.6538			0.0000			0.0000
Off-Road	4.8733	47.9192	43.8281	0.1098		1.9669	1.9669		1.8095	1.8095	0.0000	10,626.2174	10,626.2174	3.4367		10,712.1358
Total	**4.8733**	**47.9192**	**43.8281**	**0.1098**	**9.2036**	**1.9669**	**11.1705**	**3.6538**	**1.8095**	**5.4633**	**0.0000**	**10,626.2174**	**10,626.2174**	**3.4367**		**10,712.1358**

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Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0150	9.3400e-003	0.1294	4.2000e-004	0.0559	2.4000e-004	0.0561	0.0148	2.2000e-004	0.0150		42.1208	42.1208	9.4000e-004	1.0400e-003	42.4543
Total	**0.0150**	**9.3400e-003**	**0.1294**	**4.2000e-004**	**0.0559**	**2.4000e-004**	**0.0561**	**0.0148**	**2.2000e-004**	**0.0150**		**42.1208**	**42.1208**	**9.4000e-004**	**1.0400e-003**	**42.4543**

Northern Gateway Logistics Center - Riverside-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.5 Building Construction - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.3674	12.4697	16.0847	0.0270		0.5276	0.5276		0.4963	0.4963		2,556.4744	2,556.4744	0.6010		2,571.4981
Total	**1.3674**	**12.4697**	**16.0847**	**0.0270**		**0.5276**	**0.5276**		**0.4963**	**0.4963**		**2,556.4744**	**2,556.4744**	**0.6010**		**2,571.4981**

Unmitigated Construction Off-Site

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	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0658	2.2340	0.8839	0.0110	0.4163	0.0185	0.4348	0.1199	0.0177	0.1375		1,167.7284	1,167.7284	0.0129	0.1721	1,219.3334
Worker	0.4975	0.3100	4.2948	0.0138	1.8555	7.8500e-003	1.8633	0.4921	7.2300e-003	0.4993		1,398.4119	1,398.4119	0.0312	0.0345	1,409.4842
Total	**0.5633**	**2.5440**	**5.1788**	**0.0248**	**2.2718**	**0.0263**	**2.2981**	**0.6120**	**0.0249**	**0.6368**		**2,566.1403**	**2,566.1403**	**0.0441**	**0.2066**	**2,628.8176**

Northern Gateway Logistics Center - Riverside-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.5 Building Construction - 2025

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.3674	12.4697	16.0847	0.0270		0.5276	0.5276		0.4963	0.4963	0.0000	2,556.4744	2,556.4744	0.6010		2,571.4981
Total	**1.3674**	**12.4697**	**16.0847**	**0.0270**		**0.5276**	**0.5276**		**0.4963**	**0.4963**	**0.0000**	**2,556.4744**	**2,556.4744**	**0.6010**		**2,571.4981**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0658	2.2340	0.8839	0.0110	0.4163	0.0185	0.4348	0.1199	0.0177	0.1375		1,167.7284	1,167.7284	0.0129	0.1721	1,219.3334
Worker	0.4975	0.3100	4.2948	0.0138	1.8555	7.8500e-003	1.8633	0.4921	7.2300e-003	0.4993		1,398.4119	1,398.4119	0.0312	0.0345	1,409.4842
Total	**0.5633**	**2.5440**	**5.1788**	**0.0248**	**2.2718**	**0.0263**	**2.2981**	**0.6120**	**0.0249**	**0.6368**		**2,566.1403**	**2,566.1403**	**0.0441**	**0.2066**	**2,628.8176**

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Northern Gateway Logistics Center - Riverside-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.6 Paving - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9152	8.5816	14.5780	0.0228		0.4185	0.4185		0.3850	0.3850		2,206.7452	2,206.7452	0.7137		2,224.5878
Paving	0.6429					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**1.5581**	**8.5816**	**14.5780**	**0.0228**		**0.4185**	**0.4185**		**0.3850**	**0.3850**		**2,206.7452**	**2,206.7452**	**0.7137**		**2,224.5878**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0450	0.0280	0.3881	1.2500e-003	0.1677	7.1000e-004	0.1684	0.0445	6.5000e-004	0.0451		126.3625	126.3625	2.8200e-003	3.1200e-003	127.3630
Total	**0.0450**	**0.0280**	**0.3881**	**1.2500e-003**	**0.1677**	**7.1000e-004**	**0.1684**	**0.0445**	**6.5000e-004**	**0.0451**		**126.3625**	**126.3625**	**2.8200e-003**	**3.1200e-003**	**127.3630**

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Northern Gateway Logistics Center - Riverside-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.6 Paving - 2025

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9152	8.5816	14.5780	0.0228		0.4185	0.4185		0.3850	0.3850	0.0000	2,206.7452	2,206.7452	0.7137		2,224.5878
Paving	0.6429					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**1.5581**	**8.5816**	**14.5780**	**0.0228**		**0.4185**	**0.4185**		**0.3850**	**0.3850**	**0.0000**	**2,206.7452**	**2,206.7452**	**0.7137**		**2,224.5878**

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Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0450	0.0280	0.3881	1.2500e-003	0.1677	7.1000e-004	0.1684	0.0445	6.5000e-004	0.0451		126.3625	126.3625	2.8200e-003	3.1200e-003	127.3630
Total	**0.0450**	**0.0280**	**0.3881**	**1.2500e-003**	**0.1677**	**7.1000e-004**	**0.1684**	**0.0445**	**6.5000e-004**	**0.0451**		**126.3625**	**126.3625**	**2.8200e-003**	**3.1200e-003**	**127.3630**

Northern Gateway Logistics Center - Riverside-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.7 Architectural Coating - 2025

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	292.0079					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1709	1.1455	1.8091	2.9700e-003		0.0515	0.0515		0.0515	0.0515		281.4481	281.4481	0.0154		281.8319
Total	**292.1787**	**1.1455**	**1.8091**	**2.9700e-003**		**0.0515**	**0.0515**		**0.0515**	**0.0515**		**281.4481**	**281.4481**	**0.0154**		**281.8319**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0989	0.0616	0.8538	2.7500e-003	0.3689	1.5600e-003	0.3704	0.0978	1.4400e-003	0.0993		277.9975	277.9975	6.2000e-003	6.8700e-003	280.1987
Total	**0.0989**	**0.0616**	**0.8538**	**2.7500e-003**	**0.3689**	**1.5600e-003**	**0.3704**	**0.0978**	**1.4400e-003**	**0.0993**		**277.9975**	**277.9975**	**6.2000e-003**	**6.8700e-003**	**280.1987**

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Northern Gateway Logistics Center - Riverside-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

3.7 Architectural Coating - 2025

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	292.0079					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1709	1.1455	1.8091	2.9700e-003		0.0515	0.0515		0.0515	0.0515	0.0000	281.4481	281.4481	0.0154		281.8319
Total	**292.1787**	**1.1455**	**1.8091**	**2.9700e-003**		**0.0515**	**0.0515**		**0.0515**	**0.0515**	**0.0000**	**281.4481**	**281.4481**	**0.0154**		**281.8319**

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Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0989	0.0616	0.8538	2.7500e-003	0.3689	1.5600e-003	0.3704	0.0978	1.4400e-003	0.0993		277.9975	277.9975	6.2000e-003	6.8700e-003	280.1987
Total	**0.0989**	**0.0616**	**0.8538**	**2.7500e-003**	**0.3689**	**1.5600e-003**	**0.3704**	**0.0978**	**1.4400e-003**	**0.0993**		**277.9975**	**277.9975**	**6.2000e-003**	**6.8700e-003**	**280.1987**

Northern Gateway Logistics Center - Riverside-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.5257	0.8967	5.7120	0.0146	1.6688	0.0118	1.6806	0.4452	0.0111	0.4563		1,490.3221	1,490.3221	0.0727	0.0720	1,513.5862
Unmitigated	0.5257	0.8967	5.7120	0.0146	1.6688	0.0118	1.6806	0.4452	0.0111	0.4563		1,490.3221	1,490.3221	0.0727	0.0720	1,513.5862

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4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
General Office Building	0.00	0.00	0.00		
Parking Lot	0.00	0.00	0.00		
Unrefrigerated Warehouse-No Rail	184.32	184.32	184.32	789,943	789,943
Total	184.32	184.32	184.32	789,943	789,943

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
General Office Building	16.60	8.40	6.90	33.00	48.00	19.00	77	19	4
Parking Lot	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0
Unrefrigerated Warehouse-No	16.60	8.40	6.90	59.00	0.00	41.00	92	5	3

Northern Gateway Logistics Center - Riverside-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
General Office Building	0.540541	0.056458	0.173793	0.136090	0.025268	0.007074	0.011525	0.018705	0.000610	0.000304	0.023606	0.001094	0.004932
Parking Lot	0.540541	0.056458	0.173793	0.136090	0.025268	0.007074	0.011525	0.018705	0.000610	0.000304	0.023606	0.001094	0.004932
Unrefrigerated Warehouse-No Rail	0.540541	0.056458	0.173793	0.136090	0.025268	0.007074	0.011525	0.018705	0.000610	0.000304	0.023606	0.001094	0.004932

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

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	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.0242	0.2204	0.1851	1.3200e-003		0.0168	0.0168		0.0168	0.0168		264.4211	264.4211	5.0700e-003	4.8500e-003	265.9924
NaturalGas Unmitigated	0.0242	0.2204	0.1851	1.3200e-003		0.0168	0.0168		0.0168	0.0168		264.4211	264.4211	5.0700e-003	4.8500e-003	265.9924

Northern Gateway Logistics Center - Riverside-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
General Office Building	131.562	1.4200e-003	0.0129	0.0108	8.0000e-005		9.8000e-004	9.8000e-004		9.8000e-004	9.8000e-004		15.4778	15.4778	3.0000e-004	2.8000e-004	15.5698
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	2116.02	0.0228	0.2075	0.1743	1.2400e-003		0.0158	0.0158		0.0158	0.0158		248.9433	248.9433	4.7700e-003	4.5600e-003	250.4226
Total		**0.0242**	**0.2204**	**0.1851**	**1.3200e-003**		**0.0168**	**0.0168**		**0.0168**	**0.0168**		**264.4211**	**264.4211**	**5.0700e-003**	**4.8400e-003**	**265.9924**

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Northern Gateway Logistics Center - Riverside-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
General Office Building	0.131562	1.4200e-003	0.0129	0.0108	8.0000e-005		9.8000e-004	9.8000e-004		9.8000e-004	9.8000e-004		15.4778	15.4778	3.0000e-004	2.8000e-004	15.5698
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Unrefrigerated Warehouse-No Rail	2.11602	0.0228	0.2075	0.1743	1.2400e-003		0.0158	0.0158		0.0158	0.0158		248.9433	248.9433	4.7700e-003	4.5600e-003	250.4226
Total		**0.0242**	**0.2204**	**0.1851**	**1.3200e-003**		**0.0168**	**0.0168**		**0.0168**	**0.0168**		**264.4211**	**264.4211**	**5.0700e-003**	**4.8400e-003**	**265.9924**

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6.0 Area Detail

6.1 Mitigation Measures Area

Northern Gateway Logistics Center - Riverside-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	8.9039	6.9000e-004	0.0766	1.0000e-005		2.7000e-004	2.7000e-004		2.7000e-004	2.7000e-004		0.1646	0.1646	4.3000e-004		0.1753
Unmitigated	8.9039	6.9000e-004	0.0766	1.0000e-005		2.7000e-004	2.7000e-004		2.7000e-004	2.7000e-004		0.1646	0.1646	4.3000e-004		0.1753

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	1.0115					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	7.8854					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	7.0500e-003	6.9000e-004	0.0766	1.0000e-005		2.7000e-004	2.7000e-004		2.7000e-004	2.7000e-004		0.1646	0.1646	4.3000e-004		0.1753
Total	**8.9039**	**6.9000e-004**	**0.0766**	**1.0000e-005**		**2.7000e-004**	**2.7000e-004**		**2.7000e-004**	**2.7000e-004**		**0.1646**	**0.1646**	**4.3000e-004**		**0.1753**

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Northern Gateway Logistics Center - Riverside-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	1.0115					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	7.8854					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	7.0500e-003	6.9000e-004	0.0766	1.0000e-005		2.7000e-004	2.7000e-004		2.7000e-004	2.7000e-004		0.1646	0.1646	4.3000e-004		0.1753
Total	**8.9039**	**6.9000e-004**	**0.0766**	**1.0000e-005**		**2.7000e-004**	**2.7000e-004**		**2.7000e-004**	**2.7000e-004**		**0.1646**	**0.1646**	**4.3000e-004**		**0.1753**

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7.0 Water Detail

7.1 Mitigation Measures Water

Northern Gateway Logistics Center - Riverside-South Coast County, Winter

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

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Attachment C

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

2656 29th Street, Suite 201
Santa Monica, CA 90405

Matt Hagemann, P.G, C.Hg.
(949) 887-9013
mhagemann@swape.com

Matthew F. Hagemann, P.G., C.Hg., QSD, QSP

Geologic and Hydrogeologic Characterization
Investigation and Remediation Strategies
Litigation Support and Testifying Expert
Industrial Stormwater Compliance
CEQA Review

Education:

M.S. Degree, Geology, California State University Los Angeles, Los Angeles, CA, 1984.
B.A. Degree, Geology, Humboldt State University, Arcata, CA, 1982.

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Professional Certifications:

California Professional Geologist
California Certified Hydrogeologist
Qualified SWPPP Developer and Practitioner

Professional Experience:

Matt has 30 years of experience in environmental policy, contaminant assessment and remediation, stormwater compliance, and CEQA review. He spent nine years with the U.S. EPA in the RCRA and Superfund programs and served as EPA's Senior Science Policy Advisor in the Western Regional Office where he identified emerging threats to groundwater from perchlorate and MTBE. While with EPA, Matt also served as a Senior Hydrogeologist in the oversight of the assessment of seven major military facilities undergoing base closure. He led numerous enforcement actions under provisions of the Resource Conservation and Recovery Act (RCRA) and directed efforts to improve hydrogeologic characterization and water quality monitoring. For the past 15 years, as a founding partner with SWAPE, Matt has developed extensive client relationships and has managed complex projects that include consultation as an expert witness and a regulatory specialist, and a manager of projects ranging from industrial stormwater compliance to CEQA review of impacts from hazardous waste, air quality and greenhouse gas emissions.

Positions Matt has held include:

- Founding Partner, Soil/Water/Air Protection Enterprise (SWAPE) (2003 – present);
- Geology Instructor, Golden West College, 2010 – 2104, 2017;
- Senior Environmental Analyst, Komex H2O Science, Inc. (2000 – 2003);

- Executive Director, Orange Coast Watch (2001 – 2004);
- Senior Science Policy Advisor and Hydrogeologist, U.S. Environmental Protection Agency (1989–1998);
- Hydrogeologist, National Park Service, Water Resources Division (1998 – 2000);
- Adjunct Faculty Member, San Francisco State University, Department of Geosciences (1993 – 1998);
- Instructor, College of Marin, Department of Science (1990 – 1995);
- Geologist, U.S. Forest Service (1986 – 1998); and
- Geologist, Dames & Moore (1984 – 1986).

Senior Regulatory and Litigation Support Analyst:

With SWAPE, Matt's responsibilities have included:

- Lead analyst and testifying expert in the review of over 300 environmental impact reports and negative declarations since 2003 under CEQA that identify significant issues with regard to hazardous waste, water resources, water quality, air quality, greenhouse gas emissions, and geologic hazards. Make recommendations for additional mitigation measures to lead agencies at the local and county level to include additional characterization of health risks and implementation of protective measures to reduce worker exposure to hazards from toxins and Valley Fever.
- Stormwater analysis, sampling and best management practice evaluation at more than 100 industrial facilities.
- Expert witness on numerous cases including, for example, perfluorooctanoic acid (PFOA) contamination of groundwater, MTBE litigation, air toxins at hazards at a school, CERCLA compliance in assessment and remediation, and industrial stormwater contamination.
- Technical assistance and litigation support for vapor intrusion concerns.
- Lead analyst and testifying expert in the review of environmental issues in license applications for large solar power plants before the California Energy Commission.
- Manager of a project to evaluate numerous formerly used military sites in the western U.S.
- Manager of a comprehensive evaluation of potential sources of perchlorate contamination in Southern California drinking water wells.
- Manager and designated expert for litigation support under provisions of Proposition 65 in the review of releases of gasoline to sources drinking water at major refineries and hundreds of gas stations throughout California.

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With Komex H2O Science Inc., Matt's duties included the following:

- Senior author of a report on the extent of perchlorate contamination that was used in testimony by the former U.S. EPA Administrator and General Counsel.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of MTBE use, research, and regulation.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of perchlorate use, research, and regulation.
- Senior researcher in a study that estimates nationwide costs for MTBE remediation and drinking water treatment, results of which were published in newspapers nationwide and in testimony against provisions of an energy bill that would limit liability for oil companies.
- Research to support litigation to restore drinking water supplies that have been contaminated by MTBE in California and New York.

- Expert witness testimony in a case of oil production-related contamination in Mississippi.
- Lead author for a multi-volume remedial investigation report for an operating school in Los Angeles that met strict regulatory requirements and rigorous deadlines.
- Development of strategic approaches for cleanup of contaminated sites in consultation with clients and regulators.

Executive Director:

As Executive Director with Orange Coast Watch, Matt led efforts to restore water quality at Orange County beaches from multiple sources of contamination including urban runoff and the discharge of wastewater. In reporting to a Board of Directors that included representatives from leading Orange County universities and businesses, Matt prepared issue papers in the areas of treatment and disinfection of wastewater and control of the discharge of grease to sewer systems. Matt actively participated in the development of countywide water quality permits for the control of urban runoff and permits for the discharge of wastewater. Matt worked with other nonprofits to protect and restore water quality, including Surfrider, Natural Resources Defense Council and Orange County CoastKeeper as well as with business institutions including the Orange County Business Council.

Hydrogeology:

As a Senior Hydrogeologist with the U.S. Environmental Protection Agency, Matt led investigations to characterize and cleanup closing military bases, including Mare Island Naval Shipyard, Hunters Point Naval Shipyard, Treasure Island Naval Station, Alameda Naval Station, Moffett Field, Mather Army Airfield, and Sacramento Army Depot. Specific activities were as follows:

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- Led efforts to model groundwater flow and contaminant transport, ensured adequacy of monitoring networks, and assessed cleanup alternatives for contaminated sediment, soil, and groundwater.
- Initiated a regional program for evaluation of groundwater sampling practices and laboratory analysis at military bases.
- Identified emerging issues, wrote technical guidance, and assisted in policy and regulation development through work on four national U.S. EPA workgroups, including the Superfund Groundwater Technical Forum and the Federal Facilities Forum.

At the request of the State of Hawaii, Matt developed a methodology to determine the vulnerability of groundwater to contamination on the islands of Maui and Oahu. He used analytical models and a GIS to show zones of vulnerability, and the results were adopted and published by the State of Hawaii and County of Maui.

As a hydrogeologist with the EPA Groundwater Protection Section, Matt worked with provisions of the Safe Drinking Water Act and NEPA to prevent drinking water contamination. Specific activities included the following:

- Received an EPA Bronze Medal for his contribution to the development of national guidance for the protection of drinking water.
- Managed the Sole Source Aquifer Program and protected the drinking water of two communities through designation under the Safe Drinking Water Act. He prepared geologic reports, conducted

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public hearings, and responded to public comments from residents who were very concerned about the impact of designation.

- Reviewed a number of Environmental Impact Statements for planned major developments, including large hazardous and solid waste disposal facilities, mine reclamation, and water transfer.

Matt served as a hydrogeologist with the RCRA Hazardous Waste program. Duties were as follows:

- Supervised the hydrogeologic investigation of hazardous waste sites to determine compliance with Subtitle C requirements.
- Reviewed and wrote "part B" permits for the disposal of hazardous waste.
- Conducted RCRA Corrective Action investigations of waste sites and led inspections that formed the basis for significant enforcement actions that were developed in close coordination with U.S. EPA legal counsel.
- Wrote contract specifications and supervised contractor's investigations of waste sites.

With the National Park Service, Matt directed service-wide investigations of contaminant sources to prevent degradation of water quality, including the following tasks:

- Applied pertinent laws and regulations including CERCLA, RCRA, NEPA, NRDA, and the Clean Water Act to control military, mining, and landfill contaminants.
- Conducted watershed-scale investigations of contaminants at parks, including Yellowstone and Olympic National Park.
- Identified high-levels of perchlorate in soil adjacent to a national park in New Mexico and advised park superintendent on appropriate response actions under CERCLA.
- Served as a Park Service representative on the Interagency Perchlorate Steering Committee, a national workgroup.
- Developed a program to conduct environmental compliance audits of all National Parks while serving on a national workgroup.
- Co-authored two papers on the potential for water contamination from the operation of personal watercraft and snowmobiles, these papers serving as the basis for the development of nation-wide policy on the use of these vehicles in National Parks.
- Contributed to the Federal Multi-Agency Source Water Agreement under the Clean Water Action Plan.

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Policy:

Served senior management as the Senior Science Policy Advisor with the U.S. Environmental Protection Agency, Region 9.

Activities included the following:

- Advised the Regional Administrator and senior management on emerging issues such as the potential for the gasoline additive MTBE and ammonium perchlorate to contaminate drinking water supplies.
- Shaped EPA's national response to these threats by serving on workgroups and by contributing to guidance, including the Office of Research and Development publication, Oxygenates in Water: Critical Information and Research Needs.
- Improved the technical training of EPA's scientific and engineering staff.
- Earned an EPA Bronze Medal for representing the region's 300 scientists and engineers in negotiations with the Administrator and senior management to better integrate scientific

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principles into the policy-making process.
- Established national protocol for the peer review of scientific documents.

Geology:

With the U.S. Forest Service, Matt led investigations to determine hillslope stability of areas proposed for timber harvest in the central Oregon Coast Range. Specific activities were as follows:

- Mapped geology in the field, and used aerial photographic interpretation and mathematical models to determine slope stability.
- Coordinated his research with community members who were concerned with natural resource protection.
- Characterized the geology of an aquifer that serves as the sole source of drinking water for the city of Medford, Oregon.

As a consultant with Dames and Moore, Matt led geologic investigations of two contaminated sites (later listed on the Superfund NPL) in the Portland, Oregon, area and a large hazardous waste site in eastern Oregon. Duties included the following:

- Supervised year-long effort for soil and groundwater sampling.
- Conducted aquifer tests.
- Investigated active faults beneath sites proposed for hazardous waste disposal.

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Teaching:

From 1990 to 1998, Matt taught at least one course per semester at the community college and university levels:

- At San Francisco State University, held an adjunct faculty position and taught courses in environmental geology, oceanography (lab and lecture), hydrogeology, and groundwater contamination.
- Served as a committee member for graduate and undergraduate students.
- Taught courses in environmental geology and oceanography at the College of Marin.

Matt is currently a part time geology instructor at Golden West College in Huntington Beach, California where he taught from 2010 to 2014 and in 2017.

Invited Testimony, Reports, Papers and Presentations:

Hagemann, M.F., 2008. Disclosure of Hazardous Waste Issues under CEQA. Presentation to the Public Environmental Law Conference, Eugene, Oregon.

Hagemann, M.F., 2008. Disclosure of Hazardous Waste Issues under CEQA. Invited presentation to U.S. EPA Region 9, San Francisco, California.

Hagemann, M.F., 2005. Use of Electronic Databases in Environmental Regulation, Policy Making and Public Participation. Brownfields 2005, Denver, Coloradao.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Nevada and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Las Vegas, NV (served on conference organizing committee).

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Hagemann, M.F., 2004. Invited testimony to a California Senate committee hearing on air toxins at schools in Southern California, Los Angeles.

Brown, A., Farrow, J., Gray, A. and **Hagemann, M.**, 2004. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to the Ground Water and Environmental Law Conference, National Groundwater Association.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Arizona and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Phoenix, AZ (served on conference organizing committee).

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in the Southwestern U.S. Invited presentation to a special committee meeting of the National Academy of Sciences, Irvine, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a tribal EPA meeting, Pechanga, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a meeting of tribal repesentatives, Parker, AZ.

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Hagemann, M.F., 2003. Impact of Perchlorate on the Colorado River and Associated Drinking Water Supplies. Invited presentation to the Inter-Tribal Meeting, Torres Martinez Tribe.

Hagemann, M.F., 2003. The Emergence of Perchlorate as a Widespread Drinking Water Contaminant. Invited presentation to the U.S. EPA Region 9.

Hagemann, M.F., 2003. A Deductive Approach to the Assessment of Perchlorate Contamination. Invited presentation to the California Assembly Natural Resources Committee.

Hagemann, M.F., 2003. Perchlorate: A Cold War Legacy in Drinking Water. Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. From Tank to Tap: A Chronology of MTBE in Groundwater. Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. A Chronology of MTBE in Groundwater and an Estimate of Costs to Address Impacts to Groundwater. Presentation to the annual meeting of the Society of Environmental Journalists.

Hagemann, M.F., 2002. An Estimate of the Cost to Address MTBE Contamination in Groundwater (and Who Will Pay). Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to a meeting of the U.S. EPA and State Underground Storage Tank Program managers.

Hagemann, M.F., 2001. From Tank to Tap: A Chronology of MTBE in Groundwater. Unpublished report.

Hagemann, M.F., 2001. Estimated Cleanup Cost for MTBE in Groundwater Used as Drinking Water. Unpublished report.

Hagemann, M.F., 2001. Estimated Costs to Address MTBE Releases from Leaking Underground Storage Tanks. Unpublished report.

Hagemann, M.F., and VanMouwerik, M., 1999. Potential Water Quality Concerns Related to Snowmobile Usage. Water Resources Division, National Park Service, Technical Report.

VanMouwerik, M. and **Hagemann, M.F.** 1999, Water Quality Concerns Related to Personal Watercraft Usage. Water Resources Division, National Park Service, Technical Report.

Hagemann, M.F., 1999, Is Dilution the Solution to Pollution in National Parks? The George Wright Society Biannual Meeting, Asheville, North Carolina.

Hagemann, M.F., 1997, The Potential for MTBE to Contaminate Groundwater. U.S. EPA Superfund Groundwater Technical Forum Annual Meeting, Las Vegas, Nevada.

Hagemann, M.F., and Gill, M., 1996, Impediments to Intrinsic Remediation, Moffett Field Naval Air Station, Conference on Intrinsic Remediation of Chlorinated Hydrocarbons, Salt Lake City.

Hagemann, M.F., Fukunaga, G.L., 1996, The Vulnerability of Groundwater to Anthropogenic Contaminants on the Island of Maui, Hawaii. Hawaii Water Works Association Annual Meeting, Maui, October 1996.

Hagemann, M. F., Fukanaga, G. L., 1996, Ranking Groundwater Vulnerability in Central Oahu, Hawaii. Proceedings, Geographic Information Systems in Environmental Resources Management, Air and Waste Management Association Publication VIP-61.

Hagemann, M.F., 1994. Groundwater Characterization and Cleanup at Closing Military Bases in California. Proceedings, California Groundwater Resources Association Meeting.

Hagemann, M.F. and Sabol, M.A., 1993. Role of the U.S. EPA in the High Plains States Groundwater Recharge Demonstration Program. Proceedings, Sixth Biennial Symposium on the Artificial Recharge of Groundwater.

Hagemann, M.F., 1993. U.S. EPA Policy on the Technical Impracticability of the Cleanup of DNAPL-contaminated Groundwater. California Groundwater Resources Association Meeting.

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Hagemann, M.F., 1992. Dense Nonaqueous Phase Liquid Contamination of Groundwater: An Ounce of Prevention... Proceedings, Association of Engineering Geologists Annual Meeting, v. 35.

Other Experience:

Selected as subject matter expert for the California Professional Geologist licensing examinations, 2009-2011.

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Attachment D

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

SOIL WATER AIR PROTECTION ENTERPRISE
2656 29th Street, Suite 201
Santa Monica, California 90405
Attn: Paul Rosenfeld, Ph.D.
Mobil: (310) 795-2335
Office: (310) 452-5555
Fax: (310) 452-5550
Email: prosenfeld@swape.com

Paul Rosenfeld, Ph.D.

Chemical Fate and Transport & Air Dispersion Modeling

Principal Environmental Chemist

Risk Assessment & Remediation Specialist

Education

Ph.D. Soil Chemistry, University of Washington, 1999. Dissertation on volatile organic compound filtration.

M.S. Environmental Science, U.C. Berkeley, 1995. Thesis on organic waste economics.

B.A. Environmental Studies, U.C. Santa Barbara, 1991. Focus on wastewater treatment.

Professional Experience

Dr. Rosenfeld has over 25 years of experience conducting environmental investigations and risk assessments for evaluating impacts to human health, property, and ecological receptors. His expertise focuses on the fate and transport of environmental contaminants, human health risk, exposure assessment, and ecological restoration. Dr. Rosenfeld has evaluated and modeled emissions from oil spills, landfills, boilers and incinerators, process stacks, storage tanks, confined animal feeding operations, industrial, military and agricultural sources, unconventional oil drilling operations, and locomotive and construction engines. His project experience ranges from monitoring and modeling of pollution sources to evaluating impacts of pollution on workers at industrial facilities and residents in surrounding communities. Dr. Rosenfeld has also successfully modeled exposure to contaminants distributed by water systems and via vapor intrusion.

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Dr. Rosenfeld has investigated and designed remediation programs and risk assessments for contaminated sites containing lead, heavy metals, mold, bacteria, particulate matter, petroleum hydrocarbons, chlorinated solvents, pesticides, radioactive waste, dioxins and furans, semi- and volatile organic compounds, PCBs, PAHs, creosote, perchlorate, asbestos, per- and poly-fluoroalkyl substances (PFOA/PFOS), unusual polymers, fuel oxygenates (MTBE), among other pollutants. Dr. Rosenfeld also has experience evaluating greenhouse gas emissions from various projects and is an expert on the assessment of odors from industrial and agricultural sites, as well as the evaluation of odor nuisance impacts and technologies for abatement of odorous emissions. As a principal scientist at SWAPE, Dr. Rosenfeld directs air dispersion modeling and exposure assessments. He has served as an expert witness and testified about pollution sources causing nuisance and/or personal injury at sites and has testified as an expert witness on numerous cases involving exposure to soil, water and air contaminants from industrial, railroad, agricultural, and military sources.

Professional History:

Soil Water Air Protection Enterprise (SWAPE); 2003 to present; Principal and Founding Partner
UCLA School of Public Health; 2007 to 2011; Lecturer (Assistant Researcher)
UCLA School of Public Health; 2003 to 2006; Adjunct Professor
UCLA Environmental Science and Engineering Program; 2002-2004; Doctoral Intern Coordinator
UCLA Institute of the Environment, 2001-2002; Research Associate
Komex H_2O Science, 2001 to 2003; Senior Remediation Scientist
National Groundwater Association, 2002-2004; Lecturer
San Diego State University, 1999-2001; Adjunct Professor
Anteon Corp., San Diego, 2000-2001; Remediation Project Manager
Ogden (now Amec), San Diego, 2000-2000; Remediation Project Manager
Bechtel, San Diego, California, 1999 – 2000; Risk Assessor
King County, Seattle, 1996 – 1999; Scientist
James River Corp., Washington, 1995-96; Scientist
Big Creek Lumber, Davenport, California, 1995; Scientist
Plumas Corp., California and USFS, Tahoe 1993-1995; Scientist
Peace Corps and World Wildlife Fund, St. Kitts, West Indies, 1991-1993; Scientist

Publications:

Rosenfeld P. E., Spaeth K., Hallman R., Bressler R., Smith, G., (2022) Cancer Risk and Diesel Exhaust Exposure Among Railroad Workers. *Water Air Soil Pollution*. 233, 171.

Remy, L.L., Clay T., Byers, V., **Rosenfeld P. E.** (2019) Hospital, Health, and Community Burden After Oil Refinery Fires, Richmond, California 2007 and 2012. *Environmental Health*. 18:48

Simons, R.A., Seo, Y. **Rosenfeld, P.**, (2015) Modeling the Effect of Refinery Emission On Residential Property Value. Journal of Real Estate Research. 27(3):321-342

Chen, J. A, Zapata A. R., Sutherland A. J., Molmen, D.R., Chow, B. S., Wu, L. E., **Rosenfeld, P. E.**, Hesse, R. C., (2012) Sulfur Dioxide and Volatile Organic Compound Exposure To A Community In Texas City Texas Evaluated Using Aermod and Empirical Data. *American Journal of Environmental Science*, 8(6), 622-632.

Rosenfeld, P.E. & Feng, L. (2011). *The Risks of Hazardous Waste*. Amsterdam: Elsevier Publishing.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2011). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Agrochemical Industry*, Amsterdam: Elsevier Publishing.

Gonzalez, J., Feng, L., Sutherland, A., Waller, C., Sok, H., Hesse, R., **Rosenfeld, P.** (2010). PCBs and Dioxins/Furans in Attic Dust Collected Near Former PCB Production and Secondary Copper Facilities in Sauget, IL. *Procedia Environmental Sciences*. 113–125.

Feng, L., Wu, C., Tam, L., Sutherland, A.J., Clark, J.J., **Rosenfeld, P.E.** (2010). Dioxin and Furan Blood Lipid and Attic Dust Concentrations in Populations Living Near Four Wood Treatment Facilities in the United States. *Journal of Environmental Health*. 73(6), 34-46.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2010). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Wood and Paper Industries*. Amsterdam: Elsevier Publishing.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2009). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Petroleum Industry*. Amsterdam: Elsevier Publishing.

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Wu, C., Tam, L., Clark, J., **Rosenfeld, P.** (2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. *WIT Transactions on Ecology and the Environment, Air Pollution,* 123 (17), 319-327.

Tam L. K.., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008). A Statistical Analysis Of Attic Dust And Blood Lipid Concentrations Of Tetrachloro-p-Dibenzodioxin (TCDD) Toxicity Equivalency Quotients (TEQ) In Two Populations Near Wood Treatment Facilities. *Organohalogen Compounds*, 70, 002252-002255.

Tam L. K.., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008). Methods For Collect Samples For Assessing Dioxins And Other Environmental Contaminants In Attic Dust: A Review. *Organohalogen Compounds*, 70, 000527-000530.

Hensley, A.R. A. Scott, J. J. J. Clark, **Rosenfeld, P.E.** (2007). Attic Dust and Human Blood Samples Collected near a Former Wood Treatment Facility. *Environmental Research*. 105, 194-197.

Rosenfeld, P.E., J. J. J. Clark, A. R. Hensley, M. Suffet. (2007). The Use of an Odor Wheel Classification for Evaluation of Human Health Risk Criteria for Compost Facilities. *Water Science & Technology* 55(5), 345-357.

Rosenfeld, P. E., M. Suffet. (2007). The Anatomy Of Odour Wheels For Odours Of Drinking Water, Wastewater, Compost And The Urban Environment. *Water Science & Technology* 55(5), 335-344.

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Rosenfeld, P.E., and Suffet I.H. (2004). Control of Compost Odor Using High Carbon Wood Ash. *Water Science and Technology*. 49(9),171-178.

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Rosenfeld, P.E., and Suffet, I.H. (2004). Understanding Odorants Associated With Compost, Biomass Facilities, and the Land Application of Biosolids. *Water Science and Technology*. 49(9), 193-199.

Rosenfeld, P.E., and Suffet I.H. (2004). Control of Compost Odor Using High Carbon Wood Ash, *Water Science and Technology*, 49(9), 171-178.

Rosenfeld, P. E., Grey, M. A., Sellew, P. (2004). Measurement of Biosolids Odor and Odorant Emissions from Windrows, Static Pile and Biofilter. *Water Environment Research*. 76(4), 310-315.

Rosenfeld, P.E., Grey, M and Suffet, M. (2002). Compost Demonstration Project, Sacramento California Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Integrated Waste Management Board Public Affairs Office*, Publications Clearinghouse (MS–6), Sacramento, CA Publication #442-02-008.

Rosenfeld, P.E., and C.L. Henry. (2001). Characterization of odor emissions from three different biosolids. *Water Soil and Air Pollution*. 127(1-4), 173-191.

Rosenfeld, P.E., and Henry C. L., (2000). Wood ash control of odor emissions from biosolids application. *Journal of Environmental Quality*. 29, 1662-1668.

Rosenfeld, P.E., C.L. Henry and D. Bennett. (2001). Wastewater dewatering polymer affect on biosolids odor emissions and microbial activity. *Water Environment Research*. 73(4), 363-367.

Rosenfeld, P.E., and C.L. Henry. (2001). Activated Carbon and Wood Ash Sorption of Wastewater, Compost, and Biosolids Odorants. *Water Environment Research*, 73, 388-393.

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Rosenfeld, P.E., and Henry C. L., (2001). High carbon wood ash effect on biosolids microbial activity and odor. *Water Environment Research*. 131(1-4), 247-262.

Chollack, T. and **P. Rosenfeld.** (1998). Compost Amendment Handbook For Landscaping. Prepared for and distributed by the City of Redmond, Washington State.

Rosenfeld, P. E. (1992). The Mount Liamuiga Crater Trail. *Heritage Magazine of St. Kitts*, 3(2).

Rosenfeld, P. E. (1993). High School Biogas Project to Prevent Deforestation On St. Kitts. *Biomass Users Network*, 7(1).

Rosenfeld, P. E. (1998). Characterization, Quantification, and Control of Odor Emissions From Biosolids Application To Forest Soil. Doctoral Thesis. University of Washington College of Forest Resources.

Rosenfeld, P. E. (1994). Potential Utilization of Small Diameter Trees on Sierra County Public Land. Masters thesis reprinted by the Sierra County Economic Council. Sierra County, California.

Rosenfeld, P. E. (1991). How to Build a Small Rural Anaerobic Digester & Uses Of Biogas In The First And Third World. Bachelors Thesis. University of California.

Presentations:

Rosenfeld, P.E., "The science for Perfluorinated Chemicals (PFAS): What makes remediation so hard?" Law Seminars International, (May 9-10, 2018) 800 Fifth Avenue, Suite 101 Seattle, WA.

Rosenfeld, P.E., Sutherland, A; Hesse, R.; Zapata, A. (October 3-6, 2013). Air dispersion modeling of volatile organic emissions from multiple natural gas wells in Decatur, TX. *44th Western Regional Meeting, American Chemical Society*. Lecture conducted from Santa Clara, CA.

Sok, H.L.; Waller, C.C.; Feng, L.; Gonzalez, J.; Sutherland, A.J.; Wisdom-Stack, T.; Sahai, R.K.; Hesse, R.C.; **Rosenfeld**, P.E. (June 20-23, 2010). Atrazine: A Persistent Pesticide in Urban Drinking Water. *Urban Environmental Pollution*. Lecture conducted from Boston, MA.

Feng, L.; Gonzalez, J.; Sok, H.L.; Sutherland, A.J.; Waller, C.C.; Wisdom-Stack, T.; Sahai, R.K.; La, M.; Hesse, R.C.; **Rosenfeld**, P.E. (June 20-23, 2010). Bringing Environmental Justice to East St. Louis, Illinois. *Urban Environmental Pollution.* Lecture conducted from Boston, MA.

Rosenfeld, P.E. (April 19-23, 2009). Perfluoroctanoic Acid (PFOA) and Perfluoroactane Sulfonate (PFOS) Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*, Lecture conducted from Tuscon, AZ.

Rosenfeld, P.E. (April 19-23, 2009). Cost to Filter Atrazine Contamination from Drinking Water in the United States" Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*. Lecture conducted from Tuscon, AZ.

Wu, C., Tam, L., Clark, J., **Rosenfeld**, P. (20-22 July, 2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. Brebbia, C.A. and Popov, V., eds., *Air Pollution XVII: Proceedings of the Seventeenth International Conference on Modeling, Monitoring and Management of Air Pollution*. Lecture conducted from Tallinn, Estonia.

Rosenfeld, P. E. (October 15-18, 2007). Moss Point Community Exposure To Contaminants From A Releasing Facility. *The 23rd Annual International Conferences on Soils Sediment and Water.* Platform lecture conducted from University of Massachusetts, Amherst MA.

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Rosenfeld, P. E. (October 15-18, 2007). The Repeated Trespass of Tritium-Contaminated Water Into A Surrounding Community Form Repeated Waste Spills From A Nuclear Power Plant. *The 23rd Annual International Conferences on Soils Sediment and Water*. Platform lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld, P. E. (October 15-18, 2007). Somerville Community Exposure To Contaminants From Wood Treatment Facility Emissions. The *23rd Annual International Conferences on Soils Sediment and Water*. Lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld P. E. (March 2007). Production, Chemical Properties, Toxicology, & Treatment Case Studies of 1,2,3-Trichloropropane (TCP). *The Association for Environmental Health and Sciences (AEHS) Annual Meeting*. Lecture conducted from San Diego, CA.

Rosenfeld P. E. (March 2007). Blood and Attic Sampling for Dioxin/Furan, PAH, and Metal Exposure in Florala, Alabama. *The AEHS Annual Meeting*. Lecture conducted from San Diego, CA.

Hensley A.R., Scott, A., **Rosenfeld P.E.**, Clark, J.J.J. (August 21 – 25, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *The 26th International Symposium on Halogenated Persistent Organic Pollutants – DIOXIN2006*. Lecture conducted from Radisson SAS Scandinavia Hotel in Oslo Norway.

Hensley A.R., Scott, A., **Rosenfeld P.E.**, Clark, J.J.J. (November 4-8, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *APHA 134 Annual Meeting & Exposition*. Lecture conducted from Boston Massachusetts.

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Paul Rosenfeld Ph.D. (October 24-25, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. Mealey's C8/PFOA. *Science, Risk & Litigation Conference*. Lecture conducted from The Rittenhouse Hotel, Philadelphia, PA.

Paul Rosenfeld Ph.D. (September 19, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, *Toxicology and Remediation PEMA Emerging Contaminant Conference*. Lecture conducted from Hilton Hotel, Irvine California.

Paul Rosenfeld Ph.D. (September 19, 2005). Fate, Transport, Toxicity, And Persistence of 1,2,3-TCP. *PEMA Emerging Contaminant Conference*. Lecture conducted from Hilton Hotel in Irvine, California.

Paul Rosenfeld Ph.D. (September 26-27, 2005). Fate, Transport and Persistence of PDBEs. *Mealey's Groundwater Conference*. Lecture conducted from Ritz Carlton Hotel, Marina Del Ray, California.

Paul Rosenfeld Ph.D. (June 7-8, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. *International Society of Environmental Forensics: Focus On Emerging Contaminants*. Lecture conducted from Sheraton Oceanfront Hotel, Virginia Beach, Virginia.

Paul Rosenfeld Ph.D. (July 21-22, 2005). Fate Transport, Persistence and Toxicology of PFOA and Related Perfluorochemicals. *2005 National Groundwater Association Ground Water And Environmental Law Conference*. Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

Paul Rosenfeld Ph.D. (July 21-22, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, Toxicology and Remediation. *2005 National Groundwater Association Ground Water and Environmental Law Conference*. Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

Paul Rosenfeld, Ph.D. and James Clark Ph.D. and Rob Hesse R.G. (May 5-6, 2004). Tert-butyl Alcohol Liability and Toxicology, A National Problem and Unquantified Liability. *National Groundwater Association. Environmental Law Conference*. Lecture conducted from Congress Plaza Hotel, Chicago Illinois.

Paul Rosenfeld, Ph.D. (March 2004). Perchlorate Toxicology. *Meeting of the American Groundwater Trust*. Lecture conducted from Phoenix Arizona.

Hagemann, M.F., **Paul Rosenfeld, Ph.D.** and Rob Hesse (2004). Perchlorate Contamination of the Colorado River. *Meeting of tribal representatives*. Lecture conducted from Parker, AZ.

Paul Rosenfeld, Ph.D. (April 7, 2004). A National Damage Assessment Model For PCE and Dry Cleaners. *Drycleaner Symposium. California Ground Water Association*. Lecture conducted from Radison Hotel, Sacramento, California.

Rosenfeld, P. E., Grey, M., (June 2003) Two stage biofilter for biosolids composting odor control. *Seventh International In Situ And On Site Bioremediation Symposium Battelle Conference* Orlando, FL.

Paul Rosenfeld, Ph.D. and James Clark Ph.D. (February 20-21, 2003) Understanding Historical Use, Chemical Properties, Toxicity and Regulatory Guidance of 1,4 Dioxane. *National Groundwater Association. Southwest Focus Conference. Water Supply and Emerging Contaminants*.. Lecture conducted from Hyatt Regency Phoenix Arizona.

Paul Rosenfeld, Ph.D. (February 6-7, 2003). Underground Storage Tank Litigation and Remediation. *California CUPA Forum*. Lecture conducted from Marriott Hotel, Anaheim California.

Paul Rosenfeld, Ph.D. (October 23, 2002) Underground Storage Tank Litigation and Remediation. *EPA Underground Storage Tank Roundtable*. Lecture conducted from Sacramento California.

Rosenfeld, P.E. and Suffet, M. (October 7- 10, 2002). Understanding Odor from Compost, *Wastewater and Industrial Processes. Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

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Rosenfeld, P.E. and Suffet, M. (October 7- 10, 2002). Using High Carbon Wood Ash to Control Compost Odor. *Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

Rosenfeld, P.E. and Grey, M. A. (September 22-24, 2002). Biocycle Composting For Coastal Sage Restoration. *Northwest Biosolids Management Association*. Lecture conducted from Vancouver Washington..

Rosenfeld, P.E. and Grey, M. A. (November 11-14, 2002). Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Soil Science Society Annual Conference*. Lecture conducted from Indianapolis, Maryland.

Rosenfeld. P.E. (September 16, 2000). Two stage biofilter for biosolids composting odor control. *Water Environment Federation*. Lecture conducted from Anaheim California.

Rosenfeld. P.E. (October 16, 2000). Wood ash and biofilter control of compost odor. *Biofest*. Lecture conducted from Ocean Shores, California.

Rosenfeld, P.E. (2000). Bioremediation Using Organic Soil Amendments. *California Resource Recovery Association*. Lecture conducted from Sacramento California.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. *Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings*. Lecture conducted from Bellevue Washington.

Rosenfeld, P.E., and C.L. Henry. (1999). An evaluation of ash incorporation with biosolids for odor reduction. *Soil Science Society of America*. Lecture conducted from Salt Lake City Utah.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Comparison of Microbial Activity and Odor Emissions from Three Different Biosolids Applied to Forest Soil. *Brown and Caldwell*. Lecture conducted from Seattle Washington.

Rosenfeld, P.E., C.L. Henry. (1998). Characterization, Quantification, and Control of Odor Emissions from Biosolids Application To Forest Soil. *Biofest*. Lecture conducted from Lake Chelan, Washington.

Rosenfeld, P.E, C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings. Lecture conducted from Bellevue Washington.

Rosenfeld, P.E., C.L. Henry, R. B. Harrison, and R. Dills. (1997). Comparison of Odor Emissions From Three Different Biosolids Applied to Forest Soil. *Soil Science Society of America*. Lecture conducted from Anaheim California.

Teaching Experience:

UCLA Department of Environmental Health (Summer 2003 through 20010) Taught Environmental Health Science 100 to students, including undergrad, medical doctors, public health professionals and nurses. Course focused on the health effects of environmental contaminants.

National Ground Water Association, Successful Remediation Technologies. Custom Course in Sante Fe, New Mexico. May 21, 2002. Focused on fate and transport of fuel contaminants associated with underground storage tanks.

National Ground Water Association; Successful Remediation Technologies Course in Chicago Illinois. April 1, 2002. Focused on fate and transport of contaminants associated with Superfund and RCRA sites.

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California Integrated Waste Management Board, April and May, 2001. Alternative Landfill Caps Seminar in San Diego, Ventura, and San Francisco. Focused on both prescriptive and innovative landfill cover design.

UCLA Department of Environmental Engineering, February 5, 2002. Seminar on Successful Remediation Technologies focusing on Groundwater Remediation.

University Of Washington, Soil Science Program, Teaching Assistant for several courses including: Soil Chemistry, Organic Soil Amendments, and Soil Stability.

U.C. Berkeley, Environmental Science Program Teaching Assistant for Environmental Science 10.

Academic Grants Awarded:

California Integrated Waste Management Board. $41,000 grant awarded to UCLA Institute of the Environment. Goal: To investigate effect of high carbon wood ash on volatile organic emissions from compost. 2001.

Synagro Technologies, Corona California: $10,000 grant awarded to San Diego State University.
Goal: investigate effect of biosolids for restoration and remediation of degraded coastal sage soils. 2000.

King County, Department of Research and Technology, Washington State. $100,000 grant awarded to University of Washington: Goal: To investigate odor emissions from biosolids application and the effect of polymers and ash on VOC emissions. 1998.

Northwest Biosolids Management Association, Washington State. $20,000 grant awarded to investigate effect of polymers and ash on VOC emissions from biosolids. 1997.

James River Corporation, Oregon: $10,000 grant was awarded to investigate the success of genetically engineered Poplar trees with resistance to round-up. 1996.

United State Forest Service, Tahoe National Forest: $15,000 grant was awarded to investigating fire ecology of the Tahoe National Forest. 1995.

Kellogg Foundation, Washington D.C. $500 grant was awarded to construct a large anaerobic digester on St. Kitts in West Indies. 1993

Deposition and/or Trial Testimony:

In the Superior Court of the State of California, County of San Bernardino
Billy Wildrick, Plaintiff vs. BNSF Railway Company
Case No. CIVDS1711810
Rosenfeld Deposition 10-17-2022

In the State Court of Bibb County, State of Georgia
Richard Hutcherson, Plaintiff vs Norfolk Southern Railway Company
Case No. 10-SCCV-092007
Rosenfeld Deposition 10-6-2022

In the Civil District Court of the Parish of Orleans, State of Louisiana
Millard Clark, Plaintiff vs. Dixie Carriers, Inc. et al.
Case No. 2020-03891
Rosenfeld Deposition 9-15-2022

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In The Circuit Court of Livingston County, State of Missouri, Circuit Civil Division
Shirley Ralls, Plaintiff vs. Canadian Pacific Railway and Soo Line Railroad
Case No. 18-LV-CC0020
Rosenfeld Deposition 9-7-2022

In The Circuit Court of the 13th Judicial Circuit Court, Hillsborough County, Florida Civil Division
Jonny C. Daniels, Plaintiff vs. CSX Transportation Inc.
Case No. 20-CA-5502
Rosenfeld Deposition 9-1-2022

In The Circuit Court of St. Louis County, State of Missouri
Kieth Luke et. al. Plaintiff vs. Monsanto Company et. al.
Case No. 19SL-CC03191
Rosenfeld Deposition 8-25-2022

In The Circuit Court of the 13th Judicial Circuit Court, Hillsborough County, Florida Civil Division
Jeffery S. Lamotte, Plaintiff vs. CSX Transportation Inc.
Case No. NO. 20-CA-0049
Rosenfeld Deposition 8-22-2022

In State of Minnesota District Court, County of St. Louis Sixth Judicial District
Greg Bean, Plaintiff vs. Soo Line Railroad Company
Case No. 69-DU-CV-21-760
Rosenfeld Deposition 8-17-2022

In United States District Court Western District of Washington at Tacoma, Washington
John D. Fitzgerald Plaintiff vs. BNSF
Case No. 3:21-cv-05288-RJB
Rosenfeld Deposition 8-11-2022

In Circuit Court of the Sixth Judicial Circuit, Macon Illinois
Rocky Bennyhoff Plaintiff vs. Norfolk Southern
Case No. 20-L-56
Rosenfeld Deposition 8-3-2022

In Court of Common Pleas, Hamilton County Ohio
Joe Briggins Plaintiff vs. CSX
Case No. A2004464
Rosenfeld Deposition 6-17-2022

In the Superior Court of the State of California, County of Kern
George LaFazia vs. BNSF Railway Company.
Case No. BCV-19-103087
Rosenfeld Deposition 5-17-2022

In the Circuit Court of Cook County Illinois
Bobby Earles vs. Penn Central et. al.
Case No. 2020-L-000550
Rosenfeld Deposition 4-16-2022

In United States District Court Easter District of Florida
Albert Hartman Plaintiff vs. Illinois Central
Case No. 2:20-cv-1633
Rosenfeld Deposition 4-4-2022

In the Circuit Court of the 4th Judicial Circuit, in and For Duval County, Florida
Barbara Steele vs. CSX Transportation
Case No.16-219-Ca-008796
Rosenfeld Deposition 3-15-2022

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In United States District Court Easter District of New York
Romano et al. vs. Northrup Grumman Corporation
Case No. 16-cv-5760
Rosenfeld Deposition 3-10-2022

In the Circuit Court of Cook County Illinois
Linda Benjamin vs. Illinois Central
Case No. No. 2019 L 007599
Rosenfeld Deposition 1-26-2022

In the Circuit Court of Cook County Illinois
Donald Smith vs. Illinois Central
Case No. No. 2019 L 003426
Rosenfeld Deposition 1-24-2022

In the Circuit Court of Cook County Illinois
Jan Holeman vs. BNSF
Case No. 2019 L 000675
Rosenfeld Deposition 1-18-2022

In the State Court of Bibb County State of Georgia
Dwayne B. Garrett vs. Norfolk Southern
Case No. 20-SCCV-091232
Rosenfeld Deposition 11-10-2021

In the Circuit Court of Cook County Illinois
Joseph Ruepke vs. BNSF
Case No. 2019 L 007730
Rosenfeld Deposition 11-5-2021

In the United States District Court For the District of Nebraska
Steven Gillett vs. BNSF
Case No. 4:20-cv-03120
Rosenfeld Deposition 10-28-2021

In the Montana Thirteenth District Court of Yellowstone County
James Eadus vs. Soo Line Railroad and BNSF
Case No. DV 19-1056
Rosenfeld Deposition 10-21-2021

In the Circuit Court Of The Twentieth Judicial Circuit, St Clair County, Illinois
Martha Custer et al.cvs. Cerro Flow Products, Inc.
Case No. 0i9-L-2295
Rosenfeld Deposition 5-14-2021
Trial October 8-4-2021

In the Circuit Court of Cook County Illinois
Joseph Rafferty vs. Consolidated Rail Corporation and National Railroad Passenger Corporation d/b/a AMTRAK,
Case No. 18-L-6845
Rosenfeld Deposition 6-28-2021

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In the United States District Court For the Northern District of Illinois
Theresa Romcoe vs. Northeast Illinois Regional Commuter Railroad Corporation d/b/a METRA Rail
Case No. 17-cv-8517
Rosenfeld Deposition 5-25-2021

In the Superior Court of the State of Arizona In and For the Cunty of Maricopa
Mary Tryon et al. vs. The City of Pheonix v. Cox Cactus Farm, L.L.C., Utah Shelter Systems, Inc.
Case No. CV20127-094749
Rosenfeld Deposition 5-7-2021

In the United States District Court for the Eastern District of Texas Beaumont Division
Robinson, Jeremy et al vs. CNA Insurance Company et al.
Case No. 1:17-cv-000508
Rosenfeld Deposition 3-25-2021

In the Superior Court of the State of California, County of San Bernardino
Gary Garner, Personal Representative for the Estate of Melvin Garner vs. BNSF Railway Company.
Case No. 1720288
Rosenfeld Deposition 2-23-2021

In the Superior Court of the State of California, County of Los Angeles, Spring Street Courthouse
Benny M Rodriguez vs. Union Pacific Railroad, A Corporation, et al.
Case No. 18STCV01162
Rosenfeld Deposition 12-23-2020

In the Circuit Court of Jackson County, Missouri
Karen Cornwell, Plaintiff, vs. Marathon Petroleum, LP, Defendant.
Case No. 1716-CV10006
Rosenfeld Deposition 8-30-2019

In the United States District Court For The District of New Jersey
Duarte et al, Plaintiffs, vs. United States Metals Refining Company et. al. Defendant.
Case No. 2:17-cv-01624-ES-SCM
Rosenfeld Deposition 6-7-2019

In the United States District Court of Southern District of Texas Galveston Division
M/T Carla Maersk vs. Conti 168., Schiffahrts-GMBH & Co. Bulker KG MS "Conti Perdido" Defendant.
Case No. 3:15-CV-00106 consolidated with 3:15-CV-00237
Rosenfeld Deposition 5-9-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
Carole-Taddeo-Bates et al., vs. Ifran Khan et al., Defendants
Case No. BC615636
Rosenfeld Deposition 1-26-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
The San Gabriel Valley Council of Governments et al. vs El Adobe Apts. Inc. et al., Defendants
Case No. BC646857
Rosenfeld Deposition 10-6-2018; Trial 3-7-19

In United States District Court For The District of Colorado
Bells et al. Plaintiffs vs. The 3M Company et al., Defendants
Case No. 1:16-cv-02531-RBJ
Rosenfeld Deposition 3-15-2018 and 4-3-2018

In The District Court Of Regan County, Texas, 112th Judicial District
Phillip Bales et al., Plaintiff vs. Dow Agrosciences, LLC, et al., Defendants
Cause No. 1923
Rosenfeld Deposition 11-17-2017

In The Superior Court of the State of California In And For The County Of Contra Costa
Simons et al., Plaintifs vs. Chevron Corporation, et al., Defendants
Cause No. C12-01481
Rosenfeld Deposition 11-20-2017

In The Circuit Court Of The Twentieth Judicial Circuit, St Clair County, Illinois
Martha Custer et al., Plaintiff vs. Cerro Flow Products, Inc., Defendants
Case No.: No. 0i9-L-2295
Rosenfeld Deposition 8-23-2017

In United States District Court For The Southern District of Mississippi
Guy Manuel vs. The BP Exploration et al., Defendants
Case No. 1:19-cv-00315-RHW
Rosenfeld Deposition 4-22-2020

In The Superior Court of the State of California, For The County of Los Angeles
Warrn Gilbert and Penny Gilber, Plaintiff vs. BMW of North America LLC
Case No. LC102019 (c/w BC582154)
Rosenfeld Deposition 8-16-2017, Trail 8-28-2018

In the Northern District Court of Mississippi, Greenville Division
Brenda J. Cooper, et al., Plaintiffs, vs. Meritor Inc., et al., Defendants
Case No. 4:16-cv-52-DMB-JVM
Rosenfeld Deposition July 2017

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In The Superior Court of the State of Washington, County of Snohomish
Michael Davis and Julie Davis et al., Plaintiff vs. Cedar Grove Composting Inc., Defendants
Case No. 13-2-03987-5
Rosenfeld Deposition, February 2017
Trial March 2017

In The Superior Court of the State of California, County of Alameda
Charles Spain., Plaintiff vs. Thermo Fisher Scientific, et al., Defendants
Case No. RG14711115
Rosenfeld Deposition September 2015

In The Iowa District Court In And For Poweshiek County
Russell D. Winburn, et al., Plaintiffs vs. Doug Hoksbergen, et al., Defendants
Case No. LALA002187
Rosenfeld Deposition August 2015

In The Circuit Court of Ohio County, West Virginia
Robert Andrews, et al. v. Antero, et al.
Civil Action No. 14-C-30000
Rosenfeld Deposition June 2015

In The Iowa District Court for Muscatine County
Laurie Freeman et. al. Plaintiffs vs. Grain Processing Corporation, Defendant
Case No. 4980
Rosenfeld Deposition May 2015

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In the Circuit Court of the 17th Judicial Circuit, in and For Broward County, Florida
Walter Hinton, et. al. Plaintiff, vs. City of Fort Lauderdale, Florida, a Municipality, Defendant.
Case No. CACE07030358 (26)
Rosenfeld Deposition December 2014

In the County Court of Dallas County Texas
Lisa Parr et al, Plaintiff, vs. Aruba et al, Defendant.
Case No. cc-11-01650-E
Rosenfeld Deposition: March and September 2013
Rosenfeld Trial April 2014

In the Court of Common Pleas of Tuscarawas County Ohio
John Michael Abicht, et al., Plaintiffs, vs. Republic Services, Inc., et al., Defendants
Case No. 2008 CT 10 0741 (Cons. w/ 2009 CV 10 0987)
Rosenfeld Deposition October 2012

In the United States District Court for the Middle District of Alabama, Northern Division
James K. Benefield, et al., Plaintiffs, vs. International Paper Company, Defendant.
Civil Action No. 2:09-cv-232-WHA-TFM
Rosenfeld Deposition July 2010, June 2011

In the Circuit Court of Jefferson County Alabama
Jaeanette Moss Anthony, et al., Plaintiffs, vs. Drummond Company Inc., et al., Defendants
Civil Action No. CV 2008-2076
Rosenfeld Deposition September 2010

In the United States District Court, Western District Lafayette Division
Ackle et al., Plaintiffs, vs. Citgo Petroleum Corporation, et al., Defendants.
Case No. 2:07CV1052
Rosenfeld Deposition July 2009

Response to Comment Letter O3 - Golden State Environmental Justice Alliance, c/o Blum, Collins & Ho LLP
Gary Ho

O3-1 This comment includes introductory statements and a request to be added to the public interest list. As requested, the City has added the Commenter and Golden State Environmental Justice Alliance to the Project's public interest list. No further response is warranted.

O3-2 This comment includes a summary of the Project's description. No further response is warranted.

O3-3 A floor plan, detailed elevations, and conceptual grading plan are included in the Project's Planning Application. The colored elevations in the EIR depict the conceptual building based on the detailed elevations submitted during the planning application process. A floor plan and detailed elevations were not included in the Draft EIR, nor are they required to be included, since it is not necessary to fulfill the purpose of the Draft EIR to provide information of the Project's environmental impacts caused during construction and operations of the Project. Draft EIR Section 2.0, Project Description pages 2-3 and 2-4 sets forth the Project's height, floor area, parking spaces, and other detailed Project information, including a Project narrative. Lastly, a legend depicting the Project information is already provided in Draft EIR Exhibit 2-5, Overall Site Plan so the legend was not reiterated in Exhibits 2-6 and 2-7.

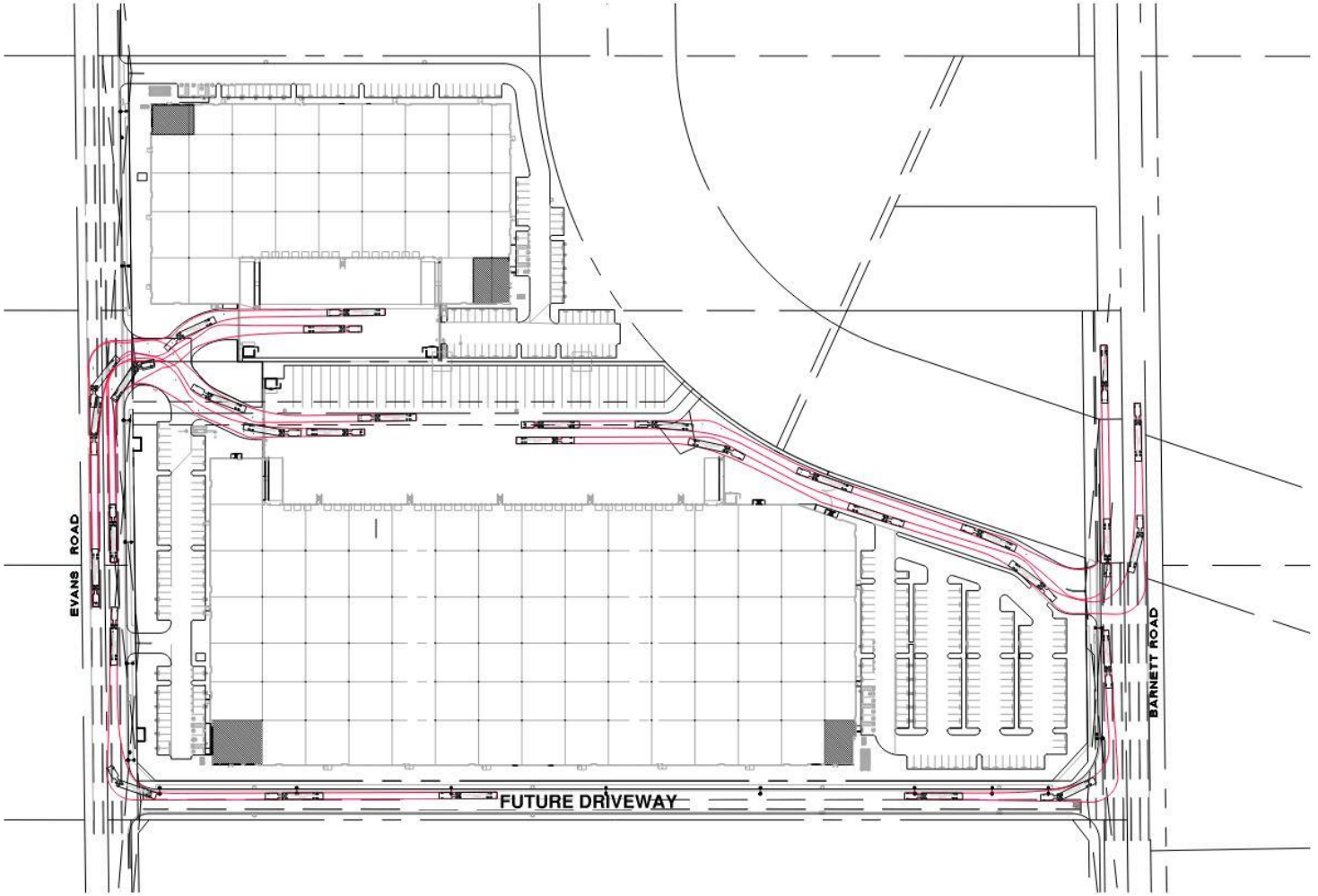
O3-4 Refer to **Section 3.0, Errata to the Draft EIR** of this FEIR that includes new **Exhibit 4.15-1, Conceptual Utility Plan** that illustrates the relocation of the underground flood channel (Line A-8) north of Building 2, and supplemental text that clearly explains the relocation of Line A-8. Additionally, the relocation of Line A-8 would occur within the Project site and is therefore not an off-site utility improvement. Off-site improvements incorporated into the analysis include improvements to Evans Road and Barnett Road. Therefore, all improvements, both on-site and off-site, have been incorporated into the air quality, GHG, and noise analysis for the Project.

O3-5 Pursuant to the comment, **Exhibits 2-11** through **2-13,** depicting the Project's conceptual grading were created and have been provided in **Section 3.0** of this FEIR. Additionally, the Draft EIR Section 2.0 already includes the Project's projected earthwork (page 2-4).

O3-6 As discussed in Response to Comment O3-4, information regarding the relocation of the underground flood channel (Line A-8). The corrected reference is provided in **Section 3.0** of this FEIR. Additionally, refer to Response to Comment O3-3 for information regarding floor plans, site plan, and elevations. Lastly, the relocation of Line A-8 was factored in the earthwork quantities, as illustrated in **Exhibit 2-11**.

O3-7 The Commenter states that the list of off-site improvements does not provide sufficient details or state the extent the off-site improvements but doesn't further explain why the off-site discussion is insufficient. The Commenter also incorrectly states that Evans Road from Ethanac Road to McLaughlin Road needs to be constructed in order to serve the Project. As discussed in Draft EIR Section 3.0 pages 2-3 and 2-4, the Project's proposed off-site improvements under Evans Road includes but is not limited to asphalt concrete pavement at the Project frontage. While the Project

site is described as 20.17 acres of land on page 2-3 of the Draft EIR, modeling for the Project included 22.35 acres in order to cover all off-site improvements. As a result, all improvements, both on-site and off-site, have been incorporated in the air quality, GHG, and noise analysis of the Project. Further, refer to FEIR **Exhibit O3-1: Truck Turning** below that illustrates which portions of Evans Road would be improved to allow trucks to enter the site.



Source: Thienes Engineering, Inc. (2024). Truck Turning Exhibit

Exhibit O3-1: Truck Turning
City of Menifee
Northern Gateway Logistics Center

Not to Scale

Kimley»Horn

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O3-8 The incorrect reference of future private driveway as "A Street" in the Draft EIR Project Description has been revised, including revisions to Draft EIR Exhibit 2-7 (refer to **Section 3.0** of this FEIR). The future driveway is located within the Project site boundaries and is not considered an off-site improvement. Additionally, the relocated underground flood channel, currently traversing the southern portion of the Project site, would be relocated within the Project site and is not considered an off-site improvement. Therefore, all improvements, both on-site and off-site, have been incorporated into the air quality, GHG, and noise analysis for the Project. Refer to **Section 3.0** of this FEIR for further information regarding the underground flood channel and Responses to Comments O3-3 through O3-5.

O3-9 The commenter refers to an attachment from SWAPE. The comment does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue. The comment has been noted and no further response is warranted.

O3-10 The commenter suggests the Draft EIR does not include relevant environmental justice issues, including cumulative impacts. The commenter cites to several statistics from CalEnviroScreen regarding ozone, PM 2.5, and traffic in the Project's census tract. As discussed in Appendix B2 (Health Risk Assessment), CalEnviroScreen and the environmental justice factors are disclosed on pages 11-12. CEQA does not require consideration of potential implications to environmental justice or socioeconomics as a specific resource, further, environmental justice is not listed within the "Environmental Factors Potentially Affected" in Appendix G, Environmental Checklist Form, to the CEQA Guidelines. Furthermore, as discussed within the Draft EIR, the proposed Project would not result in significant and unavoidable air quality impacts. Localized air quality impacts would be less than significant. Therefore, even if the topic of environmental justice was a required topic within the "Environmental Factors Potentially Affected" in Appendix G, Environmental Checklist Form, there would not be impacts to local residents as a result of approval of the proposed Project. This comment is noted and will be provided to the decision makers for review and consideration. Because the comment does not raise a substantive issue on the content of the Draft EIR, no further response is warranted.

O3-11 The comment provides demographic data. The comment does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue. This comment is noted and will be provided to the decision makers for review and consideration.

O3-12 The commenter states that the census tract adjacent to the Project site is identified as a SB 535 Disadvantaged Community. SB 535 established initial requirements for minimum funding levels to "Disadvantaged Communities" (DACs). The legislation also gives California EPA the responsibility for identifying those communities, stating that the designation of disadvantaged communities must be based on "geographic, socioeconomic, public health, and environmental hazard criteria." These funds must be used for programs that further reduce greenhouse gas emissions. SB 535 does not include project-specific requirements or prohibit developments in proximity to the designated communities. The comment does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue. This comment is noted and will be provided to the decision makers for review and consideration.

O3-13 The commenter states that CalEEMod is not listed as an approved Title 24 compliance energy modeling software. With specific regard to the use of CalEEMod for the purposes of modeling energy consumption, the Lead Agency has historically and successfully employed CalEEMod for this purpose. Further, the SCAQMD, the expert commenting agency for air quality considerations, endorses use of CalEEMod to provide a "uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions associated with both construction and operational from a variety of land use projects." Through the use of CalEEMod, SCAQMD integrates air quality and energy impact analyses.[5] To ensure consistency of and accuracy of analyses in support of SCAQMD policies, the Lead Agency has determined that CalEEMod is appropriate for CEQA modeling of both air quality impacts and energy consumption.

The energy modeling protocols cited by the commenter (CBECC-Com, EnergyPro, and IES VE) are used for the performance approach (energy budget) method for demonstrating compliance with the Title 24 Energy Standards. The analysis in EIR Section 4.5 discloses the amount of energy that the Project would require and is not intended or required to demonstrate compliance for Title 24 energy standard performance.

Additionally, the EIR discloses the Project's electricity consumption and transportation fuel consumption and determined that the Project's energy consumption would not be inefficient or wasteful as the Project will be required to comply with the Title 24 Nonresidential Building Energy Efficiency Standards and CALGreen standards published by the CEC, which contain stringent mandatory standards for mechanical systems, lighting (indoor and outdoor), and appliances to minimize energy use. Therefore, the Project used the appropriate model to calculate and disclose the Project's energy use, and also demonstrated that the Project would be required to comply with 2022 Title 24 Building Energy Efficiency and CALGreen Standards. The findings and conclusions of the EIR are not affected; no revisions are necessary.

O3-14 Refer to Response O3-13.

O3-15 The commenter reports that without mitigation, the Project's GHG emissions would exceed the GHG threshold and that **MM GHG-1** and **MM GHG-2** are required to reduce emissions to less than significant. The comment does not raise a specific issue with the adequacy of the Draft EIR or raise any other CEQA issue. The comment has been noted and no further response is warranted.

O3-16 The commenter repeats the requirements of **MM GHG-1** and does not raise a specific issue with the adequacy of the Draft EIR. The comment has been noted and no further response is warranted.

O3-17 The commenter repeats the requirements of **MM GHG-2** and does not raise a specific issue with the adequacy of the Draft EIR. The comment has been noted and no further response is warranted.

[5] https://www.aqmd.gov/caleemod/home

O3-18 It is the commenters opinion that **MM GHG-1** and **MM GHG-2** will not result in GHG emission reductions. GHG emissions for the Project were modeled using CalEEMod 2022. CalEEMod is a statewide land use emissions computer model designed to quantify potential criteria pollutant and GHG emissions associated with both construction and operations from a variety of land use projects. The unmitigated emissions for the Project includes equipment and/or appliances typically associated with a warehouse project of this size. **MM GHG-1** prohibits the installation of natural gas lines, as a result the Project would not generate any emissions associated with natural gas, hence **Table 4.7-3** shows 0 (zero) emissions from "energy-natural gas" under the mitigated column. **MM-GHG-2** requires all cargo handling equipment to be powered by electricity or other alternative fuels. As a result, emissions from diesel powered forklifts and yard trucks have been reduced from 350 MTCO2e to 79 MTCO2e per year under the mitigated column. **MM GHG-1** and **MM GHG-2** include clear performance standards and enforcement mechanisms (e.g., the Project Applicant must provide evidence to the City prior to issuance of building or occupancy permits) for the City to verify that the analyzed reductions will be achieved. The EIR's Mitigation Monitoring and Reporting Program will ensure that these mitigation measures are implemented and enforced.

O3-19 The commenter notes that the Project is a speculative warehouse and the need for cargo handling equipment is unknown, however based on the size of the buildings it can be assumed that some form of cargo handling equipment will be needed. The estimated number of cargo handling equipment modeled for the Project was calculated based on the size of the warehouse using the formulas identified in the *SCAQMD High Cube Warehouse Truck Trip Study White Paper Summary of Business Survey Results*. Using this methodology, the analysis conservatively assumed the Project would employ eight diesel forklifts and one diesel yard truck. However, regardless of the number, **MM GHG-2** would require all cargo handling equipment used on site to be electric or use alternative fuels, resulting in reduced emissions. Although the proposed warehouses are speculative, any future occupant would be required to use zero emission cargo handling equipment, if such equipment is necessary. This measure is tied to the issuance of occupancy permits and would be verified by the City. Future tenants would not be permitted to occupy the Project site unless compliance with the mitigation can be demonstrated.

O3-20 Refer to Response to Comments O3-18 and O3-19. The comment incorrectly concludes that the mitigation cannot be assured. As described above, the mitigation measures have clear performance standards and are tied to issuance of City building and occupancy permits. Therefore, the City has a mechanism to verify the measures are incorporated.

O3-21 After review of the Perris Valley ALUCP Compatibility Map, correct reference to the Project site being within the Perris Valley Airport ALUCP Compatibility Zone E has been made in **Section 3.0** of this FEIR. Please note that this correction does not change the Draft EIR's significance conclusion of "less than significant impact" concerning the Project resulting in a safety hazard or excessive noise for people residing or working in the Project area.

O3-22 Information regarding ALCU information for Perris Valley ALUCP has been added in **Section 3.0** of this FEIR. However, the Commenter incorrectly references that the EIR does not provide any

analysis or information regarding regulations and requirements within influence area Zone E of the Perris Valley or March Air Reserve Base (MARB) ALUCPs. As stated in Draft EIR Section 4.8, Hazards and Hazardous Materials page 4.8-27, the Project contains a condition of approval (COA HAZ-1) in consistency with MARB and Perris Valley ALUCP requirements. Furthermore, since the Project is within Zone E of the Perris Valley and MARB ALUCP, and does not propose any legislative action (e.g., general plan amendment or zone change), review by Riverside County ALUC is not required, and can be conducted by the City. Therefore, the sentence from the Draft EIR that states, "All new development would be in accordance with the Compatibility Zone E and all state, county, and local goals, policies, and regulations" indicates that the Project would be developed in accordance with relevant City regulations and design guidelines to minimize safety hazards and noise impacts during the Project's construction and operational phases Therefore, no further analysis is required as impacts would remain less than significant with addition of the Perris Valley ALUCP discussion.

O3-23 Exhibit LU-4 also states in the Notes section that citywide build-out levels historically do not achieve the maximum allowable density/intensity on every parcel, and on average are lower than allowed by the Menifee GP. However, the build-out estimates in the Menifee GP assume variations in the build-out intensity. Therefore, if based on the average, as it states, in some instances the FAR will be higher than the 0.40 FAR, which offsets projects that might be over the FAR. In addition, the GP allows for a maximum of 1.0 FAR. Additionally, pursuant to Menifee GP FEIR, land assumptions were not site specific, and the EDC land use designation was generally envisioned for a mixture of residential, commercial, office, industrial, entertainment, educational, recreational uses, and/or other uses. Accordingly, the Project is not inconsistent with the GP buildout scenario, RTP/SCS and AQMP.

O3-24 The Commenter states that the Project, due to errors in modeling and modeling without supporting evidence, is not consistent with SCAG's Connect SoCal Goals 5 through 7. The air quality and greenhouse gas emissions have been modeled in CalEEMod using the approved methodology identified in the CalEEmod User Handbook. The commenter suggests there are errors in the modeling but does not identify them. The commenter also suggests that the Project is inconsistent with RTP/SCS Goals 5, 6, and 7 but provides no evidence. All air quality and greenhouse gas impacts identified in the Draft EIR have been reduced to less than significant with mitigation. Therefore, the Draft EIR presents substantial evidence that the Project is consistent with RTP/SCS Goals 5,6, and 7. The Draft EIR has determined that Project is consistent with all applicable RTP/SCS goals as shown in **Table 4.7-4 of the Draft EIR**.

O3-25 The City respectfully disagrees that the Draft EIR does not provide a consistency analysis with applicable goals, policies, and regulations for the Project. Goal S-7 and Policy S-7.1 refer to climate change and GHG emissions. Consistent with Goal S-7 and Policy S-7.1 a GHG Emissions Assessment was prepared to identify and inform the City of GHG impacts. Policy EJ-3.6 refers to continuing to collaborate with SCAQMD, CARB, SCAG, and WRCOG that would be conducted by the City, and therefore not Project-specific. The commenter does not state how the Draft EIR is not consistent with Policy C-5.3. The Project would comply with Goal OSC-10 since the Project includes

implementation of **MMs GHG-1** and **GHG-2** and compliance with local, state, or federal regulations or laws to reduce mitigation GHG emissions to less than significant levels. Pursuant to Policy OSC-10.1, the Draft EIR page 4.7-256 includes a discussion regarding the Project's consistency with the 2022 CARB Scoping Plan. Policies OCS-10.2 through OCS-10.3 would also be conducted by the City, and not by the Project applicant.

The commenter suggests that the Draft EIR does not show consistency with the City of Menifee General Plan. However, all applicable goals and policies in the General Plan are discussed on pages 4.7-23 and 4.7-24 of the Draft EIR. The commenter then lists goals and policies from the General Plan that are either not applicable or have already been discussed in the Draft EIR.

1. Goal S-7: This goal is relevant to city planning and is beyond the scope of the Project. Therefore, this goal is not applicable to the Project. However, development of the Project would not conflict with this Goal because all impacts associated with air quality and GHG, including those associated with health risk and sensitive receptors, have been reduced to less than significant with mitigation.
2. Policy S-7.1: This is a policy relevant to city planning and is beyond the scope of the Project. Therefore, this policy is not applicable to the Project. However, the preparation of the Draft EIR provides the environmental analysis the City seeks to achieve by implementing Policy S-7.1.
3. Policy EJ-3.6: This is a policy relevant to city planning and is beyond the scope of the Project. Therefore, this policy is not applicable to the Project. However, development of the Project would not conflict with this policy.
4. Policy C-5.3: This is a policy relevant to city planning and is beyond the scope of the Project. Therefore, this policy is not applicable to the Project. However, the Project will comply with all applicable laws and regulations, including those that will reduce/eliminate the negative environmental impacts of goods movement.
5. Goal OSC-10: This goal is relevant to city planning and is beyond the scope of the Project. Therefore, this goal is not applicable to the Project. However, development of the Project would not conflict with this goal.
6. Policy OSC-10.1: Consistent, refer to page 4.7-23 of the Draft EIR.
7. Policy OSC-10.2: Consistent, refer to page 4.7-24 of the Draft EIR.
8. Policy OSC-10.3: Consistent, refer to page 4.7-24 of the Draft EIR.
9. Policy OSC-10.4: Consistent, refer to page 4.7-24 of the Draft EIR.
10. Policy C-5.3: Refer to number 4 of this list.

O3-26 The commenter summarizes an excerpt from the Project Traffic Impact Analysis that recommended improvements for various deficient intersections, but the comment does not raise

any deficiencies with the analysis or conclusions. Comment has been noted, and no further response is warranted.

O3-27 Under CEQA Guidelines Section 15064.3, LOS associated with automobile delay no longer constitutes a significant environmental impact, and therefore this comment does not raise concerns within the scope of CEQA. The analysis included in the Draft EIR concerning these proposed improvements was provided for informational purposes only for the City's use in evaluating the Project and considering conditions of approval outside of CEQA's framework. The implementation of these improvements would be based on direct discussion between City staff and the Applicant and would be imposed via the Conditions of Approval process, not through CEQA. Further, the Project's land use impacts are based in part upon determining compliance with the City's General Plan. The Project Applicant is proposing to improve roadways along the Project's frontage per the City of Menifee General Plan. All roadway improvements associated with the Project would be consistent with the City of Menifee General Plan Circulation Element. Any improvements to portions of intersections or roadways shared with the City of Perris would be coordinated between the City of Menifee and City of Perris prior to final offsite engineering for the Project.

O3-28 See Response to Comment O3-26.

O3-29 See Response to Comment O3-27.

O3-30 Based on the State Office of Planning and Research (OPR) Technical Advisory (page 4), "'vehicle miles traveled' refers to the amount and distance of automobile travel attributable to a project," where automobile refers to passenger vehicles, specifically cars and light trucks. VMT generated from trucks are not considered in the VMT impact assessment based on the OPR Technical Advisory. The proposed facility does not anticipate delivery van trips. However, if the Project were to implement delivery vans, it would likely result in a net decrease in regional VMT, as these projects are strategically located near delivery points, thereby reducing trip lengths by providing additional regional warehouses.

O3-31 The Project's land use impacts are based in part upon determining compliance with the City's General Plan. The Project Applicant is proposing to improve roadways along the Project's frontage per the City of Menifee General Plan. All roadway improvements associated with the Project, including Project driveways and emergency access, would be consistent with the City of Menifee General Plan Circulation Element and the City of Menifee Road Improvement Standards and Specifications (Design Standards, 2019). Site access, including curb radii, driveway width, and truck turn design, will be designed consistent with City Design Standards to provide adequate maneuvering and queuing space for trucks/trailers on-site, as well as at the intersection of project driveways and adjacent streets. A copy of the project site plan with applicable truck-turning templates is provided as an attachment to this FEIR. As shown in the truck-turning templates, driveways, truck turning would be sufficient at a 45-foot radius and the Project is subject to the following condition:

Condition #115. Driveways - Final driveway geometrics may be modified in final engineering as approved by the Public Works Director / City Engineer. Driveways shall meet current standard radii on all existing and proposed commercial drive approaches used as access to the proposed development. The developer shall adhere to all City standards and regulations for access and ADA guidelines. As outlined in the following conditions, medians may be required to restrict turning movements for public safety purposes as determined by the Public Works Director / City Engineer.

As noted in discussion in page 4.13-19 of the Draft EIR, in compliance with Riverside County Fire Department (RCFD) access requirement, adequate emergency access would be provided by the Project. It should be noted that the roadways serving the project site are generally straight and flat. The project driveways have been designed so that adequate sight distance for drivers entering and exiting the site is maintained. Based on the items noted in this response and page 4.13.19 of the Draft EIR, the Project would improve sight distance and safety conditions in the area and would not create hazards due to geometric design features.

O3-32 See Response to Comment O3-31. No further response is warranted.

O3-33 All roadway improvements associated with the Project, including Project driveways and emergency access, would be consistent with the City of Menifee General Plan Circulation Element and the City of Menifee Road Improvement Standards and Specifications (Design Standards, 2019) As noted in the discussion on page 4.13-19 of the Draft EIR, in compliance with Riverside County Fire Department (RCFD) access requirement, adequate emergency access would be provided by the Project. It should be noted that the roadways serving the project site are generally straight and flat. The project driveways have been designed so that adequate sight distance for drivers entering and exiting the site is maintained. Based on the items noted in this response and Section 4.13.19 of the Draft EIR, the Project would improve sight distance and safety conditions in the area and would not create hazards due to geometric design features.

O3-34 The roadways serving the Project site are generally straight and flat, with no visual obstructions. Therefore, there is no evidence that driver visibility will be inadequate and the commenter has not provided evidence otherwise. Accordingly, no further analysis of sight distance is warranted.

O3-35 Refer to Response to Comment O3-13 above.

O3-36 Refer to Response to Comment O3-23 above.

O3-37 The City respectfully disagrees that the Draft EIR does not include a meaningful discussion of potential growth inducing impacts. Section 15126 of the CEQA Guidelines requires that an EIR address the "growth inducing" effects of the Project. Pursuant to § 15126.2(d) of the Guidelines, a project would be considered to have a growth-inducing effect if it would:

- Directly or indirectly foster economic or population growth, or the construction of additional housing;
- Remove obstacles to population growth;

- Tax existing community services or facilities, requiring the construction of new facilities that could cause significant environmental effects; or
- Encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively.

As discussed in detail in Draft EIR Chapter 5, Other CEQA Considerations, the Project would not induce employment growth projected in SCAG's Connect SoCal. Utilizing SCAGs Employment Density Study 1 employee per square feet per employee (581 for warehousing; 481 for Office) in Riverside County, the Project could potentially create approximately 692 permanent job opportunities. This would represent 4.5 percent of employment growth. The Project's proposed uses are consistent with the Economic Development Corridor – Northern Gateway land use designation which accounted for warehouse development. For the reasons discussed in the Draft EIR Section 5.0, the Project's employee base is expected to come from within the city or immediately surrounding region and would not require new housing; would have no effect on stimulating population growth; and provides sufficient infrastructure to meet its needs concurrent with development. Lastly, data from the Joint Center for Housing Studies of Harvard University found that approximately 13 percent of Americans move each year, and of those 21 percent move for job-related reasons. 13 percent of 692 is 90 people and 21 percent of 90 people is approximately 19 people. Therefore, the Project could potentially generate approximately 19 new residents in the City Menifee which represents approximately 0.07 percent of the City's population growth forecast of 129,800 people by 2045.

O3-38 This is a direct quote from Draft EIR Section 7.4-1. No further comments were made here and therefore, no further response is warranted.

O3-39 The Commenter provides no substantial evidence of a significant environmental impact. The Project would not result in cumulative citywide or countywide population and housing impacts. The term local area encompasses the City, unincorporated County area, and surrounding communities, such as Perris and Murrieta due to a high unemployment rate, currently at 5.7 percent for the City of Menifee, and 5.2 percent for the County of Riverside. Furthermore, the Project's potential employment opportunities would provide much needed employment within the City and support the City's pursuit in a more balanced jobs-housing ratio. The Project VMT Analysis was conducted consistent with the City of Menifee *Traffic Impact Analysis Guidelines for Vehicles Miles Traveled* (VMT Guidelines, January 2022). The Project VMT Analysis concluded that the Project's Employment-Based VMT does not exceed the City's VMT threshold and that the project would have a less-than=significant VMT impact.

O3-40 The Comment provides no supporting evidence of how a qualified or interested workforce versus an unqualified workforce would impact VMT, and therefore a calculation of longer worker trips is not warranted. Additionally, the commenter does not provide any supporting evidence that an unemployment rate below 5 percent is considered full employment.

O3-41 Refer to **Section 3.0** of this FEIR for information regarding the Project's potential employment growth.

O3-42 Refer to Response to Comment O3-41 above. Additionally, the comment mistakenly references this document as a mitigated negative declaration, and states that an EIR must prepared. This comment is not applicable to this project.

O3-43 The Commenter fails to specify why the sentence provided by the commenter needs to be deleted. Draft EIR Sections 4.9, Hydrology and Water Quality and 4.15, Utilities and Service Systems go in depth about the potential utility infrastructure that would be needed to service the Project. As discussed in Response to Comment O3-8, the reference to "Street A" has been corrected. Additionally refer to **Section 3.0** of the FEIR for a conceptual utility figure that depicts proposed on- and off-site utility improvements. Lastly, the commenter incorrectly states that "50% of the land within the vicinity of the project site is vacant, meaning that the project site is not located in a developed area of the City" without pointing to this reference in the Draft EIR. Draft EIR Section 7.0 states multiple times that the Project is located in a partially developed portion of the City which is accurate Lastly, the Project is located between Evans Road which is a dirt road that can currently be used to access the Project site, and Barnett Road that is currently developed.

O3-44 Refer to Response to Comment O3-37.

O3-45 This comment includes conclusionary statements, and therefore no further response is warranted.

O3-46 This comment is noted for the record and will be provided to the decision makers for review and consideration. However, responses to comments for further information regarding the commenter's comments regarding AQ, GHG, Hazards and Hazardous Materials, and transportation are provided in Response to Comments O3-4, O3-7 through O3-20, O3-24 through O3-25, O3-26 through O3-34, and O3-39. Refer to those responses for more further details.

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Comment Letter T1 - Agua Caliente Band of Cahuilla Indians

Luz Salazar, Cultural Resources Analyst

Comment Letter - T1

AGUA CALIENTE BAND OF CAHUILLA INDIANS

TRIBAL HISTORIC PRESERVATION

03-057-2023-004

July 23, 2024

[VIA EMAIL TO:bcleary@cityofmenifee.us]
City of Menifee
Mr. Brandon Cleary
29844 Haun Road
Menifee, California 92586

Re: Plot Plan PLN23-0040 Menifee Logistics Warehouses DEIR

Dear Mr. Brandon Cleary,

The Agua Caliente Band of Cahuilla Indians (ACBCI) appreciates your efforts to include the Tribal Historic Preservation Office (THPO) in the Menifee Logistics Warehouses project. We have reviewed the documents and have the following comments:

* Please review the comments I have made on the document.

1

Again, the Agua Caliente appreciates your interest in our cultural heritage. If you have questions or require additional information, please call me at (760) 883-1137. You may also email me at ACBCI-THPO@aguacaliente.net.

Cordially,

Luz Salazar
Cultural Resources Analyst
Tribal Historic Preservation Office
AGUA CALIENTE BAND
OF CAHUILLA INDIANS

vacant land. The location of the Project in both regional and local contexts are further identified in **Section 2.0: Project Description** and in **Exhibit 2-1: Regional Location** and **Exhibit 2-2: Local Vicinity Map**.

ES.3 Project Description

The Project proposes the development of two concrete tilt up warehouses on 20.17 acres of land. Building 1 is proposed to be 105,537 square feet (sq. ft.) consisting of 6,000 sq. ft. of office space and 99,537 sq. ft. of warehouse space and is located on the north side of the site. Building 2 is on the southern end of the site and is proposed to be 292,715 sq. ft. consisting of 8,000 sq. ft of office space, 7,000 sq. ft. of mezzanine, and 277,715 sq. ft. of warehouse area, for a combined 398,252 sq. ft. of total building area. Associated facilities and improvements of the Project site includes loading dock doors (15 for Building 1; 37 for Building 2), on-site landscaping, and related on-site and off-site improvements (including relocation of an underground flood channel). The Project also includes various discretionary approvals including applications for a Major Plot Plan (PLN23-0040). These actions are described in greater detail in EIR **Section 2.0: Project Description**. Project background and objectives are also discussed in **Section 2.0**. 2

ES.4 Significant Unavoidable Impacts

The Project's potentially significant impacts are discussed in **Section 4.1: Aesthetics** through **Section 4.15: Utilities and Service Systems** of this Draft EIR. As noted in these sections, all of the potentially significant impacts can be mitigated to a less than significant level through implementation of Project design features, standard conditions, and feasible mitigation measures.

ES.5 Alternatives to the Project

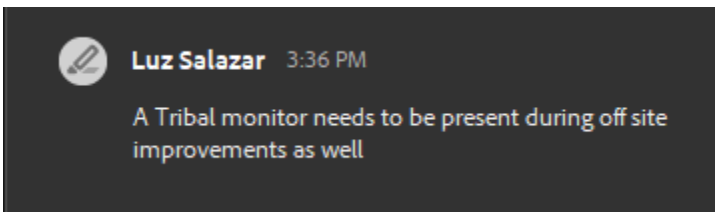
State CEQA Guidelines § 15126.6(a) requires a Draft EIR to "describe the range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but will avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives." In response to the potentially significant impacts that were identified, the EIR includes the following alternatives for consideration by decision-makers upon action related to the Project:

Alternative 1: No Project Alternative

The purpose of describing and analyzing a No Project Alternative is to allow decision-makers the ability to compare the impacts of approving the Project with impacts of not approving the Project. The No Project Analysis is required to discuss the existing conditions (at the time the Notice of Preparation was published on June 20, 2023), as well as what would be reasonably expected to occur in the foreseeable future, if the Project were not approved, based on current plans and consistent with available infrastructure and services.

Under the No Project Alternative, the

- The Applicant would not improve the site with the two concrete tilt-up buildings and associated infrastructure improvements, and the site would remain undeveloped.



A search of the Sacred Lands File (SLF) for the Project site was completed by the Native American Heritage Commission (NAHC), and the search had negative results. BCR Consulting sent letters to local tribes listed by the NAHC to discern whether tribes were aware of resources within the Project site boundaries. The City conducted tribal consultation in compliance with Assembly Bill (AB) 52 and has received responses from the Rincon Band of Luiseño Indians and Pachanga Band of Indians. Copies of all tribal responses and AB 52 consultation letters can be found in **Appendix D** and are discussed further in **Section 4.14: Tribal Cultural Resources**. 3

Field Survey

During the field survey, archaeologists carefully inspected the Project site for evidence of cultural resources, using the methods described above. Access was limited in about five percent of the total Project area, due to a small section of the eastern portion having been flooded. Ground visibility varied from approximately 70 percent within the northern half of the Project site to zero percent throughout much of the southern half of the Project area due to dense vegetation including seasonal grasses and mustard plants. Sediments comprised of dark brown silty sand with less than 15 percent granitic cobbles present. The Project site has been subject to mechanical clearing and discing for weed abatement, as well as being habitat for burrowing animals. Some modern irrigation equipment was identified in the form of two risers on the western extent of the Project area. No historic-period or prehistoric archaeological resources or historic-period built environment resources were identified within the Project site.

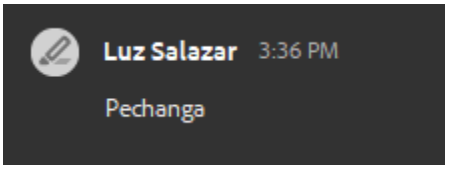
4.4.3 Regulatory Setting

Federal

National Historic Preservation Act

The National Historic Preservation Act (NHPA) was passed in 1966 and is codified in Title 16, Section 470 et seq. of the U.S. Code (USC). The goal of the Act is to ensure federal agencies act as responsible stewards of our nation's resources when their actions affect historic properties. Among the regulations of the NHPA, Section 106 requires federal agencies to consider the effects of their undertakings on historic properties and afford the Advisory Council on Historic Properties (ACHP) a reasonable opportunity to comment. The historic preservation review process mandated by Section 106 is outlined in regulations issued by ACHP. See Title 36 Code of Federal Regulations (CFR) Part 800, "Protection of Historic Properties."

Section 106 applies when two thresholds are met: 1) there is a federal or federally licensed action, including grants, licenses and permits, and 2) that action has the potential to affect properties listed in or eligible for listing in the NRHP. Section 106 requires each federal agency to identify and assess the effects of its actions on historic resources. The responsible federal agency must consult with appropriate state and local officials, Indian Tribes, applicants for federal assistance and members of the public, and consider their views and concerns about historic preservation issues when making final project decisions. The agency should also plan to involve the public and identify any other potential consulting parties. If the agency determines that it has no undertaking or that its undertaking is a type of activity that has no potential to affect historic properties, the agency has no further Section 106 obligations.



- dark, greasy soil that may be associated with charcoal, ash, bone, shell, flaked stone, groundstone, and fire affected rocks;
- human remains;
- historic-period artifacts such as glass bottles and fragments, cans, nails, ceramic and pottery fragments, and other metal objects;
- historic-period structural or building foundations, walkways, cisterns, pipes, privies, and other structural elements.

Monitoring of future earth-disturbing activities would be conducted according to Standard Conditions of Approval (COA) COA CUL-1 through COA CUL-6. Lastly, a record search of the NAHC SLF was completed for the area of potential effect, "the Project site," and the search returned negative results. Therefore, the Project's potential impacts concerning the significance of a cultural resource are determined to be less than significant.

Standard Conditions of Approval

COA-CUL-1 **Inadvertent Archaeological Find**. If during ground disturbance activities, unique cultural resources are discovered that were not assessed by the archaeological report(s) and/or environmental assessment conducted prior to project approval, the following procedures shall be followed. Unique cultural resources are defined, for this condition only, as being multiple artifacts in close association with each other, but may include fewer artifacts if the area of the find is determined to be of significance due to its sacred or cultural importance as determined in consultation with the Native American Tribe(s). 4

a. All ground disturbance activities within 100 feet of the discovered cultural resources shall be halted until a meeting is convened between the developer, the archaeologist, the tribal representative(s) and the Community Development Director to discuss the significance of the find.

b. At the meeting, the significance of the discoveries shall be discussed and after consultation with the tribal representative(s) and the archaeologist, a decision shall be made, with the concurrence of the Community Development Director, as to the appropriate mitigation (documentation, recovery, avoidance, etc.) for the cultural resources.

c. Grading of further ground disturbance shall not resume within the area of the discovery until an agreement has been reached by all parties as to the appropriate mitigation. Work shall be allowed to continue outside of the buffer area and will be monitored by additional Tribal monitors if needed.

d. Treatment and avoidance of the newly discovered resources shall be consistent with the Cultural Resources Management Plan and Monitoring Agreements entered into with the appropriate tribes. This may include avoidance of the cultural resources through project design, in-place preservation of cultural resources located in native soils and/or re-burial on the Project property so they

Luz Salazar 3:36 PM

Please elaborate this. All cultural resources are significant, not a select few.

Response to Comment Letter T1 - Agua Caliente Band of Cahuilla Indians
Luz Salazar, Cultural Resources Analyst

T1-1 This comment includes introductory and conclusion statements and refers the City to review comments made on the Draft EIR. Please review the following responses to the comments for further discussion.

T1-2 The comment stating that a "Tribal monitor needs to be present during off-site improvements" has been noted. COA-CUL-4 and COA-CUL-5 already require that a tribal monitor be present "on-site" or in person during all ground-disturbing activities ground disturbing activities within the Project site, and off-site improvement locations.

T1-3 The correct reference to spelling of "Pechanga" has been noted and corrected in **Section 3.0, Errata to the Draft EIR** of this FEIR**.**

TI-4 The Commenter is incorrectly referencing this COA by stating that all cultural resources are significant. The term "unique archeological resource" is defined in subdivision (g) of CEQA Guidelines Section 21083.2 as an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

(1) Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.

(2) Has a special and particular quality such as being the oldest of its type or the best available example of its type.

(3) Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Therefore, this COA will be implemented to specifically address impacts to unique archeological resources defined by CEQA, and is not intended to devalue the significance of nonunique cultural resources.

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Comment Letter P1 - *Breanna Harwood*

Comment Letter - P1

From: Breanna Harwood <bharwood@romoland.net>
Sent: Tuesday, June 25, 2024 3:15 PM
To: Brandon Cleary <bcleary@cityofmenifee.us>
Subject: Northern Gateway Logistics center

You don't often get email from bharwood@romoland.net. Learn why this is important

[CAUTION]: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello Brandon,
I purchased my home last year and am a resident in the Sagewood neighborhood, which is in close proximity to the proposed Northern Gateway Logistic center. If the warehouse is approved and built, it will be the view from my second-floor window. Had I been aware of this possibility, I would have opted for a different home. The thought of a warehouse being established so near to my residence raises numerous concerns. Some of the major worries include potential health hazards like cancer, effects on air quality, presence of hazardous materials, safety risks associated with living in close proximity to a warehouse, traffic congestion, noise pollution from the warehouse and employee vehicles, area overcrowding, negative impact on property resale due to the warehouse's proximity, general inconveniences stemming from the warehouse's closeness, environmental issues, light pollution, unattractive appearance of warehouse, alteration of the Sun City area's culture, encroachment on burrowing owl habitats, and the overall decline in quality of life for local residents. It is safe to say that no one would willingly choose to reside next to a warehouse. I am opposed to the construction of a warehouse in the proposed location and firmly believe that if the city of Menifee truly values its residents, it would recognize that the warehouse's proximity to residential areas and a retirement community is too close. The warehouse will not benefit the residents who will have to face the adversities that the warehouse will bring. As an educator who lives in and serves the surrounding community on a daily basis, I am certain that the establishment of this warehouse is not in the best interest of the surrounding neighborhoods. I am eager to receive more information on how to prevent the development of the proposed Northern Gateway Logistic center. Any guidance provided would be greatly appreciated. Thank you for taking the time to consider my concerns. Please do not hesitate to contact me at (951) 355-6880.
-Breanna Harwood

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Response to Comment Letter P1 - Breanna Harwood

P1-1 This comment does not raise any substantive issues regarding the adequacy of the Draft EIR. This comment is noted for the record and no further response is needed.

P1-2 The Commenter's concerns regarding the Project's impacts on aesthetic, air quality, health risk, biological resources, hazards materials, traffic congestion and noise pollution have been noted for the record, but this comment did not provide substantive evidence regarding the inadequacy of the aforementioned environmental topics analyses discussed in the Draft EIR. Additionally, home property values are not considered a CEQA issue, but this has also been noted for the record.

An air quality assessment and health risk assessment were both prepared to analyze health impacts associated with emissions from the Project.

- Construction Emissions. As shown in Table 4.2-8: Construction Related Emissions and Table 4.2-11: Localized Significance of Construction Emissions, all emissions generated during construction of the Project are below SCAQMD's construction thresholds.
- Operational Emissions. As shown in Table 4.2-9: Unmitigated Operational Emissions and Table 4.2-12: Localized Significance of Operational Emissions of the Draft EIR, all operational emissions are below SCAQMD's operational thresholds.
- Health Risk. With the incorporation of MM GHG-2, which requires all cargo handling equipment operating onsite to be electric or powered by alternative fuels, the cancer risk and chronic non-carcinogenic health impacts will be reduced below SCAQMD threshold levels as shown in Tables 4.2-13: Carcinogenic Risk Assessment and Table 4.2-14: Chronic Hazard Assessment of the Draft EIR.

The Draft EIR also analyzed the impacts of noise on the surrounding sensitive receptors.

- Construction Noise. As shown in Table 4.11-8: Project Construction Noise Levels of the Draft EIR, construction noise at the nearest sensitive receptor would not exceed the applicable noise threshold.
- Operational Noise. Operational noise levels, both daytime and nighttime, are below the applicable City noise standard as shown in Table 4.11-9: Project Operational Noise Levels of the Draft EIR. The operational noise analysis included noise generated from mechanical equipment, on-site traffic, and parking lot noise.
- Offsite Traffic Noise. Roadway noise was also analyzed and shown in Table 4.11-10: Project Traffic Noise Levels of the Draft EIR. As shown in Table 4.11-10, traffic noise levels would be less than significant.

The Draft EIR also analyzed impacts related to Aesthetics.

- Construction and Operations. Construction and operation of the Project would result in a less than significant impact concerning scenic vistas, and light and glare. No impacts from a CEQA perspective would occur concerning the confliction with applicable zoning and other regulations governing scenic quality and scenic resources within a state scenic highway.

The Draft EIR also analyzed impacts related to the burrowing owl species.

- Construction. As discussed further in Draft EIR Section 4.3, Biological Resources, despite a systemic search of the Project site, no burrowing owls or sign (pellets, feathers, castings, or whitewash) were observed on or within 500 feet, where accessible, of the Project site during the field investigation. However, based on a review of CDFW's CNDDB, 22 burrowing owl observations have been recorded within five miles of the Project site in previous years. Therefore, the Project would implement MM BIO-2 which would require the Project Applicant would retain a qualified biologist to conduct a 30-day preconstruction survey for burrowing owl. With implementation of MM BIO-2, impacts would be reduced to less than significant levels. (Draft EIR pages 4.3-14 through 4.3-16)

The Draft EIR also analyzed impacts related to hazards and hazardous materials.

- Construction and Operation. As discussed in Draft EIR Section 4.8, Hazards and Hazardous Materials, the Project would implement MM HAZ-1 to ensure proper handling of contaminated soils and substances which may be encountered during construction activities. Additionally, compliance with applicable laws and regulations concerning hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts during both construction and operations.

Concerning traffic congestion, Under CEQA Guidelines Section 15064.3, automobile delay no longer is considered an environmental impact, and therefore this comment does not raise concerns within the scope of CEQA. The analysis included in the Draft EIR concerning LOS was provided for informational purposes only for the City's use in evaluating the Project and considering conditions of approval outside of CEQA's framework.

P1-3 The Commenter's opposition to the Project has been noted for the record. Per the Commenter's request, the City will send the Commenter a public notice during distribution, prior to certification of this Final EIR.

Comment Letter P2 – *Jose Marquez*

Comment Letter P2

From: jose marquez <itsijose@gmail.com>
Sent: Tuesday, July 16, 2024 8:32 AM
To: Brandon Cleary
Subject: Northern Gateway

[You don't often get email from itsijose@gmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

[CAUTION]: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello Brandon,

I bought my home last year and am a resident in the Sagewood neighborhood, which is in close proximity to the proposed Northern Gateway Logistic center. If the warehouse is approved and built, it will be the view from my second-floor window. Had I been aware of this possibility, I would have opted for a different home. The thought of a warehouse being established so near to my residence raises numerous concerns. Some of the major worries include potential health hazards like cancer, effects on air quality, presence of hazardous materials, safety risks associated with living in close proximity to a warehouse, traffic congestion, noise pollution from the warehouse and employee vehicles, area overcrowding, negative impact on property resale due to the warehouse's proximity, general inconveniences stemming from the warehouse's closeness, environmental issues, light pollution, unattractive appearance of warehouse, alteration of the Sun City area's culture, encroachment on burrowing owl habitats, and the overall decline in quality of life for local residents. It is safe to say that no one would willingly choose to reside next to a warehouse. I am opposed to the construction of a warehouse in the proposed location and firmly believe that if the city of Menifee truly values its residents, it would recognize that the warehouse's proximity to residential areas and a retirement community is too close. The warehouse will not benefit the residents who will have to face the adversities that the warehouse will bring. I am certain that the establishment of this warehouse is not in the best interest of the surrounding neighborhoods. I am eager to receive more information on how to prevent the development of the proposed Northern Gateway Logistic center. Any guidance provided would be greatly appreciated. Thank you for taking the time to consider my concerns. 1 2

-Jose Marquez

Sent from my iPhone

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Response to Comment Letter P2 – Jose Marquez

P2-1 The Economic Development Corridor designation including the subarea Economic Development Corridor – Northern Gateway that the Project is located in was approved as part of the adopted Menifee GP. Pursuant to the Menifee Development Code, the Economic Development Corridor – Northern Gateway area is envisioned as a business park area with more intensive industrial uses (less office) and a buffer and transition between the commercial uses in Perris to the north and the residential uses in Menifee, south of McLaughlin Road. Therefore, the Project's proposed industrial uses are consistent with current land use and zoning designations. The Draft EIR prepared for this Project includes an analysis of the Project's impacts related to aesthetics, air quality, health risk assessment, biological resources, noise, and transportation. No significant unavoidable impacts were identified, but the City advises that the commenter read through the Draft EIR for further information.

P2-1 The Commenter's opposition to the Project has been noted for the record. Per the Commenter's request, the City will send the Commenter a public notice during distribution, prior to certification of this Final EIR.

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Section 3.0 Errata to the Draft EIR

3.1 INTRODUCTION TO THE ERRATA

The Draft EIR for the Northern Logistics Center Project dated May 2024, is hereby incorporated by reference as part of the Final EIR. Changes to the Draft EIR are further detailed below.

The changes to the Draft EIR do not affect the overall conclusions of the environmental document, and instead represent changes to the Draft EIR that provide clarification, amplification and/or insignificant modifications, as needed as a result of public comments on the Draft EIR, or due to additional information received during the public review period. These clarifications and corrections do not warrant Draft EIR recirculation pursuant to CEQA Guidelines Section 15088.5.

None of the changes or information provided in the comments reflect a new significant environmental impact, a substantial increase in the severity of an environmental impact for which mitigation is not proposed, or a new feasible alternative or mitigation measure that would clearly lessen significant environmental impacts but is not adopted. In addition, the changes do not reflect a fundamentally flawed or conclusory Draft EIR.

Changes to the Draft EIR are listed by Section, page, paragraph, etc. to best guide the reader to the revision. Changes are identified as follows:

- Deletions are indicated by ~~strikeout text.~~
- Additions are indicated by <u>underlined text.</u>

3.2 CHANGES TO THE DRAFT EIR

Page 2-3, 2nd Paragraph, 5th Sentence

Associated facilities and improvements of the Project site includes loading dock doors (15 for Building 1; 37 for Building 2), on site landscaping, and related on-site utility <u>improvements</u>~~ and off-site improvements~~, including <u>the</u> relocation of an underground flood channel <u>approximately 200 feet northerly along the same alignment to avoid conflicts with the proposed utility improvement; refer to **Section 4.9, Hydrology and Water Quality**</u>.

Page 2-4, 1st Full Paragraph, Seventh Paragraph

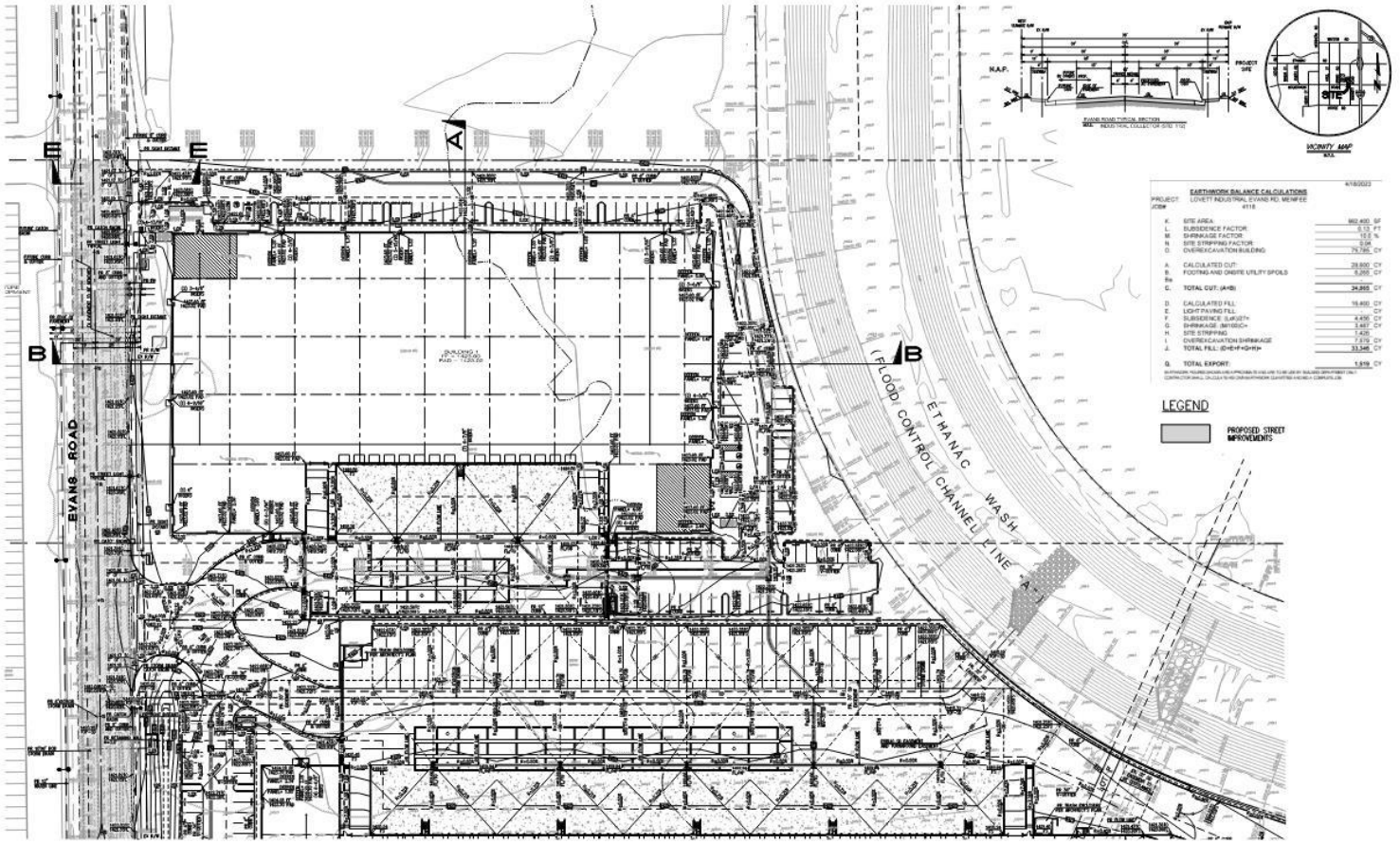
~~The proposed buildings would not include cold storage.~~

Page 2-4, Earthwork, Prior to 1st Sentence

<u>The Project is expected to use tractors, graders, dozers, and scrapers during the grading construction phase; refer to **Exhibit 2-11, Conceptual Grading Plan – Building 1**, **Exhibit 2-12, Conceptual Grading Plan – Building 2 Part 1**, and **Exhibit 2-13, Conceptual Grading Plan – Building 2 Part 2**. As shown in **Exhibits 2-11 through 2-13**, ~~T~~t</u>he Project would require approximately 34,865 Cubic Yards (CYs) of soil cut and 33,346 CYs soil fill resulting in approximately 1,519 CYs of export to balance the site.

New Pages 2-15 through 2-17

- Exhibit 2-11, Conceptual Grading Plan – Building 1
- Exhibit 2-12, Conceptual Grading Plan – Building 2 Part 1
- Exhibit 2-13, Conceptual Grading Plan – Building 2 Part 2



Source: Thienes Engineering, Inc. (2024). Conceptual Grading Plan Building 1

Exhibit 2-11: Conceptual Grading Plan - Building 1
City of Menifee
Northern Gateway Logistics Center

Not to Scale

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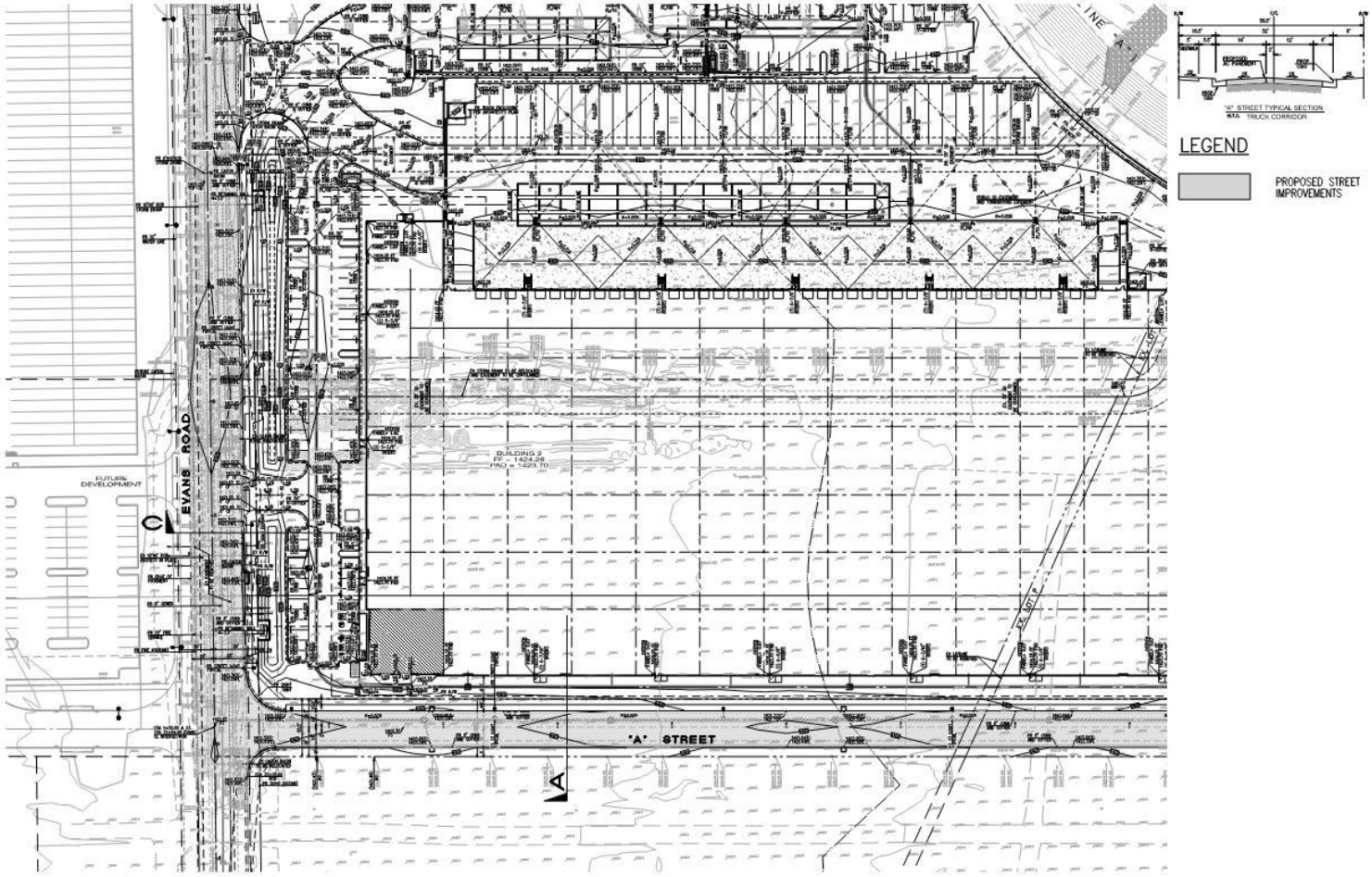

Source: Thienes Engineering, Inc. (2024). Conceptual Grading Plan Building 2

Exhibit 2-12: Conceptual Grading Plan - Building 2 Part 1
City of Menifee
Northern Gateway Logistics Center

Not to Scale

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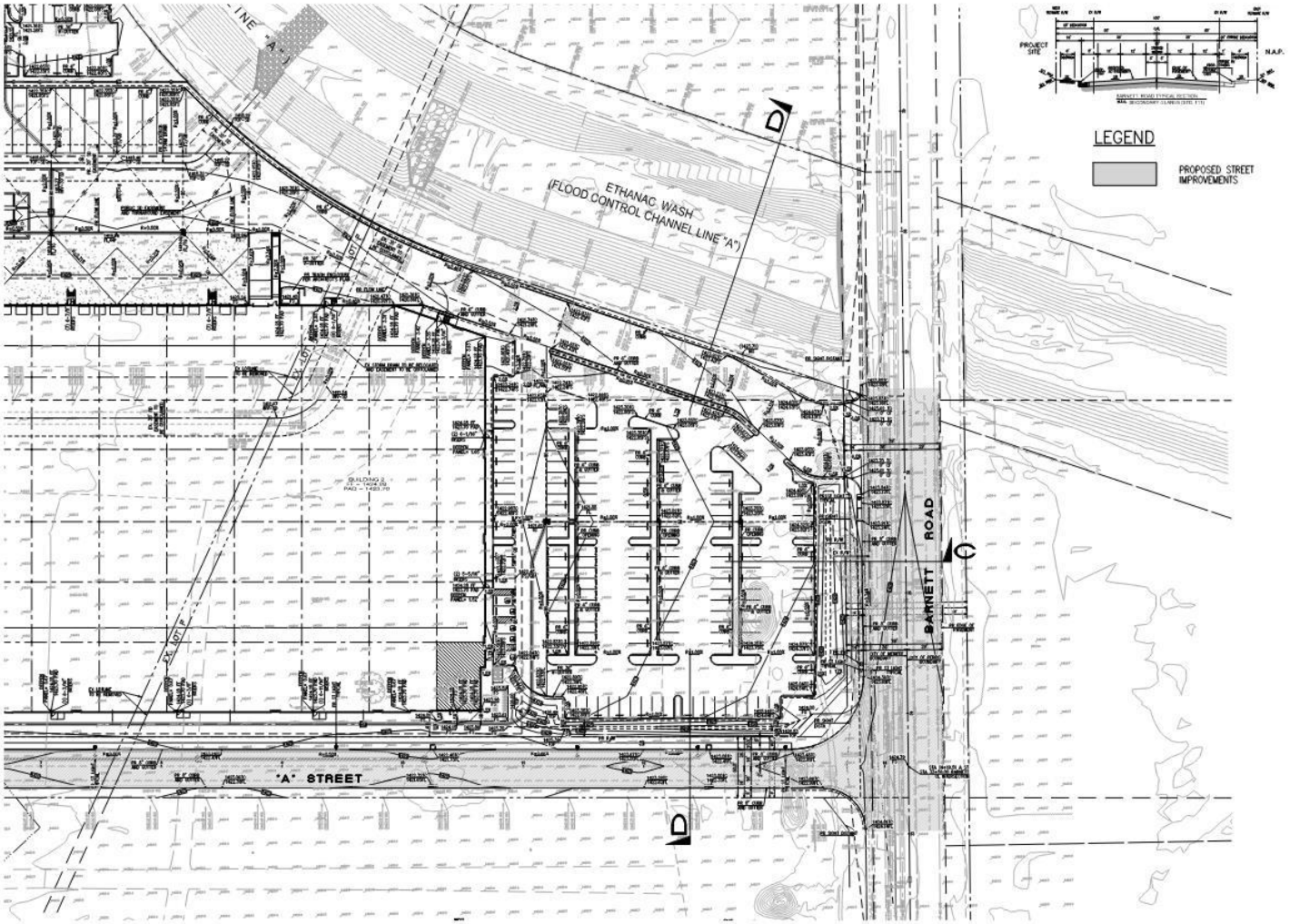

Source: Thienes Engineering, Inc. (2024). Conceptual Grading Plan Building 2

Exhibit 2-11: Conceptual Grading Plan - Building 2 Part 2
City of Menifee
Northern Gateway Logistics Center

Not to Scale

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Page 2-4, Off-Site Improvements, 3rd Bullet Point

- Storm System: 18" and 24" Reinforced Concrete Pipes (RCP) storm system in ~~A Street~~the future driveway. Installation of 7' catch basin and five manholes in ~~A Street~~the future driveway.

Page 2-12, Exhibit 2-7: Conceptual Site Plan - Building 2

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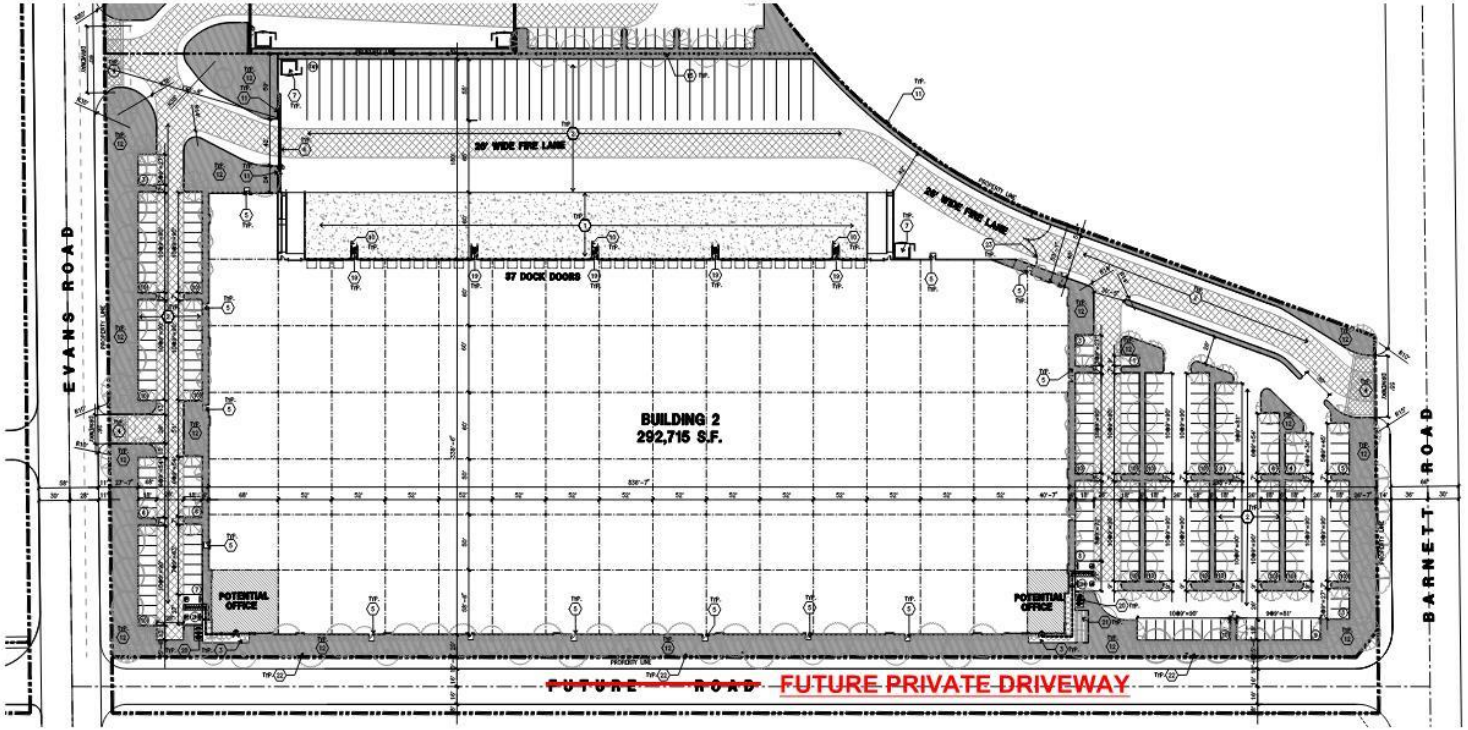

Source: HPA. (2023). Overall Site Plan

Exhibit 2-7: Conceptual Site Plan - Building 2
City of Menifee
Northern Gateway Logistics Center

Not to Scale

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Page 4.2-19, 1st Full Paragraph, Third Sentence

~~It should be noted that the Project does not include cold storage.~~

Page 4.4-7, 1st Paragraph, 3rd Sentence

The City conducted tribal consultation in compliance with Assembly Bill (AB) 52 and has received responses from the Rincon Band of Luiseño Indians and ~~Pachanga~~Pechanga Band of Indians.

Page 4.8-27, 1st Paragraph, 6th Sentence

The entirety of Project site is located within Compatibility Zone E of the ~~March Air Reserve Base[47]~~ MARB airport land use compatibility plan (ALUCP), but a small portion of the northwestern Project site is also located within Compatibility Zone E of the Perris Valley Airport ALUCP.[47] Please note that the portion of the Project site within Perris Valley Airport ALUCP encompasses the proposed northwest driveway only.

Page 4.8-27, 3rd Paragraph, 6th Sentence

~~All new development would be in accordance with the Compatibility Zone E and all state, county, and local goals, policies, and regulations. Furthermore, the Project does not require review by ALUC because the City is consistent with~~Since the Project is within compatibility zones E of the Perris Valley and MARB ~~airport land use compatibility plan (~~ALUCP~~s~~), but does not propose any legislative action (e.g., general plan amendment or zone change), review by RCALUC is not required and can be conducted by the City. As discussed throughout this EIR, the Project would be developed in accordance with all state, regional, and local regulations and design standards to minimize noise impacts during the Project's construction and operational phases; refer to **Section 4.11: Noise** for further information. Additionally, the Project would ~~To~~ be consistent with the requirements of Zone E~~,~~ by complying with COA HAZ-1~~ has been included,~~. ~~and t~~Therefore, the Project's potential to result in a safety hazard or excessive noise for people residing or working in the Project area would be less than significant.~~Project would not result in a significant impact.~~

Page 4.9-3, New Paragraph after 3rd Paragraph

MDP facility Line A-8 (Line A-8) traverses northly through the easterly through the northerly portion of the proposed Building 2 location, ultimately connecting to Line A. As concluded in the Preliminary Hydrology Calculations, the MDP 100-year flow rate in Line A-8 on the MDP map 292 cfs, although the storm drain plan shows 283 cfs.

Page 4.9-17, 2nd Paragraph, New Three Sentences

To collect surface water and runoff from the impervious areas, an extensive drainage plan would be in place which includes ribbon gutters, subsurface storm drains, curb cuts, u-channels, and detention basins. The basins are designed to weaken the flow of post-development runoff to pre-development conditions, and have been designed to treat runoff for pollutants, pursuant to SWRCB regulations. Additionally, the existing Line A-8 would be removed and relocated approximately 200 feet northerly along the same alignment to avoid conflicts the proposed drainage improvements. The relocated storm drain would maintain the same size (10 feet-width by 6 feet-height) and downstream hydraulic controls as the existing drain. The relocated Line A-8 would continue to discharge into Romoland MDP Line A. Refer to

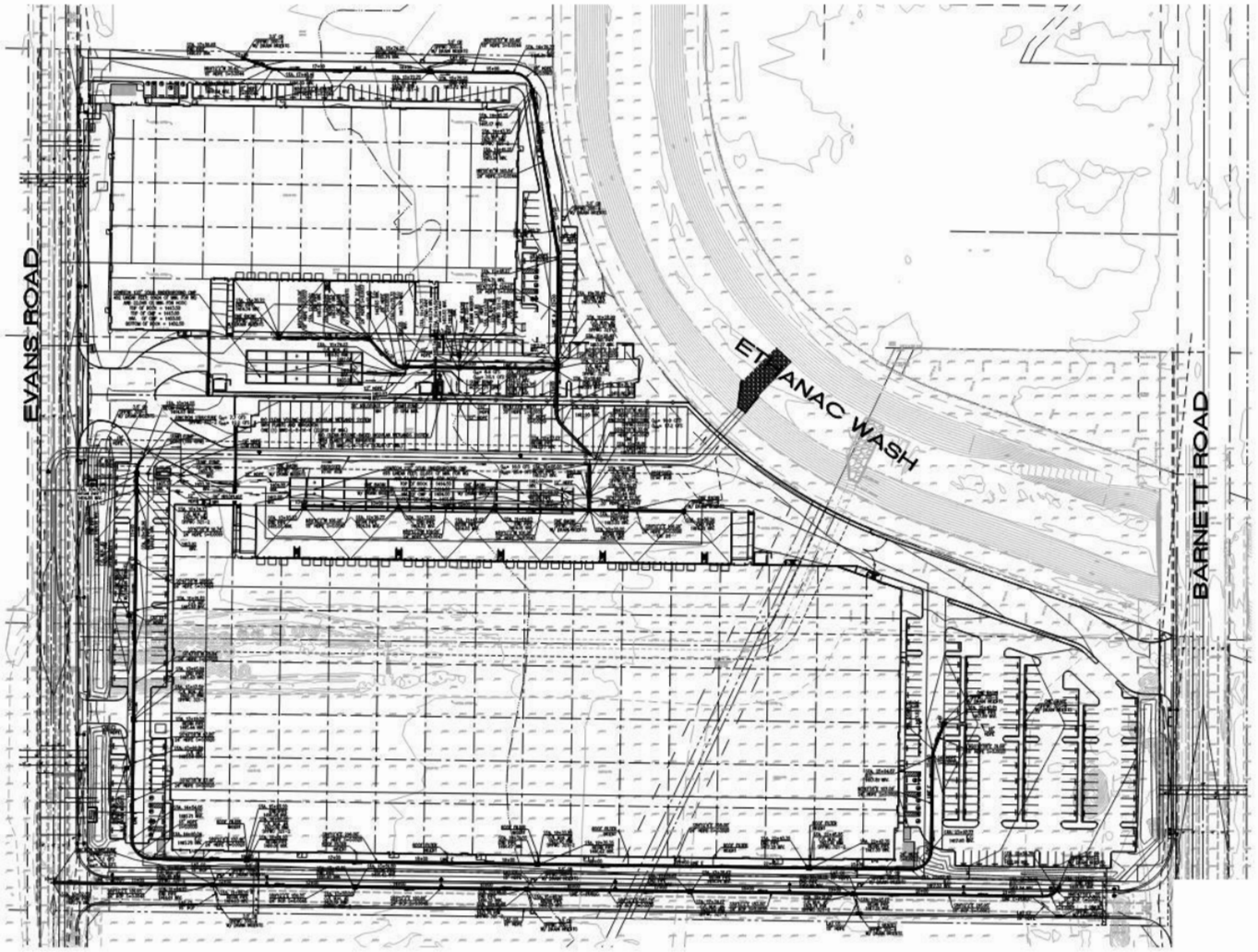
Exhibit 4.9-2: Conceptual Storm Drain Plan for that illustrates the Project's proposed drainage improvements and relocated Line A-8.

Page 4.9-17, New Page, Exhibit 4.9-2, Conceptual Storm Drain Plan

Page 4.15-13, 3rd Paragraph, New Sentence

As shown in **Exhibit 4.15-1, Conceptual Utility Plan**, ~~E~~existing utilities would be extended and upgraded as needed during construction of Project to serve the anticipated demands and to accommodate operation of the warehouses. All required improvements and extensions to existing electrical, natural gas, or telecommunications utilities would occur within the existing roadway rights-of-way adjacent to the Project site, and off-site at ~~including~~ Evans Road, Barnett Road~~s~~, and McLaughlin Road. All areas adjacent to the existing roadways are also disturbed and are within the overall footprint of the Project. All impacts are discussed and disclosed as part of this Draft EIR, within the various sections of this document.

Page 4.9-15, New Page, Exhibit 4.15-1, Conceptual Utility Plan



Source: Thienes Engineering, Inc. (2024). Conceptual Storm Drain Plan

Exhibit 4.9-2: Conceptual Storm Drain Plan
City of Menifee
Northern Gateway Logistics Center

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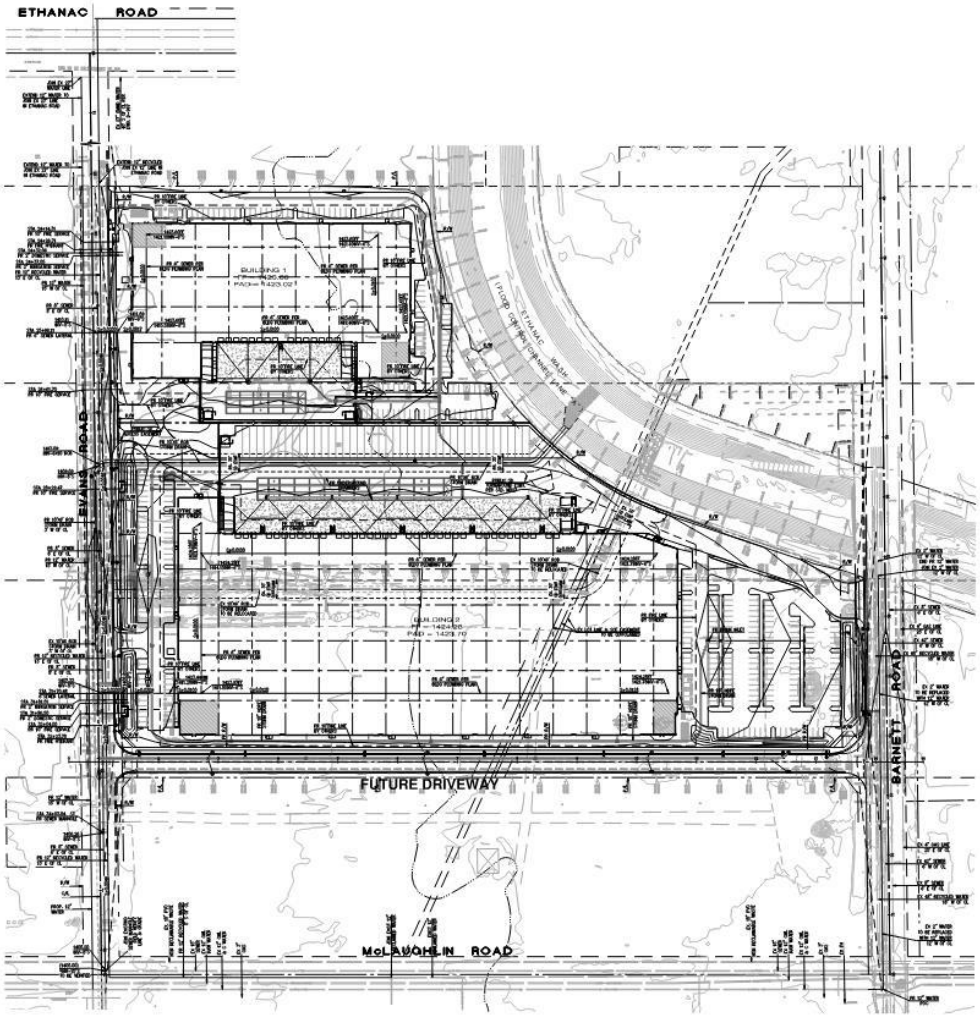

Source: Thienes Engineering, Inc. (2024). Conceptual Utility Plan

Exhibit 4.15-1: Conceptual Utility Plan
City of Menifee
Northern Gateway Logistics Center

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Page 5-5, 2nd Sentence, Updated Discussion

Refer to **Sections 4.1** through **4.15** of this EIR. ~~As discussed above, the Project~~No project-specific or cumulatively significant impacts were discovered during the analysis of the Project. Mitigation measures would be implemented to ensure that all environmental impacts are reduced to less than significant levels. As such, the Project would not result in activities that could significantly affect the environment, either individually or cumulatively.

Page 7-4, 1st and 2nd Paragraph, New Paragraph

Construction of the Project would generate temporary employment opportunities, including short-term design, engineering, and construction jobs. Construction related jobs would not result in a significant population increase because those jobs are temporary in nature and are expected to be filled by persons within the local area. This expectation is based on the latest unemployment data for Riverside County [6] (4.5 percent) and the City of Menifee[7] (4.2 percent). Utilizing SCAGs Employment Density Study of 1 employee per square feet per employee (581 for warehousing; 481 for Office) in Riverside County, the Project could potentially create approximately 692 permanent job opportunities once the Project is developed. This would represent 4.5 percent of employment growth. However, employment growth does not directly translate into population growth.

Data from the Joint Center for Housing Studies of Harvard University found that approximately 13 percent of Americans move each year, and of those 21 percent move for job-related reasons. 13 percent of 692 is 90 people and 21 percent of 90 people is 19 people. Therefore, the Project could potentially generate approximately 19 new residents in the City Menifee which represents approximately 0.07 percent and 0.003 percent of the City's and County's population growth forecast of 129,800 people, and 2,927,000 people, respectfully, by 2045.[8]~~Additionally, the~~The ~~SCAG's Connect SoCal notes that it is anticipated that the population would in Riverside County would grow to 2,927,000.[8] Similarly, the Menifee GP Draft EIR states that the population is forecast to grow to 119,332 by 2035[9].~~

As such, population growth in the City is anticipated with future development and such growth has been considered in the City's General Plan. Furthermore, the Project site is served by existing public roadways, and utility infrastructure would be installed beneath the public rights-of-way that abut the Project site. For these reasons, ~~Project construction~~development of the Project would not directly or indirectly induce substantial, unplanned population growth in the City. Therefore, the Project is anticipated to have a less than significant impact on unplanned population growth.