

Date: December 2, 2024
Prepared by: Meaghan Truman, Associate Environmental Planner III
To: Monique Alaniz-Flejter, Mflejter@hemetca.gov
Site: Newland Simpson Road Project
Subject: Responses to Golden State Environmental Justice Alliance (GSEJA)

This memo contains responses to comments related to the Environmental Impact Report (EIR) that the City of Hemet received on November 30, 2024, prior to the City’s Planning Commission meeting on December 3, 2024 for which the Project is on the agenda. It should be noted that these comments have been previously submitted in a comment letter to the Draft EIR, and responded to in the Final EIR, as detailed below.

As further detailed in the individual responses to comments below, none of the comments indicate that there would be a substantial increase in the severity of a previously identified environmental impact that would not be mitigated, or that there would be any of the other circumstances requiring recirculation as described in CEQA Guidelines Section 15088.5. No new significant environmental impact would result from the Project or from a new mitigation measure proposed to be implemented, there is no substantial increase in the severity of an environmental impact, no feasible project alternative or mitigation measure considerably different from others previously analyzed would lessen the environmental impacts of the proposed Project, and the EIR is not fundamentally inadequate and conclusory in nature.

Letter L1: Golden State Environmental Justice Alliance (GSEJA) (3 pages) Late Comment letter



To: Hemet Planning Commission

From: Golden State Environmental Justice Alliance

Subject: Newland Simpson Project EIR

This letter is to serve as further comment in addition to all previously submitted comments and documents by Golden State Environmental Justice Alliance along with further analysis by SWAPE in a separate attachment.

CalEnviroScreen Information

CalEnviroScreen is a mapping tool that helps identify California communities that are most affected by many sources of pollution, and where people are often especially vulnerable to pollution's effects. CalEnviroScreen uses environmental, health, and socioeconomic information to produce scores for every census tract in the state. The scores are mapped so that different communities can be compared. An area with a high score is one that experiences a much higher pollution burden than areas with low scores. CalEnviroScreen ranks communities based on data that are available from state and federal government sources. CalEnviroScreen is updated and maintained by The Office of Environmental Health Hazard Assessment, on behalf of the California Environmental Protection Agency.

L1.1

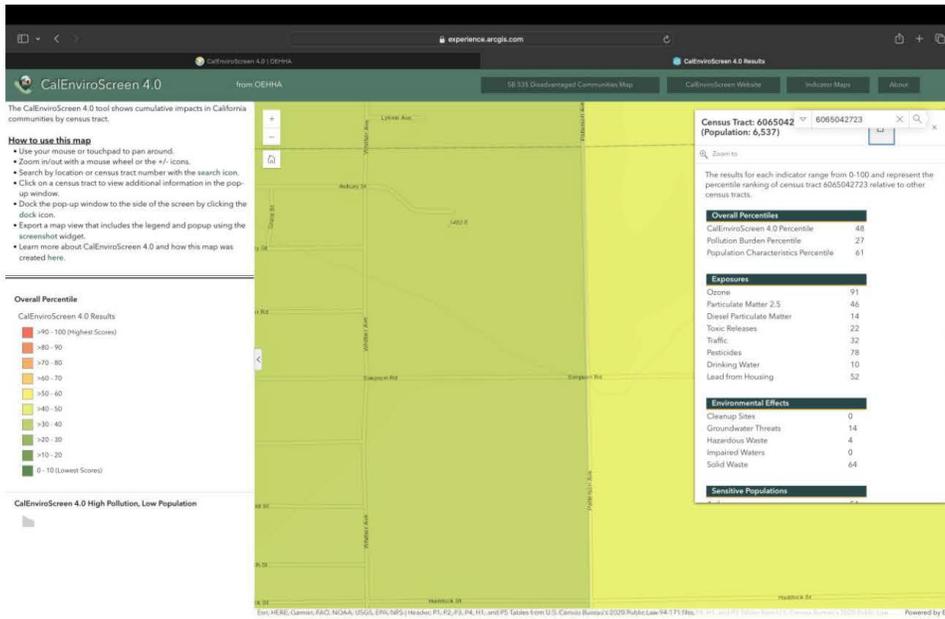
CalEnviroScreen Data on : Newland Simpson EIR Project Location/Area

The above listed project is in census tract (6065042723). Overall, when compared to other census tracts, the project site census tract is in the 69th percentile regarding pollution. As far as pollution burden is concerned, this census tract is in the 57th percentile. In terms of Ozone, this census tract is in the 98th percentile, and Traffic 82nd percentile, to name a few.

**Tracy Costco Depot Annex
Census Tract: 6065042723**

Population: 6,537

Environmental Effects	%
Solid Waste	64%
Sensitive Populations	%
Cardiovascular Disease	70%
Asthma	54%
Exposures	%
Ozone	91%
Pesticides	78%
Socioeconomic Factors	%
Unemployment	39%
Overall Percentiles	%
Population Characteristics Percentile	61%
CalEnviroScreen 4.0 Percentile	48%



**L1.1
Cont.**

Conclusion

Consider the above referenced information when making this important decision. Realize that you and the citizens of this area face some of the WORST POLLUTION in the entire state of California.

It is the responsibility of the City's elected and appointed officials to make environmentally responsible development decisions. Based on the CalEnviroScreen data, this is more than sufficient evidence of the further air quality impacts that the citizenry of Hemet will continue to encounter with further development of another warehouse. We are not against development, as we believe it is necessary for further economic growth in our current society. Development needs to be conducted with the highest of expectations to ensure the local population does not suffer further air quality burdens.

L1.2

We stand by our comments and believe the EIR is flawed and should be redrafted and recirculated for public review.

Respectfully Submitted,

Steven Piepkorn

Steven Piepkorn
GSEJA

Source -

https://experience.arcgis.com/experience/4af93cf9888a424481d2868391af2d82/page/home/?data_id=dataSource_2-1754d6afdb4-layer-9%3A7306

Glossary of Terms

Ozone - Amount of daily maximum 8-hour Ozone concentration

Particulate Matter 2.5 - Annual mean PM 2.5 concentrations

Diesel Particulate Matter - Diesel PM emissions from on-road and non-road sources

Toxic Releases - Toxicity-weighted concentrations of modeled chemical releases to air from facility emissions and off-site incineration.

Traffic -Traffic density, in vehicle-kilometers per hour per road length, within 150 meters of the census tract boundary.

Response to Letter L1: Golden State Environmental Justice Alliance (GSEJA), dated November 30, 2024

This comment letter was received after the public review and comment period ended (May 17, 2024, through July 1, 2024). As stated in Section 15088 of the CEQA Guidelines, Lead Agencies are not required to respond to letters received outside of the noticed comment period. However, the following responses have been prepared to provide clarity regarding the environmental concerns that have been raised.

Comment L1.1: This comment states that the letter is to serve as a further comment in addition to previous comments submitted by GSEJA. The comment states that the CalEnviroScreen Information is a mapping tool that identifies pollution burden of census tracts. The comment states that the Project site census tract is in the 69th percentile regarding pollution. As far as pollution burden is concerned, this census tract is in the 57th percentile. In terms of ozone, this census tract is in the 98th percentile, and traffic is in the 82nd percentile.

Response L1.1: The comment provides information about the existing setting of the census tract and does not raise a specific issue with the adequacy of the EIR or raise any other CEQA issue. This comment was raised as Comment O3.7 in the Final EIR and responded to as Response O3.7 (on pages 2-215 through 2-217) of the Final EIR. As detailed in these Final EIR responses to comments, the existing pollution burden of the Project vicinity is described in Draft EIR Section 5.3, *Air Quality*. Table 5.3-2 provides data from the closest air quality monitoring station to the Project site (SRA 24 Perris Valley, SRA 25 Elsinore Valley, and SRA 23 Metropolitan Riverside County). Data from the air quality monitoring stations indicates that the PM_{2.5} federal standard had 5 exceedances in 2020, 13 exceedances in 2021, and 0 exceedances in 2022. While the Project vicinity has experienced exceedances of State and federal standards, the thresholds set forth by the SCAQMD are intended to be health protective and are based on Clean Air Act standards and recommendations by the EPA. Although there has been an increase in development in the South Coast Area Basin, emissions concentrations have declined, and air quality has generally improved over the last 30 years largely due to cleaner air vehicles and fuel requirements.

CalEnviroScreen is a general policy tool and it is generally inappropriate for CEQA review. In addition, the photo provided in the comment letter does not show the Project site but shows the screening levels for the "Tracy Costco Depot Annex", which is located approximately 2.25 miles west of the Project site in the unincorporated community of Winchester. The comment incorrectly asserts that the census tract is in the 69th percentile regarding pollution and 57th percentile for pollution burden. The image of the CalEnviroScreen Map provided in the comment letter shows that the area is actually within the 48th percentile for pollution and 27th percentile for pollution burden, which is far below what the commenter assumed. In addition, the census tract is actually in the 91st percentile for ozone and the 32nd percentile for traffic, compared to the 98th and 82nd percentile as listed by the commenter. Thus, the data provided in the comment letter is not accurate for the Project site. The EIR provides a detailed evaluation of the potential cumulative air quality related impacts of the proposed Project upon the surrounding community (localized impacts) pursuant to SCAQMD methodology and thresholds, which is the appropriate due to the Project's location within the South Coast Air Basin.

As detailed under Impact AQ-2 in Section 5.3, *Air Quality*, of the Draft EIR, pollutant emissions associated with operation of the Project would be below SCAQMD thresholds and the Project would not result in a net increase of a pollutant for which the region is in non-attainment. Construction of the proposed Project would generate regional emissions that would exceed the applicable SCAQMD threshold for VOCs and NO_x. The Project would implement Mitigation Measures AQ-1 and AQ-2 to reduce the construction NO_x and VOCs emissions. These measures would be sufficient enough to reduce the NO_x and VOCs emissions to below the SCAQMD thresholds. Therefore, criteria emissions impacts related to construction and operation of the proposed Project would be less than significant with the implementation of Mitigation Measures AQ-1 and AQ-2.

Also, a Mobile Source Construction Health Risk Assessment (included as Appendix D to the Draft EIR) was prepared to evaluate the health risk impacts as a result of exposure to diesel particulate matter (DPM) as a result of heavy-duty diesel trucks and equipment activities from Project construction. The results of the health risk assessment determined that at the maximum incremental cancer risk attributable to construction DPM source emissions from the proposed Project is 0.55 in one million, which would not exceed the SCAQMD cancer risk threshold of 10 in one million. As such, the Project would not cause a significant human health or cancer risk to adjacent land uses as a result of Project construction activity.

An Operational Diesel Mobile Source Health Risk Assessment (included as Appendix D to the Draft EIR) was also prepared to evaluate the operational health risk impacts as a result of exposure to DPM from heavy-duty diesel trucks traveling to and from the Project site, maneuvering onsite, and entering and leaving the site during operation of the Project. The Draft EIR details that the results of the operational health risk assessment identified that the maximum cancer risk would be 1.47 in one million for the nearby residential land uses, which is below the SCAQMD threshold of 10 in one million. The worker receptor risk would be lower at 0.09 in one million. Maximum non-cancer risks at this same location were estimated to be less than 0.01, which would not exceed the applicable significance threshold of 1.0. In addition, the Draft EIR determined that the maximum incremental cancer risk impact attributable to the Project for both construction and operation is calculated to be 1.29, below the threshold of 10. Therefore, all health risk levels to nearby residents from construction and operation-related emissions of TACs would be well below the SCAQMD's HRA thresholds and impacts would be less than significant.

The Draft EIR also included a long-term microscale (CO Hot Spot) analysis on page 5.3-28 which determined Project-related vehicles are not expected to contribute significantly to result in the CO concentrations exceeding the State or federal CO standards. Therefore, as concluded in the Draft EIR, the Project would not impact nearby residences or schools.

Comment L1.2: This comment states that the air quality of the area should be considered, and that the City should make environmentally responsible decisions based on the CalEnviroScreen data. The comment asserts that this is sufficient evidence of the further air quality impacts from development of another warehouse. The comment states that development is necessary for further economic growth in our current society, but that the local population should not suffer further air quality burdens. The comment states that the EIR is flawed and should be redrafted and recirculated for public review.

Response L1.2: The comment does not provide any specific issue related to the analysis or findings within the EIR or provide any substantial evidence of a new or increased environmental impact not addressed in the EIR. The comment does not detail the type of additional environmental analysis that assertedly should be included. CalEnviroScreen is a general policy tool. It is generally inappropriate for CEQA review. As detailed in the previous response, the EIR provides a detailed evaluation of the potential cumulative air quality related impacts of the proposed Project upon the surrounding community pursuant to SCAQMD methodology and thresholds, which is appropriate due to the Project's location within the South Coast Air Basin.

The comment does not identify any of the conditions that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5. No new significant environmental impact would result from the Project or from a new mitigation measure proposed to be implemented, there is no substantial increase in the severity of an environmental impact, no feasible Project alternative or mitigation measure considerably different from others previously analyzed would lessen the environmental impacts of the proposed Project, and the EIR is not fundamentally inadequate and conclusory in nature.