

September 14, 2026

Brandi Jones
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Sent via email

Dear Brandi Jones:

Thank you for providing the California Air Resources Board (CARB) with the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Irwindale Brew Yard Specific Plan (Project), State Clearinghouse No. 2024020415. The Project is located in the City of Irwindale (City), which serves as the lead agency for California Environmental Quality Act (CEQA) purposes.

The Project proposes the development of 3.12 million square feet of new industrial, commercial, and business park uses on approximately 150 acres of land. The proposed development would be built in two phases. The first phase (Phase 1) would consist of approximately 3 million square feet of uses, including light industrial, e-commerce and logistics distribution, warehousing, cold storage, light manufacturing, and research and development. The second phase (Phase 2) would consist of approximately 12,000 square feet of office park, industrial, and other retail uses.¹ According to the DEIR, Project operations are expected to generate 13,219 daily vehicle trip ends, including 1,070 heavy-duty truck trip ends per day.²

To limit the Project's impact on public health, the City should strive to make the Project as clean as possible. The following sections set forth CARB's comments on specific aspects of the DEIR. In summary, CARB urges the City to take the following actions: (1) provide substantial evidence supporting the assumed 20-mile heavy-duty truck hauling distance during onsite construction, (2) include a mitigation measure requiring all heavy-duty trucks

¹ City of Irwindale. Irwindale Brew Yard Specific Plan. August 2026. Page ES-5. Accessible at <https://files.ceqanet.lci.ca.gov/295736-2/attachment/Ri1CKPIJAbCx7Ft5hLWOXBpUBkvDBPK4dqztS-iMxsKL9OKA5ITxPJISBILKtNasG5KxS4fF7EI7irJN0>

² City of Irwindale. Irwindale Brew Yard Specific Plan. Appendix P1. Page 16. Table 2-2. Accessible at https://files.ceqanet.lci.ca.gov/295736-2/attachment/655uAtlx0wi48F3hsKOZmMemAMj51_TjVVoNi3bgXBv4cHKcfMZoGZOrs3kuXJEDBf9TxXXD_hSqiq1-0

and transport refrigeration units (TRU) serving the Project to be electric, and (3) participate in CARB's California Clean Construction Program (CCC).

The Project Would Significantly Contribute to Existing Pollution Burdens

CARB is concerned that the Project would introduce a new 3-million-square-foot industrial pollution source in close proximity to residences and schools. Construction and operation of the Project would generate toxic diesel particulate matter (diesel PM) emissions that could adversely affect public health, particularly for nearby sensitive receptors. The nearest sensitive receptors include residences located approximately 2,394 feet from the Project's northern boundary, as well as Paramount Elementary School, Valleydale Elementary School, and Gladstone Middle School, all located within two miles of the Project's eastern boundary. These residences and schools are already disproportionately burdened by existing sources of air pollution. Accordingly, emissions from construction and operation of the Project would add to existing pollution burdens and could exacerbate public health risks for nearby residents and students.

The existing environmental and health burdens in the surrounding community underscore the importance of avoiding additional pollution. The census tracts surrounding the Project site rank within the top 25% of census tracts statewide under CalEnviroScreen 5.0 and are therefore designated as disadvantaged communities.^{3,4} The Pollution Burden component of the CalEnviroScreen 5.0 scores for these census tracts reaches the 91st percentile statewide, placing these communities within the top 8% of census tracts in California for pollution burden. CalEnviroScreen 5.0 also identifies elevated rates of cardiovascular disease, asthma, and low birth weight among the health characteristics of communities near the Project site.

The Project's potential impacts must also be considered in the context of other industrial developments occurring in the surrounding area. Chapter 3 (Environmental Analysis) of the DEIR identifies approximately 25 industrial development projects at various stages of the approval process within two miles of the proposed Project site. As shown in Table 3-2, Cumulative Projects within Two Miles of the Proposed Project Site, six of these 25 cumulative projects consist of industrial and warehousing developments totaling more than 800,000 square feet of additional industrial development.⁵ When considered together with the proposed 3-million-square-foot Project, these developments represent a substantial

³ OEHHA. CalEnviroScreen 5.0. Accessible at <https://experience.arcgis.com/experience/be03d78c74454429ab1d3fd9266d4400>

⁴ OEHHA. SB535 Disadvantaged Communities. Accessible at <https://oehha.ca.gov/calenviroscreen/sb535>

⁵ City of Irwindale. Irwindale Brew Yard Specific Plan. August 2026. Page 3-14. Table 3-2. Accessible at <https://files.ceqanet.lci.ca.gov/295736-2/attachment/Ri1CKPIJAbCx7Ft5hLWOXBpUBkvDBPK4dqztS-iMxsKL9OKA5ITxPJISBILKtNasG5KxS4fF7EI7irJN0>

increase in industrial activity and associated sources of air pollutant emissions in an area that is already experiencing significant pollution burdens.

Thus, the Project should not be evaluated in isolation. Its construction and operational emissions would be added to existing pollution burdens and the emissions associated with other current and reasonably foreseeable industrial developments in the area. The resulting cumulative increase in air pollutant emissions could further burden nearby disadvantaged communities and sensitive receptors, including residences and schools. Given these existing and cumulative conditions, the City should require all feasible mitigation measures identified in this letter to reduce the Project's contribution to cumulative air quality impacts and protect the health of nearby residents and students.

The DEIR May Have Underestimate Construction-Related Air Pollutant Emissions from Trucks

The Project may have underestimated its construction-related air quality impacts associated with heavy-duty truck activity. Chapter 2 (Project Description) of the DEIR states that the Project site contains two pits, the southeast pit and the northwest pit, that would require approximately 10 million cubic yards of fill material to complete the proposed pit-filling activities. Approximately 2 million cubic yards of material would be transferred from the northwest pit to the southeast pit, while approximately 8 million cubic yards of fill material would need to be imported from off-site locations throughout Los Angeles County to fill the northwest pit. Based on the proposed 15-cubic-yard truck capacity, the off-site import of fill material would require approximately 533,334 truckloads.⁶

The Project's construction air quality impact analysis was conducted using the California Emissions Estimator Model (CalEEMod). Based on CARB's review of the Project's CalEEMod input files, the City used CalEEMod's default 20-mile trip distance to estimate mobile-source emissions associated with the import of fill material to the Project site during the filling of the onsite pits. However, the DEIR states that fill material could be imported from locations throughout Los Angeles County. Therefore, it is possible that heavy-duty trucks transporting fill material could travel farther than 20 miles. Given the large volume of fill material that would be imported and the approximately 533,334 truckloads that would be required, even modest increases in the assumed travel distance could result in substantially greater construction-related emissions.

To fully evaluate the Project's construction air quality impacts, the City should use travel distances based on substantial evidence regarding the likely sources of imported fill material, rather than relying on CalEEMod's default 20-mile trip distance. The City should

⁶ City of Irwindale. Irwindale Brew Yard Specific Plan. August 2026. Page 2-72. Accessible at <https://files.ceqanet.lci.ca.gov/295736-2/attachment/Ri1CKPIJAbCx7Ft5hLWOXBpUBkvDBPK4dqztS-iMxsKL9OKA5ITxPJISBILKtNasG5KxS4fF7E17irJN0>

revise the construction emissions analysis accordingly and disclose the results in the Final Environmental Impact Report (FEIR).

The City Should Include More Meaningful Mitigation Measures

The City concluded in Chapter 3.2 (Air Quality) of the DEIR that the operation of the Project would result in a significant impact on air quality. According to Table 3.2-12 (Maximum Daily Regional Operation Emission), the operation of the Project would result in a net increase of 206 pounds per day of volatile organic gas (VOC), 241 pounds per day of oxides of nitrogen (NO_x), and 780 pounds per day of carbon monoxide (CO), which were found to exceed the Southern California Air Quality Management District's significance thresholds and would result in a significant impact on air quality.

To mitigate the Project's operational air quality impacts, the DEIR included 13 mitigation measures (MM AQ-1 through MM AQ-13). These mitigation measures include requiring the use of electric construction equipment where feasible, Tier 4 Final or equivalent off-road construction equipment, limits on equipment and truck idling, and restrictions on grading during days with poor air quality. The measures also require the use of low-VOC and Super-Compliant paints and coatings, provide for community outreach through a designated community liaison, and encourage construction worker use of transit and ridesharing. For Project operations, the mitigation measures require infrastructure to support future electric truck and vehicle charging, the use of cleaner truck and fleet technologies, compliance with CARB truck and bus regulations, and measures to reduce truck queuing, idling, and unnecessary vehicle activity. The measures also include energy-efficiency requirements, such as Energy Star equipment, additional electrical infrastructure, and building energy performance exceeding applicable Title 24 standards. After the implementation of these mitigation measures, the City concluded in the DEIR that the Project would result in a significant and unavoidable impact on air quality.

Although CARB applauds the City for including mitigation measures to support electric onsite equipment, and heavy-duty trucks during the Project's operation, more could be done to reduce the Project's significant impact on air quality.

According to Appendix D of the DEIR, approximately 535,000 square feet of the 3-million-square-foot development would be used for cold storage, which would result in approximately 401 daily TRU trips to the Project site.⁷ TRUs can emit significant amounts of toxic diesel PM while operating, particularly when idling. Residences and other sensitive receptors located near areas where these TRUs could be operating or idling could be exposed to diesel PM emissions, potentially increasing health risks for the surrounding community. To reduce diesel PM exposure and associated cancer risks during Project

⁷ City of Irwindale. Irwindale Brew Yard Specific Plan. August 2026. Appendix D. Page 1. Accessible at <https://ceqanet.lci.ca.gov/2024020415/2/Attachment/llytcU>

operation, CARB urges the City to include a mitigation measure in the FEIR requiring all TRUs accessing the Project site to be plug-in capable and requiring the installation of onsite charging infrastructure to support the use of electric-powered TRUs.

MM AQ-9, MM AQ-12, and MM AQ-13 require the use of 2014 or newer engines for heavy-duty trucks and require compliance with CARB's Truck and Bus Regulation, which specifies that heavy-duty trucks must have 2010 or newer engines. However, the City should not rely on compliance with existing CARB regulations as mitigation for the Project's operational truck air pollutant emissions. The regulation establishes minimum statewide requirements and does not eliminate the Project's diesel PM and NOx emissions or address the Project-specific health impacts associated with the large number of heavy-duty trucks that would serve the site. Given the scale of the Project and the potential for substantial truck activity, additional Project-specific measures are warranted to reduce diesel PM and NOx emissions.

To reduce the Project's operational NOx and diesel PM emissions, CARB urges the City to include the following measures, either as mitigation measures or enforceable project design features, in the FEIR:

- Include contractual language in tenant lease agreements requiring a transition of heavy-duty trucks entering or operating on the Project site, phased-in overtime toward 100% zero-emission trucks. Incentive funds may be available through programs such as the Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project (HVIP) and the Carl Moyer Program and Voucher Incentive Program.^{8,9}
- Include contractual language in tenant lease agreements requiring future tenants to exclusively use zero-emission light- and medium-duty delivery trucks and vans.

CARB Urges the City to Participate in CARB's California Clean Construction Program

The DEIR concludes that even after implementation of MM AQ-1 through MM AQ-5, which require the use of Tier 4 Final construction equipment, the Project's construction air pollutant emissions of NOx would remain above the SCAQMD's significance threshold emissions. Consequently, the construction of the Project would temporarily expose these adjacent residences and schools to harmful air pollution and would contribute to the existing air pollution burden in the surrounding community. To reduce these impacts, CARB urges the City to include a project design feature or mitigation measure in the FEIR requiring participation in CARB's CCC program for the Project.

⁸ Zero-Emission Truck and Bus Voucher Incentive Project. Accessible at: <https://californiahvip.org/>

⁹ Carl Moyer Program and Voucher Incentive Program. Accessible at: <https://ww2.arb.ca.gov/carl-moyer-program-apply>

The CCC program is a voluntary initiative administered by CARB to accelerate the deployment of zero-emission and advanced clean off-road construction equipment across California. The program was developed as part of CARB's broader strategy to meet State Implementation Plan commitments and improve air quality in communities disproportionately burdened by diesel pollution, such as the community surrounding the Project. The program serves as a voluntary framework that recognizes and encourages fleets to go beyond existing regulations, such as CARB's In-Use Off-Road Diesel-Fueled Fleets Regulation. The program prioritizes the use of battery-electric, hydrogen fuel cell, and other zero-emission construction equipment where those technologies are commercially available, and where not, encourages the use of the cleanest available diesel equipment. CARB maintains a Zero-Emission Equipment List identifying eligible equipment models and provides guidance to awarding bodies on how to integrate clean construction criteria into bid specifications and contract documents.¹⁰

The construction of the Project will likely use many of the off-road equipment types identified on the Zero-Emission Equipment List. As presented in Appendix D of the DEIR, the City assumed in its construction emissions modeling that the Project would require the use of forklifts, rough terrain forklifts, excavators, rubber-tired dozers, graders, cranes, pavers, generators, tractors/loaders/backhoes, and other equipment, several types of which are available as zero-emission on the Zero-Emission Equipment List. CARB notes that the Project already commits to Tier 4 off-road equipment; the CCC program represents the next step beyond that commitment toward zero-emission construction.

In addition to participating in the CCC program, CARB urges the City to include the following recommended emission reduction strategies as enforceable project design features or mitigation measures in the FEIR:

- Ensure the cleanest possible construction practices and equipment are used. This includes eliminating the idling of diesel-powered equipment and providing the necessary infrastructure (e.g., electrical hookups) to support zero and near-zero equipment and tools.
- In construction contracts, require all off-road diesel-powered equipment used during construction to be equipped with Tier 4 Final engines with a diesel particulate filter or cleaner engines, except for specialized construction equipment for which such engines are not available. Information on finding Tier 4 final equipment with diesel particulate filter is available on CARB's website.¹¹

¹⁰ California Clean Construction Program. Accessible at: [California Clean Construction Zero-Emission Equipment List | California Air Resources Board](#).

¹¹ Optional Tier 4 Final + Diesel Particulate Filter Equipment. Accessible at [Optional Tier 4 Final + Diesel Particulate Filter Equipment | California Air Resources Board](#).

- In construction contracts, require that all off-road equipment with a power rating below 19 kilowatts (e.g., plate compactors, pressure washers) used during construction be battery powered.
- In construction contracts, require all heavy-duty trucks entering the construction site during the grading and building construction phases to be zero-emission where feasible; if zero-emission trucks are not feasible, trucks must be model year 2017 or later. All heavy-duty haul trucks should also meet CARB's lowest optional low-NOx standard.¹²

Conclusion

CARB recognizes the City and Project applicant for incorporating mitigation measures that support zero-emission technologies, including charging infrastructure supporting electric trucks. However, CARB remains concerned that the DEIR does not adequately address the Project's air quality and public health impacts. The FEIR must provide substantial evidence supporting the 20-mile haul truck trip distance and prioritize enforceable onsite measures that provide direct emission reductions at Project startup, including requirements to phase in zero-emission heavy-duty trucks and TRUs.

CARB appreciates the opportunity to comment on the DEIR for the Project. Given the breadth and scope of projects subject to CEQA review throughout California that have air quality impacts, coupled with CARB's limited staff resources to substantively respond to all issues associated with a project, CARB must prioritize its substantive comments here based on staff time, resources, and its assessment of impacts. CARB's deliberate decision to comment on some issues does not constitute an admission or concession that it substantively agrees with the lead agency's findings and conclusions on any issues on which CARB does not submit comments.

¹² In 2013, CARB adopted optional low-NOx emission standards for on-road heavy-duty engines. CARB encourages engine manufacturers to introduce new technologies to reduce NOx emissions below the current mandatory on-road heavy-duty diesel engine emission standards for model-year 2010 and later. CARB's optional low-NOx emission standard is available at: <https://ww2.arb.ca.gov/our-work/programs/optional-reduced-nox-standards>

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CARB staff can provide assistance with zero-emission technologies and emission reduction strategies, as needed. Please include CARB on your list of selected State agencies that will receive the FEIR. If you have questions, please contact Stanley Armstrong, Air Pollution Specialist via email at stanley.armstrong@arb.ca.gov.

Sincerely,

A handwritten signature in blue ink, reading "Matthew O'Donnell". The signature is fluid and cursive, with the first name "Matthew" and last name "O'Donnell" clearly distinguishable.

Matthew O'Donnell, Chief, Risk Reduction Branch

cc: California State Clearinghouse
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