



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

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Ms. Dianne Sbardellati, Associate Planner, dsbardellati@cityofperris.org
Development Services Department
Planning Division
City of Perris
135 N. D Street
Perris, CA 92570

Draft Mitigated Negative Declaration (Draft MND) for the Proposed New Retail Building

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final CEQA document. In the project description, the lead agency proposes the construction of a 12,406 square foot single story retail building on a 1.43 acre ungraded parcel that has rock outcroppings and dense vegetation.

In the Air Quality Section, the lead agency did not quantify the project's construction and operation air quality impacts but based its conclusion that project impacts would be less than significant based on Chapter 6 of the 1993 AQMD CEQA Air Quantity Handbook (Handbook). The AQMD staff has not supported the use of the Handbook Land Use screening tables for a number of years because the screening tables were derived using a now outdated version of the on-road mobile source emission factor model (EMFAC7EP), which has been updated over the years to reflect the current fleet. The Handbook tables were also based on trip rates from an older version of the Institute of Traffic Engineers Trip Generation Manual that has also been updated over time. As a result of relying solely on those tables, the lead agency has not adequately demonstrated that project air quality impacts are less than significant. Therefore, the SCAQMD recommends that the lead agency demonstrate that project impacts are less than significant in the Final MND by estimating short- and long-term air quality impacts using the current California Emission Estimator Model (CalEEMod)¹. CalEEMod is a statewide land use emissions model that can quantify potential project criteria pollutant and greenhouse (GHG) emissions. The lead agency can also follow the calculation methodologies in Chapter 9 and the Appendix to Chapter 9 in the South Coast AQMD's CEQA Air Quality Handbook. Should the lead agency conclude after its analyses that construction or operational air quality impacts exceed the SCAQMD daily significance thresholds, staff has compiled mitigation measures² to be implemented if the air quality impacts are determined to be significant.

¹ CalEEMod is accessible at <http://www.aqmd.gov/ceqa/models.html> .

² Mitigation measure suggestions can be found at http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html .

The AQMD also recommends that the lead agency estimate PM_{2.5} impacts in response to adoption of PM_{2.5} ambient air quality standards by U.S. EPA and CARB. SCAQMD staff has developed a methodology for calculating PM_{2.5} emissions when preparing air quality analyses for California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) documents. To determine if PM_{2.5} air quality impacts are significant, SCAQMD staff has also developed recommended regional and localized significance thresholds. Guidance for calculating PM_{2.5} air quality impacts are available at the AQMD website³.

Finally, it is recommended that the lead agency evaluate localized air quality impacts since it is noted on page one under surrounding land uses and an aerial map inspection that the proposed project is located within one-quarter mile of sensitive receptors (residential properties and Park Avenue Elementary School) south, southeast and east of the proposed project. Because some soil disturbance might be required to remove rocks and vegetation during the site preparation and the proximity of the sensitive receptors, the SCAQMD therefore requests that the lead agency evaluate localized air quality impacts to ensure that any nearby sensitive receptors are not adversely affected by the construction activities that are occurring in close proximity. SCAQMD guidance for performing a localized air quality analysis can be found at the AQMD website⁴.

Please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. The AQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,



Ian MacMillan
Program Supervisor, Inter-Governmental Review
Planning, Rule Development & Area Sources

CM:GM

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³ PM_{2.5} significance analysis guidance can be found at http://www.aqmd.gov/ceqa/handbook/PM2_5/PM2_5.html.

⁴ LST guidance can be found at: <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>.