



South Coast Air Quality Management District

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SENT VIA USPS AND E-MAIL:

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Mitigated Negative Declaration (MND) for the Proposed First Perry Logistics Project

The South Coast Air Quality Management District (SCAQMD) staff 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 MND.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to construct and operate a 241,000-square-foot, high-cube warehouse with unknown occupants on an approximately 11.12-acre site ("Proposed Project"). The Proposed Project is bounded by vacant lots to the north, east, south, and west.

Air Quality and Health Risk Assessment (HRA) Analyses

In the Air Quality Section, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared them to SCAQMD's regional and localized air quality CEQA significance thresholds. The air quality analysis was based on approximately 405 total vehicle trips, including 83 daily truck trips¹. The Lead Agency found that regional and localized construction and operational emissions would be less than significant. Additionally, the Lead Agency performed a HRA and found that the Maximum Exposed Individual Resident cancer risk would be 2.5 in one million, which is below SCAQMD's CEQA significance threshold of 10 in one million for cancer risk².

SCAQMD staff has concerns about the HRA analysis in the MND. The analysis utilized assumptions which have likely led to an under-estimation of the Proposed Project's health risk impacts. Details are included in the attachment. After revising the HRA analysis, should the Lead Agency find that the Proposed Project's health impacts would exceed SCAQMD's CEQA significance thresholds, mitigation measures are required pursuant to the CEQA Guideline Section 15074(b). SCAQMD staff has included a list of mitigation measures in the attachment to assist the Lead Agency in identifying feasible mitigation measures which have the potential to substantially lessen such significant effects (Public Resources Code Section 21002).

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. Please provide SCAQMD staff with written responses to all comments contained herein prior to the adoption of the Final MND.

¹ Appendix A – Air Quality and GHG

² Appendix B – Health Risk Assessment

SCAQMD staff is available to work with the Lead Agency to address the issues raised in the letter and any other air quality and HRA questions that may arise. Please contact Jack Cheng, Air Quality Specialist – CEQA IGR Section, at (909) 396-2448, if you have any questions regarding these comments.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment

LS:JC

RVC170906-04

Control Number

ATTACHMENT

Daily Truck Trip Rate

1. In the air quality analysis, the Lead Agency used the Institute of Transportation Engineers (ITEs) Trip Generation Manual, 9th Edition, 2012 (ITE Manual) 1.68 overall trip generation rate (for cars and trucks totaling approximately 405 daily vehicles). The Trip Generation Rates used a passenger vehicle trip rate of 1.337 vehicles per day and a daily truck trip rate of 0.343 daily truck trip rate (1.68 total daily trip rate minus 1.337 passenger vehicle trip rate or 20.43% daily truck trip rate). The Lead Agency did not use the 0.64 (38.1%) daily truck trip rate recommended by ITEs. Additionally, the Lead Agency used truck vehicle fleet mixture percentages from the City of Fontana Truck Trip Generation Study (Fontana Study) to estimate the Proposed Project's operational air quality impacts in the CalEEMod modeling. By using the 0.343 daily truck trip rate, trucks are estimated at 83 daily truck trips in the MND instead of approximately 154 daily truck trips if the ITE's 0.64 daily truck trip rate is used. Therefore, absent from a specific traffic study of known tenants, the Final MND should use the ITE truck trip rate to estimate daily truck trips so that the Proposed Project's truck trips and associated emissions and health impacts are not underestimated.

Health Risk Assessment (HRA) Analysis

2. Based on a review of the HRA analysis, SCAQMD staff found that the HRA analysis utilized the 2015 revised OEHHA guidelines to estimate the health risks to sensitive receptors in the Proposed Project's vicinity and that the AERMOD dispersion model was used to estimate diesel particulate matter (DPM) concentrations. SCAQMD staff recommends that the Lead Agency revise the HRA analysis based on the following comments.
 - a. The 2015 revised OEHHA guidelines acknowledge that children are more susceptible to the exposure to air toxics and have revised the way cancer risks are estimated to take this into account. Since the emissions from the project-generated trucks get cleaner with time due to existing regulations, it would not be appropriate to average out the emissions over the age bins since this would likely underestimate the health risks to children who would be exposed to higher DPM concentrations during the early years of project operation. Therefore, SCAQMD staff recommends that the DPM emissions for each year of operation be applied to each of the corresponding age bins (i.e. emissions from Year 1 of project operation should be used to estimate cancer risks to the third trimester to 0 year age bin; Year 1 and 2 of project operation should be used to estimate the cancer risks to the 0 to 2 years age bins; and so on).
3. The HRA analysis used separate discrete receptors and placed them randomly. SCAQMD staff recommends that the Lead Agency revise the HRA and use a receptor grid of no more than 100-meter spacing over the existing residences and areas zoned or planned for residential development, in order to ensure that the maximum health impacts to a residential receptor are properly analyzed. Receptor locations should be placed at the boundaries of the residential property and not the residential structure since residents have the potential to spend time outdoors (recreation, dining, etc.). Placing receptors on the residential structure will likely underestimate cancer risks to residents. Therefore, SCAQMD staff recommends that the Lead Agency revise the HRA and start the receptor grid at the property boundaries to ensure potential maximum concentrations are identified.

4. Appendix B – Health Risk Assessment states that all trucks were assumed to idle in the loading areas for 15 minutes. However, the Dispersion Modeling Parameters and Output³ indicates 10 minutes of idling was used in the dispersion modeling. To ensure that the HRA analysis is consistent with the dispersion modeling parameters, SCAQMD staff recommends that the Lead Agency revise the HRA by including 15 minutes of idling
5. Dock loading idling emissions were modeled as line sources. SCAQMD staff recommends that the Lead Agency revise the HRA using a line volume source that spans the entire docking area to ensure that impacts are properly analyzed.

Additional Mitigation Measures for Operational Air Quality Impacts (Mobile Sources)

6. CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant impacts. In the event that the Lead Agency, after revising the HRA analysis based on the comments provided above, finds that the Proposed Project would result in significant health risk impacts, SCAQMD staff recommends incorporating the following on-road mobile-source trucks related mitigation measures in the Final MND. For more information on potential mitigation measures as guidance to the Lead Agency, please visit SCAQMD's CEQA Air Quality Handbook website⁴.
 - Require the use of 2010 and newer haul trucks (e.g., material delivery trucks and soil import/export). In the event that that 2010 model year or newer diesel haul trucks cannot be obtained, provide documentation as information becomes available and use trucks that meet EPA 2007 model year NOx emissions requirements⁵, at a minimum. Additionally, consider other measures such as incentives, phase-in schedules for clean trucks, etc.
 - Have truck routes clearly marked with trailblazer signs, so that trucks will not enter residential areas.
 - Limit truck trips to the amounts analyzed in the Final MND.
 - Provide incentives to promote clean truck incentive programs. Provide electric vehicle (EV) Charging Stations (see the discussion below regarding EV charging stations).
 - Trucks that can operate at least partially on electricity have the ability to substantially reduce the significant NOx impacts from this project. Further, trucks that run at least partially on electricity are projected to become available during the life of the project as discussed in the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy⁶. It is important to make this electrical infrastructure available when the project is built so that it is ready when this technology becomes commercially available. The cost of installing electrical charging equipment onsite is significantly cheaper if completed when the project is built compared to retrofitting an existing building. Therefore, SCAQMD staff recommends that the Lead Agency require the Proposed Project include the appropriate infrastructure to facilitate sufficient electric charging for trucks to plug-in. Similar to the City of Los Angeles requirements for all new projects, SCAQMD staff recommends that the Lead Agency require at least 5% of all vehicle parking spaces (including for trucks) include EV charging stations⁷. Further, electrical hookups should be provided at the

³ Appendix B – HRA, Appendix A – Dispersion Modeling Parameters and Outputs, Page 36.

⁴ South Coast Air Quality Management District. <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

⁵ Based on a review of the California Air Resources Board's diesel truck regulations, 2010 model year diesel haul trucks should have already been available and can be obtained in a successful manner for the project construction California Air Resources Board. March 2016. Available at: <http://www.truckload.org/tca/files/ccLibraryFiles/FileName/00000003422/California-Clean-Truck-and-Trailer-Update.pdf> (See slide #23).

⁶ Southern California Association of Governments. Adopted April 7, 2016. Available at: <http://scagtrpccs.net/Pages/default.aspx>.

⁷ City of Los Angeles. March 30, 2017. Accessed at: http://ladbs.org/LADBSWeb/LADBS_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf.

onsite truck stop for truckers to plug in any onboard auxiliary equipment. At a minimum, electrical panels should appropriately sized to allow for future expanded use.