



# South Coast Air Quality Management District

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SENT VIA E-MAIL:

October 22, 2020

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## **Mitigated Negative Declaration (MND) for the Proposed First Industrial Warehouse at Wilson Avenue Project**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments include recommended revisions to the health risk assessment and air quality mitigation measures that the Lead Agency should include the Final MND.

### South Coast AQMD Staff's Summary of Project Description

The Lead Agency is proposing to construct a 303,228-square-foot industrial, non-refrigerated warehouse distribution facility on 15.6 acres (Proposed Project). The Proposed Project is located on the southeast corner of East Rider Street and Wilson Avenue in the City of Perris. Construction of the Proposed Project is anticipated to occur over a 15-month period and be completed for operation in April 2021<sup>1</sup>. Once operational, the Proposed Project will include 40 dock doors<sup>2</sup> and is expected to generate 169 daily truck trips<sup>3</sup>. Upon review of *Figure 2 – Aerial Map* in the MND and aerial photographs, South Coast AQMD staff found that the closest residential sensitive receptors are located 45 feet west of the Proposed Project<sup>4</sup>.

### South Coast AQMD Staff's Summary of the Air Quality Analysis and Health Risk Assessment (HRA)

In the MND, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared those emissions to South Coast AQMD's recommended localized and regional CEQA significance thresholds for construction. The Proposed Project's regional construction air quality impacts were found to be significant for volatile organic compounds (VOCs) at 128.10 pounds per day (lbs/day)<sup>5</sup>. To reduce those emissions, the Lead Agency is committed to Mitigation Measure Air Quality (MM AQ) 1 for construction, which requires the use of super compliant VOC paints, defined under South Coast AQMD Rule 1113<sup>6</sup>. With implementation of MM AQ 1, the Proposed Project's regional VOCs emissions would be reduced to be less than significant at 22.69 lbs/day<sup>7</sup>. The Lead Agency found that the Proposed

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<sup>1</sup> MND. Page 32.

<sup>2</sup> MND. Page 93.

<sup>3</sup> Appendix B: Health Risk Assessment. Page 13.

<sup>4</sup> MND. Page 37.

<sup>5</sup> MND. Page 29

<sup>6</sup> Appendix A: Air Quality Greenhouse Gas Analysis. Page 10.

<sup>7</sup> MND. Page 32.

Project's localized construction and regional and localized operational air quality impacts would be less than significant<sup>8</sup>.

The Lead Agency also conducted an operational HRA in the MND based on 169 daily truck trips that would visit the Proposed Project. The Lead Agency included on-site and off-site trucks traveling, and on-site truck idling in the air dispersion model, obtained the 2021 average truck emission rates for light-heavy, medium-heavy-duty, and heavy-heavy-duty trucks at different speeds from EMFAC2017, and assigned different truck emission rates to each age bin (e.g., the third trimester to 0 year, 0<2 year, 2<16 year, 16<30 year age bins) to calculate the maximum diesel particulate matter (DPM) concentrations at the sensitive receptor locations. Subsequently, the Lead Agency used the age-specific factors such as the breathing rate for each age bin to calculate the inhalation cancer risk. The Lead Agency found that that the Proposed Project's maximum operational inhalation cancer risk would be 7.5 in one million<sup>9</sup>, which would not exceed South Coast AQMD's CEQA significance threshold of 10 in one million.

#### South Coast AQMD Staff's Comment on the HRA

On September 23, 2020, South Coast AQMD staff received a copy of the MND for the Proposed Project. However, the electronic version of air dispersion modeling, and emissions and cancer risk calculations technical files were not included. Subsequently, South Coast AQMD staff contacted the Lead Agency on October 2, 2020 to request the technical files, and followed up on the request on October 13, 2020<sup>10</sup>. At the time of this comment letter, South Coast AQMD staff has not received the electronic version of the requested technical files and is providing the following comments on the HRA based on a review of the PDF version.

According to the PDF version of the HRA Appendix in the MND, the Lead Agency used a different truck emission rate for each age bin to calculate the DPM concentration at the receptor locations<sup>11</sup>. This is not appropriate for two reasons. First, it is not clear how the age of sensitive receptors affects the DPM concentration since they would likely be exposed to the same emission sources, regardless of age. Second, the HRA Appendix did not explain the reasons for adjusting truck emission rates based on the age of sensitive receptors. Therefore, South Coast AQMD staff recommends that the Lead Agency use the emission factor from each of the operational truck activities (e.g. the maximum on-site idling, on-site travel, and off-site travel) in the air dispersion model to re-calculate the maximum DPM concentration and the Proposed Project's cancer risk in the Final MND, or provide substantial evidence to support the use of age-adjusted emission rates for trucks to calculate the DPM concentration in the record.

#### Conclusion

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 South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues

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<sup>8</sup> Appendix B: Health Risk Assessment. Page 13.

<sup>9</sup> *Ibid.* Page 17.

<sup>10</sup> South Coast AQMD. October 2, 2020 and October 13, 2020. Email correspondence between South Coast AQMD staff (Ms. Margaret Isied) and the Lead Agency, City of Perris (Mr. Alfredo Garcia).

<sup>11</sup> Appendix B: Health Risk Assessment. PDF Page 33.

raised in the comments, responses should provide sufficient details giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and the public who are interested in the Proposed Project.

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 Margaret Isied, Air Quality Specialist, at [misied@aqmd.gov](mailto:misied@aqmd.gov), should you have any questions.

Sincerely,

*Lijin Sun*

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Planning, Rule Development & Area Sources

LS:MI  
RVC200923-02  
Control Number