



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:

June 26, 2024

mevans@cityofperris.org

Mathew Evans, Project Planner
City of Perris - Planning Division
135 North D Street
Perris, CA 92570

Draft Environmental Impact Report (EIR) for the Proposed Perris DC 11 Project (Proposed Project) (SCH No.: 2023090700)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The City of Perris is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff has provided a brief summary of the project information and prepared the following comments organized by topic of concern.

South Coast AQMD Staff's Summary of Project Information in the Draft EIR

Based on the Draft EIR, the Proposed Project would involve constructing and operating a new warehouse of approximately 551,992 square feet (sq. ft) with a maximum of 25% or 136,730 sq. ft to be operated as refrigerated storage.¹ The Proposed Project is an approximately 29.79-acre site located south of Ramona Expressway, east of Webster Avenue, west of Brennan Avenue, and north of Morgan Street in the City of Perris.² The Proposed Project would have 69 loading docks³ and generates 185 daily truck trips associated with the operational activities.⁴ Since the Proposed Project would have refrigerated storage as part of the operation, there are 24 trucks or 48 two-way truck trips per day, including transportation refrigerated units (TRUs).⁵ Based on the aerial photograph, the nearest sensitive receptor (e.g., resident) is less than 50 feet north of the Proposed Project site. The proposed Project is anticipated to start construction in March 2025 and last approximately 12 months.⁶

South Coast AQMD Staff's Comments on the Draft EIR

Inconsistent Analysis between Draft EIR and Appendix C regarding the Health Risk Assessment

Section 5.2 – Air Quality of the Draft EIR includes the health risk assessment (HRA) analysis for construction and operational scenarios associated with specific sensitive receptor locations (e.g., residential, worker, and school). In addition, Appendix C – Mobile Source Health Risk Assessment

¹ Draft EIR. Page 3-2.

² *Ibid.* Page 3-1.

³ *Ibid.* Page 3-2.

⁴ *Ibid.* Table 5.14-2 – Project Trip Generation. Page 5.14-16.

⁵ *Ibid.* Page 5.2-26.

⁶ *Ibid.* Page 3-5.

presents a similar analysis but utilizes different sensitive receptor locations than those in the Draft EIR. South Coast AQMD staff found that the HRA analysis is inconsistent for construction and operation scenarios for the residential receptors, leading to different cancer risk values. The conflicting information (highlighted) is shown in Table A below, with the map showing receptor locations.

Table A – Inconsistent Information between Draft EIR and Appendix C

		DEIR ⁷	Appendix C ⁸
Construction	Receptor Location-Residential	Location R2, approx. 492 ft north of the Project site	Location R6, approx. 40 ft north of the Project site
	Maximum incremental cancer risk (MICR)	0.18 in one million	2.95 in one million
Operation	Receptor Location - Residential	Location R2, approx. 492 ft north of the Project site	Location R6, approx. 40 ft north of the Project site
	MICR	0.85 in one million	3.38 in one million

Figure 1: Sensitive Receptor Locations⁹



Although the cancer risks under the construction and operation impacts are less than the South Coast AQMD Air Quality Significance Thresholds¹⁰ for Toxic Air Contaminants (TACs), which

⁷ Ibid. Page 5.2-41.

⁸ Appendix C – Mobile Source Health Risk Assessment. Pages 23 and 24.

⁹ Ibid. Page 5.2-21.

¹⁰ South Coast AQMD Air Quality Significance Thresholds. Access at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf>

is 10 in one million, it is recommended that the Lead Agency revise the analysis in the Draft EIR and Appendix C with consistent information to have no discrepancy in the CEQA documents.

Incorrect South Coast AQMD Localized Air Quality Thresholds Units

Section 5.2 – Air Quality in the Draft EIR and Appendix B – Air Quality Impact Analysis refer to the South Coast AQMD Air Quality Significance Thresholds for the localized construction and operational analysis and presents the thresholds in Table 5.2-5¹¹ and Table 3-1,¹² respectively. The localized air quality threshold values are correct, but the units are inaccurate. The proper units for localized air quality thresholds should be ppm for NO_x and CO and ug/m³ for PM₁₀ and PM_{2.5} instead of lb/day. The Lead Agency is recommended to revise the localized air quality threshold units in the Final EIR and its appendices.

Incorrect South Coast AQMD Rule Reference

Section 5.2 – Air Quality in the Draft EIR discusses the local regulations, and under the City of Perris Good Neighborhood Guidelines, Policy 2.1a states that “*restricting diesel engine and construction equipment idling to 5 minutes or less (SCAQMD Rule 2485) ...*”¹³ The statement refers to South Coast AQMD Rule 2485; however, there is no such rule in the South Coast AQMD rule book.¹⁴ It is important to note that the correct sources should be utilized while discussing information. Thus, the Lead Agency should revise the discussion and include the proper source in the Final EIR.

Additional Recommended Air Quality and Greenhouse Gases Mitigation Measures and Project Design Considerations

CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse air quality impacts. To further reduce the Proposed Project’s air quality impacts, South Coast AQMD recommends incorporating the following mitigation measures and project design considerations into the Final EIR.

Mitigation Measures for Operational Air Quality Impacts

Mobile Sources

1. Require zero-emission (ZE) or near-zero emission (NZE) on-road haul trucks, such as heavy-duty trucks with natural gas engines that meet the CARB’s adopted optional NO_x emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr), if and when feasible.

Note: Given the state’s clean truck rules and regulations aiming to accelerate the utilization and market penetration of ZE and NZE trucks, such as the Advanced Clean Trucks Rule and the Heavy-duty Low NO_x Omnibus Regulation, ZE and NZE trucks will become increasingly more available to use.

¹¹ *Ibid.* Page 5.2-24.

¹² Appendix B – Air Quality Impact Analysis. Page 48.

¹³ *Ibid.* Page 5.2-10.

¹⁴ South Coast AQMD Rule Book. Access at: <http://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book>

2. Require a phase-in schedule to incentivize the use of cleaner operating trucks to reduce any significant adverse air quality impacts.

Note: South Coast AQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency.

3. Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the Final EIR. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the Proposed Project through CEQA prior to allowing this higher activity level.
4. Provide electric vehicle (EV) charging stations or, at a minimum, provide electrical infrastructure, and electrical panels should be appropriately sized. Electrical hookups should be provided for truckers to plug in any onboard auxiliary equipment.

Other Area Sources

1. Maximize the use of solar energy by installing solar energy arrays.
2. Use light-colored paving and roofing materials.
3. Utilize only Energy Star heating, cooling, and lighting devices and appliances.

Design Considerations for Reducing Air Quality and Health Risk Impacts

1. Clearly mark truck routes with trailblazer signs so that trucks will not travel next to or near sensitive land uses (e.g., residences, schools, daycare centers, etc.).
2. Design the Proposed Project such that truck entrances and exits are not facing sensitive receptors and trucks will not travel past sensitive land uses to enter or leave the Proposed Project site.
3. Design the Proposed Project such that any truck check-in point is inside the Proposed Project site to ensure no trucks are queuing outside.
4. Design the Proposed Project to ensure that truck traffic inside the Proposed Project site is as far away as feasible from sensitive receptors.
5. Restrict overnight truck parking in sensitive land uses by providing overnight truck parking inside the Proposed Project site.

Lastly, the South Coast AQMD also suggests that the Lead Agency conduct a review of the following references and incorporate additional mitigation measures as applicable to the Proposed Project in the Final EIR:

1. State of California – Department of Justice: Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act¹⁵
2. South Coast AQMD 2022 Air Quality Management Plan,¹⁶ specifically:
 - a) Appendix IV-A – South Coast AQMD’s Stationary and Mobile Source Control Measures
 - b) Appendix IV-B – CARB’s Strategy for South Coast
 - c) Appendix IV-C – SCAG’s Regional Transportation Strategy and Control Measure
3. United States Environmental Protection Agency (U.S. EPA): Mobile Source Pollution - Environmental Justice and Transportation.¹⁷

South Coast AQMD Air Permits and Role as a Responsible Agency

The Draft EIR mentions that the Proposed Project would require an emergency generator and a single fire water pump.¹⁸ Hence, air permits from South Coast AQMD will be required, and the role of South Coast AQMD will change from a Commenting Agency to a Responsible Agency under CEQA. In addition, if South Coast AQMD is identified as a Responsible Agency, per CEQA Guidelines Sections 15086, the Lead Agency is required to consult with South Coast AQMD. In addition, CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of evaluating the applications for air permits. For these reasons, the Final EIR should include a discussion about any new stationary and portable equipment requiring South Coast AQMD air permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project.

The Final EIR should also include calculations and analyses for construction and operation emissions for the new stationary and portable sources, as this information will also be relied upon as the basis for the permit conditions and emission limits for the air permit(s). Please contact South Coast AQMD’s Engineering and Permitting staff at (909) 396-3385 for questions regarding what types of equipment would require air permits. For more general information on permits, please visit South Coast AQMD’s webpage at <http://www.aqmd.gov/home/permits>.

Conclusion

As set forth in California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), the Lead Agency shall evaluate comments from public agencies on the environmental issues and prepare a written response at least 10 days prior to certifying the Final EIR. As such, please provide South Coast AQMD written responses to all comments contained herein at least 10 days prior to the certification of the Final EIR. In addition, as provided by CEQA

¹⁵ State of California – Department of Justice, Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act. Available at: <https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf>

¹⁶ South Coast AQMD, 2022 Air Quality Management Plan (AQMP). Available at: <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan>

¹⁷ United States Environmental Protection Agency (U.S. EPA), Mobile Source Pollution - Environmental Justice and Transportation. Available at: <https://www.epa.gov/mobile-source-pollution/environmental-justice-and-transportation>

¹⁸ *Ibid.* Page 5.2-26.

Guidelines Section 15088(c), if the Lead Agency's position is at variance with recommendations provided in this comment letter, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided.

Thank you for the opportunity to provide comments. 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 Danica Nguyen, Air Quality Specialist, at dnguyen1@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

Sam Wang
Program Supervisor, CEQA IGR
Planning, Rule Development & Implementation

SW:DN
RVC240515-07
Control Number