



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Draft Environmental Impact Report (Draft EIR) for the Proposed Duke Warehouse at Patterson Avenue and Markham Street Project (SCH No.: 2017101009)

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 EIR.

SCAQMD Staff's Summary of Project Description

The lead agency proposes the construction and operation of approximately 811,620 square feet (SF) of high-cube non-refrigerated warehouse/distribution uses, on a 37.5-acre portion (proposed project) of the 3,500-acre Perris Valley Commerce Center Specific Plan (PVCCSP).¹ The Project site is located in the northern portion of the City of Perris, on the southeastern corner of Patterson Avenue and Markham Street. Construction is expected to occur over a period of approximately one year, beginning no earlier than October 2018.²

SCAQMD Staff's Summary of Air Quality

The lead agency determined that the project's operational emissions will exceed SCAQMD's significance thresholds for criteria pollutant NO_x, emitting 94.36 lbs/day.³ Based on Figure 1-2 of the Draft EIR the proposed project is located in close proximity to residences. The nearest residence is less than 25 feet east of the proposed project site.⁴

General Comments

CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate the proposed project's impacts. Therefore, SCAQMD staff recommends that the lead agency incorporate additional mitigation measures in the final EIR, to further reduce the project's significant regional NO_x emissions. Please see the enclosed attachment for detailed comments on the Draft EIR.

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), SCAQMD staff requests that the lead agency provide SCAQMD staff with written responses to all comments contained herein prior to the certification of the final EIR. In addition, issues raised in the comments should be addressed in detail 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 will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do

¹ Draft EIR. Section 1.4.1, *Executive Summary*, Page 1-5.

² Draft EIR. Section 5.1.5, *Air Quality*, Page 5.1-28.

³ Draft EIR. Section 5.1.5, *Air Quality*, Page 5.1-30, Table 5.1-G

⁴ Draft EIR. Section 1.3, *Executive Summary*, Page 1-4, Table 1-A.

not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful or useful to decision makers and the public who are interested in the proposed project.

SCAQMD staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Robert Dalbeck, Assistant Air Quality Specialist - CEQA IGR Section, at rdalbeck@aqmd.gov, if you have any questions regarding these comments.

Sincerely,

Daniel Garcia

Daniel Garcia

Program Supervisor

Planning, Rule Development & Area Sources

Attachment
DG/RD
RVC180703-03
Control Number

ATTACHMENT

Comment on Air Quality Analysis Methodology

1. The lead agency quantified the proposed project's regional and localized operational emissions based on high-cube non-refrigerated warehouse/distribution building uses. However, given that the future tenants of the warehouse are undetermined at this time and that the Draft EIR includes mitigation measures for transportation refrigeration units (TRUs), it is reasonably foreseeable that the proposed project could be used as a cold storage facility. Therefore, SCAQMD staff recommends that the lead agency disclose potential operational emissions from NOx and diesel particulate matter from TRUs in the final EIR, unless the lead agency expressly restricts the use of the proposed project to a non-cold storage warehouse.
2. CalEEMod generates default values for the number of construction equipment units needed to facilitate each construction phase of a project. For a project that is the size of the proposed project, CalEEMod generates a default value of two units per each type of paving equipment for the 19.18 acres of paving required for the proposed project. However, the lead agency used an adjusted value of one unit per paving equipment.⁵ In the final EIR, SCAQMD staff recommends the lead agency use the default values to estimate emissions resulting from paving activities or justify the use of non-default values.

Recommended Mitigation Measures

1. SCAQMD staff recommends that the lead agency include the mitigation measures listed below in the final EIR to further reduce the proposed project's significant regional NOx emissions during operation and further minimize localized air quality impacts.
 - Require all diesel-fueled trucks accessing the proposed project to meet the U.S. Environmental Protection Agency/California Air Resource Board truck engine standard for Model Year 2010 or better. 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 requirements, at a minimum. Additionally, consider other measures such as incentives, phase-in schedules for clean trucks, etc.
 - Limit the daily number of trucks allowed at the proposed project to levels analyzed in the CEQA document. 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 land use or higher activity level.
 - Provide electric vehicle (EV) Charging Stations (see the discussion below regarding EV charging stations).
 - The lead agency should require mitigation that requires accelerated phase-in for non-diesel powered trucks. For example, natural gas trucks, including Class 8 HHD trucks, are commercially available today. Natural gas trucks can provide a substantial reduction in health risks and may be more financially feasible today due to reduced fuel costs compared to diesel. In the final EIR, the lead agency should require a phase-in schedule for these cleaner operating trucks to reduce any significant adverse air quality impacts. SCAQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the lead agency.

⁵ Draft EIR. Appendix B.1, *Air Quality/Greenhouse Gas Analysis*, Pg. 2 and 3

- 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 Strategy (2016-2040 RTP/SCS)³. 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 the lead agency require the proposed project and other plan areas that allow truck parking to be constructed with 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 stations. Further, electrical hookups should be provided at the onsite truck stop for truckers to plug in any onboard auxiliary equipment. At a minimum, electrical panels should be appropriately sized to allow for future expanded use.
- Design the industrial building such that entrances and exits are such that trucks are not traversing past neighbors or other sensitive receptors.
- Design the industrial building such that any check-in point for trucks is well inside the proposed project site to ensure that there are no trucks queuing outside of the facility.
- Design the industrial building to ensure that truck traffic within the proposed project site is located away from the property line(s) closest to its residential or sensitive receptor neighbors.
- Restrict overnight parking in residential areas.
- Establish overnight parking within the industrial building where trucks can rest overnight.
- Establish area(s) within the proposed project site for repair needs.
- Develop, adopt and enforce truck routes both in and out of city, and in and out of facilities.
- Create a buffer zone of at least 300 meters (roughly 1,000 feet), which can be office space, employee parking, greenbelt, etc. between the proposed project and sensitive receptors.
- Limit delivery vehicles' idling time to no more than five minutes. For any delivery vehicle that is expected to take longer than five minutes, the vehicle's operator shall be required to shut off the engine. Notify the vendors of these idling requirements at the time that the delivery purchase order is issued and again when vehicles enter the gates of the facility. To further ensure that drivers understand the vehicle idling requirement, post signs at the facility's entry gates stating that idling longer than five minutes is not permitted.
- Maximize use of solar energy including solar panels; installing the maximum possible number of solar energy arrays on the building roofs and/or on the project site to generate solar energy for the facility.
- Limit parking supply and unbundle parking costs for employees.
- Maximize the planting of trees in landscaping and parking lots.

- Use light colored paving and roofing materials.
- Install light colored “cool” roofs and cool pavements.
- Require use of electric or alternatively fueled sweepers with HEPA filters.

If no additional feasible mitigation measures or project design features exist that would reduce the proposed project’s regional NOx emissions during operation to less than significant levels, the lead agency, pursuant to CEQA Guidelines 15093, is to adopt a statement of overriding considerations that fully address, using substantial evidence to support a determination.