



# South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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## **Mitigated Negative Declaration (MND) for the Proposed IDI Indian Avenue and Ramona Expressway Warehouse Project**

South Coast Air Quality Management District (South Coast AQMD) 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.

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

The Lead Agency proposes to construct a 428,730-square-foot non-refrigerated distribution warehouse, including 66 dock doors, 206 parking spaces and 205 trailer parking spaces on 24.2 acres (Proposed Project). At this time, "no cold storage is proposed or planned."<sup>1</sup> The Proposed Project is located on the northwest corner of Ramona Expressway and Indian Avenue. Upon review of Figure 2-*Aerial Map* in the MND, and aerial photographs, South Coast AQMD staff found that there are residential uses within 187 feet of the Proposed Project<sup>2</sup>. Construction of the Proposed Project is anticipated to occur over 20 months, with operation beginning in 2020<sup>3</sup>. During operation, the Proposed Project is expected to generate 193 truck trips per day<sup>4</sup>.

### South Coast AQMD Staff's Summary of Air Quality Analysis

In the Air Quality Analysis section, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared those emissions to South Coast AQMD's recommended regional and localized air quality CEQA significance thresholds. Based on the analysis, the Lead Agency found that the Proposed Project's construction and operational air quality impacts would be less than significant, after the implementation of Perris Valley Commerce Center Specific Plan (PVCCSP) mitigation measures (MMs) AIR 1 through AIR 10 to reduce construction-related emissions<sup>5</sup>, and PVCCSP MMs AIR 11, AIR 13 through AIR 15, and AIR 18 through AIR 20 to reduce operation-related emissions<sup>6</sup>. PVCCSP MMs AIR 1 through AIR 10 would require the Proposed Project to implement various dust control measures, five-minute idling limitations, Tier 3 construction equipment, and "super-compliant" low VOC paint. PVCCSP MMs AIR 11, AIR 13 through AIR 15, and AIR 18 through AIR 20 would require the Proposed Project to post signs that restrict idling to less than five minutes, to promote the use of "clean" trucks, and to construct buildings to exceed the 2016 California Green Building Standards Title 24, Part 11 efficiency requirements by 15%<sup>7</sup>. The Lead Agency also prepared a mobile source Health Risk

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<sup>1</sup> MND. Page 47.

<sup>2</sup> MND. Figure 2-*Aerial Map*. Page 16.

<sup>3</sup> *Ibid.* Page 6.

<sup>4</sup> *Ibid.* Page 47.

<sup>5</sup> *Ibid.* Page 37.

<sup>6</sup> *Ibid.* Page 40.

<sup>7</sup> *Ibid.* Page 42.

Assessment (HRA) and found that the maximum incremental cancer risk would be 0.60 in one million<sup>8</sup> which is below South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk<sup>9</sup>.

#### South Coast AQMD Staff's Comments

South Coast AQMD staff recommends that the Lead Agency incorporate additional project-specific mitigation measures to further reduce the Proposed Project's construction and operational emissions and health risk impacts on the nearby sensitive receptors. South Coast AQMD staff has also compiled a list of mitigation measures as guidance to the Lead Agency that should be reviewed for incorporation in the Final MND. Please see the attachment for more information.

#### 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 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. Further, if the Lead Agency makes a finding that additional recommended mitigation measure is not feasible, the Lead Agency should describe the specific reasons for rejecting or substituting the mitigation measures in the Final MND (CEQA Guidelines Section 15074.1).

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 Robert Dalbeck, Assistant Air Quality Specialist, at [RDalbeck@aqmd.gov](mailto:RDalbeck@aqmd.gov) or (909) 396-2139, should you have any questions.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment  
LS:RD  
RVC190625-05  
Control Number

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<sup>8</sup> MND. Page 47.

<sup>9</sup> South Coast AQMD has developed the CEQA significance threshold of 10 in one million for cancer risk. When South Coast AQMD acts as the Lead Agency, South Coast AQMD staff conducts a HRA, compares the maximum cancer risk to the threshold of 10 in one million to determine the level of significance for health risk impacts, and identifies mitigation measures if the risk is found to be significant.

## ATTACHMENT

### Additional Recommended Mitigation Measures

1. CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse impact. To further reduce the Proposed Project's construction and operational NOx emissions at 75.12 lbs/day and 49.91 lbs/day, respectively, South Coast AQMD staff recommends that the Lead Agency incorporate the following project-specific mitigation measures for the Proposed Project in the Final MND. For more information on potential mitigation measures as guidance to the Lead Agency, please visit South Coast AQMD's CEQA Air Quality Handbook website<sup>10</sup>.

#### *Mitigation Measure for Construction Air Quality Impacts*

- While the Lead Agency has committed to implementing PVCCSP MM AIR 6, which requires construction equipment to meet or exceed Tier 3 emissions standards, South Coast AQMD staff recommends that the Lead Agency go beyond this mitigation measure by requiring the use of off-road diesel-powered construction equipment that meets or exceeds the California Air Resources Board (CARB) and U.S. Environmental Protection Agency (USEPA) Tier 4 off-road emissions standards for equipment rated at 50 horsepower or greater during construction of the Proposed Project. Such equipment will be outfitted with Best Available Control Technology (BACT) devices including a CARB certified Level 3 Diesel Particulate Filters (DPFs). Level 3 DPFs are capable of achieving at least 85 percent reduction in particulate matter emissions<sup>11</sup>. A list of CARB verified DPFs are available on the CARB website<sup>12</sup>.
- To ensure that Tier 4 construction equipment or better will be used during the Proposed Project's construction, South Coast AQMD staff recommends that the Lead Agency include this requirement in applicable bid documents, purchase orders, and contracts. Successful contractor(s) must demonstrate the ability to supply the compliant construction equipment for use prior to any ground disturbing and construction activities. A copy of each unit's certified tier specification or model year specification and CARB or South Coast AQMD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment. Additionally, the Lead Agency should require periodic reporting and provision of written construction documents by construction contractor(s) to ensure compliance, and conduct regular inspections to the maximum extent feasible to ensure compliance.
- In the event that construction equipment cannot meet the Tier 4 engine certification, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is approved by the Lead Agency before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, construction equipment with Tier 3 emissions standards, reduction in the number and/or horsepower rating of construction equipment, limiting the number of daily construction haul truck trips to and from the Proposed Project, using cleaner vehicle fuel, and/or limiting the number of individual construction project phases occurring simultaneously.
- Require the use of zero-emission (ZE) or near-zero emission (NZE) heavy-duty haul trucks during construction, such as trucks with natural gas engines that meet CARB's adopted optional

<sup>10</sup> South Coast AQMD. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

<sup>11</sup> California Air Resources Board. November 16-17, 2004. *Diesel Off-Road Equipment Measure – Workshop*. Page 17. Accessed at: [https://www.arb.ca.gov/msprog/ordiesel/presentations/nov16-04\\_workshop.pdf](https://www.arb.ca.gov/msprog/ordiesel/presentations/nov16-04_workshop.pdf).

<sup>12</sup> *Ibid*. Page 18.

NOx emissions standard of 0.02 grams per brake horsepower-hour (g/bhp-hr). At a minimum, require that operators of heavy-duty haul trucks visiting the Proposed Project during construction commit to using 2010 model year<sup>13</sup> or newer engines that meet CARB's 2010 engine emission standards of 0.01 g/bhp-hr for particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks. Include analyses to evaluate and identify sufficient power available for zero emission trucks and supportive infrastructures in the Energy and Utilities and Service Systems Sections of the Final MND, where appropriate. Require that contractor(s) maintain records of all trucks visiting the Proposed Project and make these records available to the Lead Agency upon request. The records will serve as evidence to prove that each truck called to the Proposed Project during construction meets the minimum 2010 model year engine emission standards. The Lead Agency should conduct regular inspections of the records to the maximum extent feasible and practicable to ensure compliance with this mitigation measure.

*Mitigation Measures for Operational Air Quality Impacts from Mobile Sources*

- The Lead Agency has committed to implementing PVCCSP MM AIR 13, which requires the developer/successor-in-interest to provide building tenants with information regarding clean truck state programs, such as the Carl Moyer Program, to encourage the use of "clean" truck fleets.

Pursuant to CEQA Guidelines Section 15126.4, mitigation measures are those capable of minimizing or reducing significant adverse impacts. Mitigation measures that are used to reduce significant adverse environmental impacts to the less than significant level in a CEQA document must be fully enforceable through permit conditions, agreements, or other legally binding instruments (CEQA Guidelines Section 15126.4(a)(2)). While it is important to share information about South Coast AQMD's Carl Moyer Program and the State's clean truck fleets programs, providing information alone does not mitigate or reduce emissions. Therefore, South Coast AQMD staff recommends that the Lead Agency go beyond providing information by requiring the use of ZE or NZE heavy-duty trucks during operation, such as trucks with natural gas engines that meet CARB's adopted optional NOx emission standard of 0.02 grams per brake horsepower-hour (g/bhp-hr). At a minimum, the Lead Agency should require that operators of heavy-duty trucks visiting the Proposed Project during operation commit to using 2010 model year<sup>14</sup> or newer engines that meet CARB's 2010 engine emission standards of 0.01 g/bhp-hr for particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks. Include analyses to evaluate and identify sufficient power available for zero emission trucks and supportive infrastructures in the Energy and Utilities and Service Systems Sections of the Final MND, where appropriate.

To monitor and ensure ZE, NZE, or 2010 model year trucks are used at the Proposed Project, the Lead Agency should require that operators maintain records of all trucks associated with the Proposed Project's operation, and make these records available to the Lead Agency upon request. The records will serve as evidence to prove that each truck called to the Proposed Project during operation meets the minimum 2010 model year engine emission standards. Alternatively, the Lead Agency should require periodic reporting and provision of written records by operators, and conduct regular inspections of the records to the maximum extent feasible and practicable.

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<sup>13</sup> CARB adopted the statewide Truck and Bus Regulation in 2010. The Regulation requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent. More information on the CARB's Truck and Bus Regulations is available at: <https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.html>.

<sup>14</sup> *Ibid.*

- Provide electric vehicle (EV) charging stations. The 2016 California Green Building Standards Code, Part 11 calls for nonresidential projects with 201 vehicle parking spaces or more to include EV charging stations in at least six percent of all vehicle parking spaces<sup>15</sup> and include designated parking for clean air vehicles in at least eight percent of all vehicle parking spaces<sup>16</sup>. Since the Proposed Project includes a total of 206 parking spaces and 205 trailer parking spaces, the Lead Agency should require at least six percent of all vehicle parking spaces to include EV charging stations and at least eight percent of all vehicle parking spaces to be designated for clean air vehicles. Vehicles that can operate at least partially on electricity have the ability to substantially reduce NOx emissions. It is important to make this electrical infrastructure available when the Proposed Project is built. The cost of installing electrical charging equipment onsite is significantly cheaper if completed when the project is built compared to retrofitting an existing building. Additionally, electrical panels should be appropriately sized to allow for future expanded use. Therefore, South Coast AQMD staff recommends the Lead Agency require the Proposed Project to provide the appropriate infrastructure to facilitate sufficient electric charging for vehicles to plug-in in the Final MND. Additionally, the Lead Agency should include analyses to evaluate and identify sufficient power available for zero emission trucks and supportive infrastructures (e.g., EV charging stations) in the Energy and Utilities and Service Systems Sections of the Final MND, where appropriate.
- Limit the daily number of truck trips allowed at the Proposed Project to the level that was analyzed in the Final MND (e.g., 193 daily truck trips). If higher daily truck volumes are anticipated during operation than what was analyzed in the MND, the Lead Agency should commit to re-evaluating the Proposed Project's air quality and health risks impacts through CEQA prior to allowing higher activity levels (CEQA Guidelines Section 15162).
- Require trucks to use the truck route that was used to analyze the air quality and HRA impacts (Harley Knox Boulevard to Indian Avenue) in the Final MND.
- Have truck routes clearly marked with trailblazer signs, so that trucks will not enter residential areas that are adjacent to portions of the designated truck routes analyzed in the Final MND.
- Design the warehouse such that dock doors are located as far as possible from the residences located within 187 feet east of the Proposed Project.
- 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, where feasible.
- Design the warehouse such that entrances and exits are such that trucks are not traversing past the residences located within 187 feet of the Proposed Project to the northeast by Driveway 3.
- Design the warehouse 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 and 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.

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<sup>15</sup> 2016 California Green Building Standards Code, Part 11. Chapter 5, *Nonresidential Mandatory Measures*. Table 5.106.5.3.3. Page 35. Accessed at: <https://codes.iccsafe.org/content/chapter/10708/>.

<sup>16</sup> *Ibid.* Table 5.106.5.2. Page 34. Accessed at: <https://codes.iccsafe.org/content/chapter/10708/>.

- Establish area(s) within the Proposed Project site for repair needs and ensure that these designated areas are away from any sensitive land uses.

*Mitigation Measures for Operational Air Quality Impacts from Area Sources*

- Maximize the use of solar energy including solar panels. Installing the maximum possible number of solar energy arrays on the building roofs and/or on the Proposed Project site to generate solar energy for the warehouse and/or EV charging stations.
- Require the use of electric landscaping equipment, such as lawn mowers and leaf blowers.
- Require use of electric or alternatively fueled sweepers with HEPA filters.
- Maximize the planting of trees in landscaping and parking lots.
- Use light colored paving and roofing materials.
- Utilize only Energy Star heating, cooling, and lighting devices, and appliances.