



# South Coast Air Quality Management District

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September 12, 2019

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## Mitigated Negative Declaration (MND) for the Proposed Duke Perry Street and Barrett Avenue 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 148,297-square-foot non-refrigerated distribution warehouse, including 25 dock doors, 79 parking spaces, 17 clean air/vanpool parking spaces, and 21 trailer parking spaces on 7.26 acres (Proposed Project). The Proposed Project is located on the southeast corner of Perry Street and Barrett Avenue. Upon reviews of Figure 2, *Aerial Map*, in the MND, and aerial photographs, South Coast AQMD staff found that multiple residential uses are located south and east to the Proposed Project<sup>1</sup>. Construction of the Proposed Project is anticipated to occur over 12 months, with operation beginning in 2020<sup>2</sup>. During operation, the Proposed Project is expected to generate approximately 25 heavy-duty, diesel-fueled truck trips or 77 passenger car equivalent (PCE) trips per day<sup>3</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 2 through AIR 9 to reduce construction-related emissions<sup>4</sup>, and PVCCSP MMs AIR 11 through AIR 14, and AIR 18 through AIR 20 to reduce operation-related emissions<sup>5</sup>. PVCCSP MMs AIR 2 through AIR 9 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 through AIR 14, 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>6</sup>. The Lead Agency also prepared a mobile source health risk assessment (HRA) analysis and found that the maximum

<sup>1</sup> MND. Figure 2-*Aerial Map*. Page 12.

<sup>2</sup> *Ibid.* Page 5.

<sup>3</sup> *Ibid.* Appendix J, *Traffic Impact analysis*. PDF Page 69.

<sup>4</sup> *Ibid.* Page 30 through 31.

<sup>5</sup> *Ibid.* Page 33 through 34.

<sup>6</sup> *Ibid.* Page 42.

incremental cancer risk would be 5.3 in one million<sup>7</sup> which is below South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk<sup>8</sup>.

#### South Coast AQMD Staff's General Comments

The Proposed Project would be developed in close proximity to several warehouses that are currently being developed by the Lead Agency with overlapping construction and operational schedules. South Coast AQMD staff recommends that the Lead Agency consider the Proposed Project's air quality and health risk impacts in connection with other warehouses that are located in close proximity to the Proposed Project. In addition to the PVCCSP MMs that have been incorporated in the MND as requirements for the Proposed Project, South Coast AQMD staff recommends that the Lead Agency incorporate additional mitigation measures to reduce exposures of sensitive receptors 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 measures are not feasible, the Lead Agency should describe the specific reasons for rejecting or substituting these 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  
RVC190814-01  
Control Number

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<sup>7</sup> MND. Page 36.

<sup>8</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****Cumulative Air Quality Impacts Analysis**

1. The Lead Agency found that the Proposed Project would not have cumulatively considerable environmental effects<sup>9</sup>; however, South Coast AQMD staff is concerned that the air quality and health risks impacts of the Proposed Project were not evaluated in connection with the effects of present and probable future warehouse projects (CEQA Guidelines 15065(a)(3)). Based on a review of other CEQA documents for warehouse projects prepared by the Lead Agency that the South Coast AQMD received during the months of January 2018 and June 2019, South Coast AQMD staff found that the Proposed Project would be built next to two probable future warehouses<sup>10</sup> (Table 1: *List of Probable Future Warehouses In the Vicinity of the Proposed Project* and Figure 1: *Probable Future Warehouses In the Vicinity of the Proposed Project*). In the MND, the Lead Agency found that the Proposed Project would not have any significant, adverse cumulative air quality impacts based on the finding that the Proposed Project's project-level regional air quality impacts were less than significant. However, according to Table 1, the Proposed Project's construction and operational activities would overlap with the construction and operational activities of two other warehouse projects that are located within 1,000 feet of the Proposed Project. As such, the Proposed Project's regional and localized criteria pollutants emissions, as well as health impacts, from heavy-duty, diesel-fueled haul truck trips may have been individually limited but cumulatively considerable. Additionally, as shown in Figure 1, existing sensitive receptors (e.g., residential uses) are located along Perry Street and Barrett Avenue. Therefore, South Coast AQMD staff recommends that the Lead Agency revise the Air Quality Analysis in the Final MND to include a meaningful evaluation of the Proposed Project's cumulative air quality and health risk impacts. This recommendation facilitates the purpose and goal of CEQA on public disclosure and will provide useful information to decision makers and the public who are interested in the Proposed Project. In the event that the Lead Agency finds that the Proposed Project's effects on air quality would be cumulatively significant, mitigation measures will be required to reduce the effects to less than significant pursuant to CEQA Guidelines Sections 15070 and 15071(e).

**Table 1: List of Probable Future Warehouses in the Vicinity of the Proposed Project<sup>1</sup>**

<b>Project Name</b>	<b>Size (sq.ft)</b>	<b>Location<sup>2</sup> (from Proposed Project)</b>	<b>Constructio n Schedule</b>	<b>Operational Schedule</b>	<b>Estimated Number of Truck Trips During Operation<sup>3</sup></b>
Duke Perry Street and Barrett Avenue Warehouse (Proposed Project)	148,297	(Proposed Project)	2019-2020	2020	26
IDI Indian Avenue and Ramona Expressway Warehouse	428,730	200 feet Southwest	2019 – 2020	2020	121
Duke Warehouse at Perris Boulevard and Markham Street	1,189,860	800 feet Northeast	2018 – 2019	2019	272

**Source:** South Coast AQMD staff. September 11, 2019.

**Notes:** 1. This table was generated by South Coast AQMD staff based on the information from the MND for the Proposed Project, the MND for the IDI Indian Avenue and Ramona Development Plan Review (DPR) 18-00002, and the Environmental Impact Report for the Duke Warehouse at Perris Blvd and Markham Street Project DPR17-00002. 2. The location information is based on a review of aerial photographs by South Coast AQMD staff. 3. Estimated number of truck trips during operation was derived from the CEQA documents for these warehouse projects.

<sup>9</sup> MND. Page 27.

<sup>10</sup> South Coast AQMD staff has received two other CEQA documents for the following projects: IDI Indian Avenue and Ramona Development Plan Review (DPR) 18-00002, and Duke Warehouse at Perris Blvd and Markham Street Project DPR17-00002.

**Figure 1: Probable Future Warehouses In the Vicinity of the Proposed Project**

Source: South Coast AQMD staff. September 11, 2019.      █ Sensitive Receptors (Residences)      █ Probable Future Warehouses

### **Additional Recommended Mitigation Measures**

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 significant adverse impacts. To further reduce the Proposed Project's air quality and health risk impacts on the nearby sensitive receptors (residences), South Coast AQMD staff has compiled a list of design strategies as guidance to the Lead Agency that should be reviewed for incorporation as mitigation measures in the Final MND.

- 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.

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 reduce emissions. The Lead Agency should go beyond providing information by requiring the use of zero-emission (ZE) or near-zero emission (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 may require that operators of heavy-duty trucks visiting the Proposed Project during operation commit to using 2010 model year 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.

To monitor and ensure ZE, NZE, or 2010 model year or newer 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 trucks visiting the Proposed Project meet 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.

- Design the Proposed Project such that the 25 dock doors are located as farthest away as feasible from the residences located adjacent to the southern and eastern boundaries of the Proposed Project. For example, the Proposed Project is located across Perry Street south of the existing warehouse uses. Locating the 25 dock doors near the northern boundary of the Proposed Project facing the existing warehouse uses would minimize the exposure of sensitive receptors to diesel particulate matter (DPM) from trucks entering/exiting and idling at the Proposed Project. Currently, the dock doors are located near the southern boundary of the Proposed Project, adjacent to the existing residence.
- Require trucks visiting the Proposed Project to use the truck route (i.e., Harley Knox Boulevard to Indian Avenue) that was used to analyze the Proposed Project's air quality and HRA impacts 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.
- 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 (e.g., residences), where feasible. Currently, the Proposed Project includes 3,000 square feet of office space, but it is located in the northwest portion of the Proposed Project site, which is the furthest away from the nearby sensitive receptors (e.g., residences) and not being used as a potential buffer zone between the nearby sensitive receptors and the proposed warehouse uses.
- Design the Proposed Project such that entrances and exits are such that trucks are not traversing past the residences located adjacent to the southern and eastern boundaries of the Proposed Project.
- Design the Proposed Project 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 the sensitive receptors (e.g., residences).
- Establish area(s) within the Proposed Project site for repair needs and ensure that these designated areas are away from sensitive receptors (e.g., residences).