



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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135 North D Street
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Mitigated Negative Declaration (MND) for the Proposed Redlands Avenue East Industrial Project (Proposed Project)

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. The following comments recommended revisions to the cumulative impacts during operation and information about South Coast AQMD permits that the Lead Agency should include in the Final MND.

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

Based on the MND, the Lead Agency proposes developing a 254,511-square-foot non-refrigerated warehouse with 31 dock doors on 11.61 acres site.¹ The Proposed Project also includes approximately 0.98 acres for off-site improvements.² The Proposed Project is located east of Redlands Avenue, north of Placentia Avenue, and south of East Rider Street in the City of Perris.³ The Proposed Project is located within the Perris Valley Commerce Center Specific Plan (PVCCSP) planning area of the City of Perris and is designated as a light industrial zone.⁴ Based on the ariel photographs, South Coast AQMD staff found that the nearest sensitive receptor (residence) is adjacent to the south of the Proposed Project. The Proposed Project's construction is anticipated to occur in one phase, beginning in Fall 2022 and last approximately 12 months.⁵ The Proposed Project's operations are anticipated to start in Fall 2023.⁶

South Coast AQMD Staff's Comments on the MND

Cumulative Impacts during Operation

As mentioned in the MND, the Proposed Project site is on six vacant parcels that will be consolidated into one parcel within the Perris Valley Commerce Center Specific Plan (PVCCSP) planning area.⁷ The PVCCSP was adopted by the City of Perris pursuant to a certified

¹ MND. Page 9.

² *Ibid.*

³ *Ibid.* Page 5.

⁴ *Ibid.* Page 8.

⁵ *Ibid.* Page 12.

⁶ *Ibid.*

⁷ *Ibid.* Page 8.

Environmental Impact Report (EIR) on 1/10/2012.⁸ Prior to certification of the PVCCSP, a Draft EIR was released for public review and comment between 7/20/2011 – 9/6/2011.⁹ During this public review period, the South Coast AQMD submitted a comment recommending that the Lead Agency include a more robust analysis of cumulative impacts in the Final EIR. Specifically, the South Coast AQMD asked that the lead agency revisit the estimated number of trucks projected to serve the site, provide additional analysis demonstrating that the project will not significantly impact sensitive receptors during operation and that it will not cause a significant air quality and air toxics impact, and to evaluate additional mitigation measures to further reducing any significant air quality and air toxics impacts. The PVCCSP has been revised and amended many times since 2012, the most recent Perris Valley Commerce Center Specific Plan Amendment No. 12, was approved on January 11, 2022.¹⁰ However, the cumulative impacts from the revised projects in PVCCSP are not updated, and a robust analysis of cumulative air quality and air toxics impacts from all the projects in PVCCSP is not included in the PVCCSP or this MND.

According to the City of Perris webpage under Planning – Environmental Documents for Public Review,¹¹ other development projects are located from 50 to 150 feet west and northwest of the Proposed Project, based on the ariel photographs. These projects are the Initial Study/Mitigated Negative Declaration (IS/MND) for the Redlands Avenue West Industrial Project¹² (prepared in September 2022) and IS/MND for Chartwell Warehouse at Rider Street and Redlands Avenue Project¹³ (prepared in August 2022). Per CEQA Guidelines Section 15065(a)(3), South Coast AQMD staff is primarily concerned with the cumulative air quality impacts from increased concentrations of air toxics in the PVCCSP region. Therefore, South Coast AQMD staff recommends that, at minimum, the Lead Agency perform a qualitative analysis to provide the potential cumulative impacts from air toxics in consideration and listing of all surrounding past, present, and probable future projects. The Lead Agency may also perform a more detailed and robust quantitative analysis of cumulative air toxic and potential health risk implications to be included in the Final MND.

South Coast AQMD Permits and Responsible Agency

If the implementation of the Proposed Project would require the use of new stationary equipment, such as emergency generators, fire pumps, etc., permits from South Coast AQMD are required. The Final MND should include a discussion on stationary equipment requiring South Coast AQMD permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project. Any assumptions used for the stationary sources in the Final MND will also be used as the basis for the permit conditions and limits for the Proposed Project. Please contact South Coast

⁸ ORDINANCE NUMBER 1284.

Accessed at: <https://www.cityofperris.org/home/showpublisheddocument/2923/637250482796800000>

⁹ Perris Valley Commerce Center Specific Plan Final EIR. 9.0 Introduction, Public Review Summary. Page 9.0-1

Accessed at: <https://www.cityofperris.org/home/showpublisheddocument/2645/637455522835370000>

¹⁰ Perris Valley Commerce Center Specific Plan Amendment No. 12, approved January 11, 2022, available at

<https://www.cityofperris.org/home/showpublisheddocument/2647/637799977032200000>

¹¹ City of Perris. Planning – Environmental Documents. Access at: <https://www.cityofperris.org/departments/development-services/planning/environmental-documents-for-public-review>.

¹² Redlands Avenue West Industrial Project. Access at: <https://www.cityofperris.org/departments/development-services/planning/environmental-documents-for-public-review/-folder-338>.

¹³ Chartwell Warehouse at Rider Street and Redlands Avenue Project. Access at:

<https://www.cityofperris.org/departments/development-services/planning/environmental-documents-for-public-review/-folder-322>.

AQMD's Engineering and Permitting staff at (909) 396-3385 for questions on permits. For more general information on permits, please visit South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>.

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.

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

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Planning, Rule Development & Implementation

SW:DN

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