



# South Coast Air Quality Management District

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SENT VIA E-MAIL:

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## **Mitigated Negative Declaration (MND) for the Proposed Redlands Avenue West 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 include recommended revisions, cumulative impact discussion, 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 Proposed Project consists of construction and operation of a 334,040-square-foot building for warehouse activities on a 20.14-acre site that is located on the west side of Redlands Avenue, north of Placentia Avenue and south of East Rider Street in the City of Perris.<sup>1</sup> The Proposed Project is also located within the Perris Valley Commerce Center Specific Plan (PVCCSP) planning area.<sup>2</sup> Construction of the Proposed Project is anticipated to begin in the second quarter of 2022.<sup>3</sup> Operation is expected to begin in 2023.<sup>4</sup> The 330,040-square-foot warehouse portion<sup>5</sup> with 68 loading docks<sup>6</sup> is expected to involve 163 truck trips (round trip) per day<sup>7</sup>. Based on a review of aerial photographs, South Coast AQMD staff found that the nearest sensitive receptor (e.g., residence) is within ~50 feet of the Proposed Project.

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

#### *Health Risk Impacts during Project Operation*

In the Appendix A, "Redlands Avenue West Industrial Project Air Quality, Global Climate Change, Health Risk Assessment and Energy Impact Analysis" by Ganddini Group, August 26, 2021 and its technical modeling files, South Coast AQMD staff found there are more than ten

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<sup>1</sup> Mitigated Negative Declaration. Introduction. Page 1.

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

<sup>3</sup> Appendix A. Redlands Avenue West Industrial Project Air Quality, Global Climate Change, Health Risk Assessment and Energy Impact Analysis. Appendix B CalEEMod Model Daily Emission Printouts, Summer. Page 7.

<sup>4</sup> *Ibid.* Page 1.

<sup>5</sup> Mitigated Negative Declaration. 5.17 Transportation. Page 159.

<sup>6</sup> *Ibid.* Introduction. Page 1

<sup>7</sup> Appendix I. Redlands Avenue West Industrial Project DPR20-00020 Traffic Impact Analysis, 4. Project Trip Forecasts, Table 2. Page 21.

houses located in between the receptor #1 and #2 but they are not included as residential receptors in the model. Given the highest ground level concentration of diesel particulate matters from the dispersion modeling results is expected to occur around receptor #1 and #2 on the west side of Proposed Project Site, it appears that the receptors in the model are not dense enough to capture the maximum pollutant concentrations to estimate the maximum cancer risk values. South Coast AQMD staff recommends that the Lead Agency revise the health risk assessment and dispersion modeling files by adding more residential receptors on the west side of facility.

In addition, it is not clear in the MND if the stationary combustion engines (e.g. diesel firewater pump, diesel emergency generator, and etc.) or off-road combustion mobile source (e.g. diesel forklift) will be used onsite during operation. If any of these will be used when implementing the Proposed Project, they will need to be added as additional sources to the health risk assessment and dispersion modeling files.

#### *South Coast AQMD Permits and Responsible Agency*

If the implementation of the Proposed Project, including more than 334,040 square foot warehouse including 163 daily diesel truck trips (round-trip) with 68 dock doors, would require use of new stationary equipment including but not limited to emergency generators, fire water pumps, and etc., permits from South Coast AQMD are required. The Final MND should include a discussion on those 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 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>.

#### *Cumulative Impacts during Project Operation*

The Proposed Project is located within the Perris Valley Commerce Center Specific Plan (PVCCSP) planning area. The PVCCSP was approved pursuant to a certified Environmental Impact Report (EIR) on 1/10/2012.<sup>8</sup> Prior to certification of the PVCCSP, a Draft EIR was released for public review and comment between 7/20/2011 – 9/6/2011.<sup>9</sup> During this public review period the South Coast AQMD submitted a comment recommending 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 reduce 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

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<sup>8</sup> ORDINANCE NUMBER 1284.

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

<sup>9</sup> Final EIR. 9.0 Introduction, Public Review Summary. Page 9.0-1

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

approved on January 11, 2022<sup>10</sup>. 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.

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 to perform a qualitative analysis to provide the potential cumulative impacts from air toxics in consideration and listing of all surrounding past, present, and future probable projects. The Lead Agency may also perform a more detailed and robust quantitative analysis of cumulative air toxics and potential health risk implications to include in the Final MND.

### 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 Evelyn Aguilar, Air Quality Specialist, at [eaguilar@aqmd.gov](mailto:eaguilar@aqmd.gov), should you have any questions or wish to discuss the comments.

Sincerely,

*Sam Wang*

Sam Wang

Program Supervisor, CEQA-IGR

Planning, Rule Development and Implementation

SW:EA  
RVC221108-02  
Control Number

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<sup>10</sup> Perris Valley Commerce Center Specific Plan Amendment No. 12, approved January 11, 2022, available at <https://www.cityofperris.org/home/showpublisheddocument/2647/637799977032200000>