



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:

[algarcia@cityofperris.org](mailto:algarcia@cityofperris.org)

Alfredo Garcia, Associate Planner

Department of Development Services–Planning Division

135 North D Street

Perris, California 92570

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## **Mitigated Negative Declaration (MND) for the Proposed Ramona Expressway and Brennan Avenue Warehouse 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 to the health risk impacts during operation, 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 Proposed Project consists of construction and operation of a 165,371-square-foot building for warehouse activities on a 7.5-acre site that is located near the southwest corner of Ramona Expressway and Brennan Avenue 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 fourth quarter of 2022.<sup>3</sup> Operation is expected to begin in 2023.<sup>4</sup> The 160,371-square-foot warehouse portion<sup>5</sup> with 22 loading docks<sup>6</sup> is expected to involve 102 truck trips 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 ~470 feet of the Proposed Project.

### South Coast AQMD Staff's Comments

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

In the Appendix A, “Air Quality, Greenhouse Gas Emissions, and Energy Analysis” by First Carbon Solutions, Revised October 12, 2022 of this MND and its technical modeling files, South Coast AQMD staff found several places that need to be revised and re-modeled in accordance with the requirements in Office of Environmental Health Hazard Assessment (OEHHA) - Air

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<sup>1</sup> Mitigated Negative Declaration. Introduction. Page 1-3.

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

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

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

<sup>5</sup> *Ibid.* Page 3

<sup>6</sup> *Ibid.* 2.3 Air Quality. Page 52.

<sup>7</sup> Appendix I. Traffic Supporting information, I.1 Trip Generation Assessment, Table 2. Page 3 of 5.

Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments<sup>8</sup>. For example, the diesel particulate matters (DPM) emissions from truck idling and proposed 100 hp firewater pump were not estimated and modeled as point sources in MND's dispersion modeling files. The averaging time selected for the DPM modeling should use "period" but not "annual" in AERMOD settings. The proposed 165,371-square-foot warehouse building was not included in the dispersion model and therefore building downwash effect was not included. The cancer risks for off-site worker were not estimated in MND. In addition, it is not clear in the MND if any off-road combustion mobile source (e.g. diesel forklift) will be used onsite during operation. If any of them will be used when implementing the Proposed Project, they will also need to be added as additional sources to the health risk assessment and dispersion modeling files. Therefore, South Coast AQMD staff recommends that the Lead Agency revise the health risk assessment and dispersion modeling files and include the revisions in the Final MND.

### *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>9</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>10</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 approved on January 11, 2022<sup>11</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 be included in the Final MND.

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<sup>8</sup> Office of Environmental Health Hazard Assessment (OEHHA) - Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments. Available at <https://oehha.ca.gov/air/crn/notice-adoption-air-toxics-hot-spots-program-guidance-manual-preparation-health-risk-0>

<sup>9</sup> ORDINANCE NUMBER 1284.

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

<sup>10</sup> Final EIR. 9.0 Introduction, Public Review Summary. Page 9.0-1

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

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

*South Coast AQMD Permits and Responsible Agency*

If implementation of the Proposed Project would require the use of stationary equipment, including but not limited to emergency fire pump(s),<sup>12</sup> permits from South Coast AQMD are required. The Final MND should include a discussion on stationary equipment that will require South Coast AQMD permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project. Any assumptions used in the Final MND will be used as the basis for permit conditions and limits for the Proposed Project. The 2015 revised Office of Environmental Health Hazard Assessment (OEHHA) methodology is being used by South Coast AQMD for determining operational health risks for permitting applications and also for all CEQA projects where South Coast AQMD is the Lead Agency. 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>.

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  
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<sup>12</sup> Mitigated Negative Declaration. 2.3 Air Quality, Table 2. Page 45.