



# South Coast Air Quality Management District

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FAXED: AUGUST 19, 2005

August 19, 2005

Ms. Olivia Barnes  
Department of Community Development  
City of Perris  
135 North "D" Street  
Perris, CA 92570-1998

Dear Ms. Barnes:

**Final Environmental Impact Report (FEIR) for the  
Perris Warehouse/Distribution Facility Project, Volume III  
Response to Comments**

On July 13, 2005, the SCAQMD staff submitted comments on the Draft Environmental Impact Report for the Perris Warehouse/Distribution Facility. SCAQMD staff has received the responses to comments on the DEIR. SCAQMD staff is concerned that idling assumptions used for the Health Risk Assessment may significantly underestimate the cancer risk associated with truck idling. SCAQMD staff strongly recommends that the lead agency revise the Health Risk Assessment to reflect a more reasonable idling time that is representative of reasonable worst-case assumptions.

Please call me at (909) 396-3105 if you have any questions regarding these comments.

Sincerely,

Susan Nakamura  
Planning and Rules Manager  
Planning, Rule Development & Area sources

Attachment

SN:CB

**Final Environmental Impact Report (FEIR) for the  
Perris Warehouse/Distribution Facility Project, Volume III  
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**Response to Response to Comment 5-15**

SCAQMD staff believes that the 1.5 minutes of idling time per truck trip is an unreasonable assumption that underestimates risk by at least an order of magnitude. The project proponent cannot take credit for reductions from legislation that may be adopted in the future. Currently, under state law trucks are limited to five minutes of idling at any one time. It is reasonable to assume that trucks would be idling for a total of ten minutes at a warehouse distribution center (check-in, loading/unloading, check-out, etc.). If the project proponent desires to use the 1.5 minutes of idling per truck trip, the 1.5 minutes of idling per truck trip should be included as part of the proposed project and placed as a restriction in the CUP. Otherwise, the HRA in the Final EIR should be completed with at least 10-minute per trip idling time.

**Response to Response to Comment 5-13**

Emissions factors for HRA are typically either developed for the opening year fleet or an average of fleet average emission factors from the opening year to 70 years after opening year. While the project proponent may disagree with how EMFAC2002 was developed, EMFAC2002 is the standard for on-road mobile emissions and has been approved by EPA and CARB. The methodology proposed by the project proponent underestimates mobile on-road emissions. Therefore, the Final EIR should include emission factors developed either for the opening year fleet or an average of fleet average emission factors from the opening year to 70 years after opening year.

**Response to Response to Comment 5-10**

The project proponent's methodology of excluding receptors at roadway edge because individuals are not expected to remain on the sidewalk for one- to eight- hour periods is not consistent with Federal or State modeling guidance on receptor siting. The BAAQMD Simplified Methodology was developed using CALINE4. Since the Simplified Methodology is based on CALINE4, receptor siting should follow the CALINE4 methodology, which is presented in the Caltrans Transportation Project-Level Carbon Monoxide Protocol (CO Protocol), Revised December 1997. The CO Protocol can be downloaded from the Caltrans website at <http://www.dot.ca.gov/hq/env/air/coprot.htm>. The CO Protocol states that receptors should be placed on sidewalks, which would be at the edge receptor in the BAAQMD Simplified CO Hotspots Methodology. Final EIR should include a CO hotspots analysis with receptors placed at the edge of the roadway.