



# South Coast Air Quality Management District

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**FAXED: DECEMBER 20, 2006**

December 20, 2006

Mr. Brad Eckhardt  
City of Perris  
Planning Department  
135 North "D" Street  
Perris, CA 92570-2200

Dear Mr. Eckhardt:

**Draft Environmental Impact Report (DEIR) for the  
Perris Marketplace (November 2006)**

The South Coast Air Quality Management District (SCAQMD) 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 in the Final Environmental Impact Report.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Environmental Impact Report. The SCAQMD would be available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Charles Blankson, Ph.D., Air Quality Specialist – CEQA Section, at (909) 396-3304 if you have any questions regarding these comments.

Sincerely

Steve Smith, Ph.D.  
Program Supervisor, CEQA Section  
Planning, Rule Development & Area Sources

Attachment

SS: CB

RVC061115-03  
Control Number

## **Draft Environmental Impact Report (DEIR) for the Perris Marketplace (November 2006)**

### **Localized Air Quality Impacts**

Consistent with the SCAQMD's environmental justice program and policies, the SCAQMD recommends that the lead agency evaluate localized air quality impacts of the proposed project. SCAQMD staff recommends that for this project and for future projects, the lead agency undertake the localized analysis for both construction and operation to ensure that all necessary and feasible mitigation measures are implemented to protect the health of existing or potential sensitive receptors close to the proposed project. Given the proximity of the proposed project to residences located to the east of Perris Boulevard, the medical facilities located to the northeast of the project site and Perris Head Start and Perris High School located within 1,400 feet of the project site, this requirement is pertinent. The methodology for conducting the localized significance thresholds analysis can be found on the SCAQMD website at:

[www.aqmd.gov/ceqa/handbook/LST/LST.html](http://www.aqmd.gov/ceqa/handbook/LST/LST.html)

### **Truck Idling Emissions**

The lead agency states on page 4.3-18 of the DEIR that "the trucks do not produce any emissions while at the docks, except when arriving or leaving." Although the mobile source HRA includes the assumption that haul trucks will idle 1.5 minutes per trip, given the circumstance of loading and unloading merchandise, the SCAQMD recommends using an idling time of at least 10 minutes per truck trip. Once operational, the lead agency should ensure that trucks do not idle longer than five minutes in compliance with State law by posting signs, etc.

### **Health Risk Assessment**

- Emission factors should be based on fleet year. Using the 2040 engine year emission factors for fleets after 2040 is not correct. EMFAC2002 uses a 40 plus year fleet, therefore, even by 2076, the mixed fleet would not be fully comprised of vehicles with 2040 model years. To be conservative, the 2040 fleet year emission factors should be used to represent all fleet years from 2040 and beyond. The Final EIR should include printouts of the EMFAC2002 emission factors used to estimate diesel emissions and detail how the emission factors are weighted. The detail should show the equation used and identify the emission factors.
- On the third page of Appendix E in the paragraph under Table E-2, the lead agency states that "since no specifics on truck movement on site were available, for the purpose of this analysis all diesel truck exhaust was modeled as if it came from a single spot located near the center of the site. This technique was used because it is not known how the trucks will travel on the project site and because it generates health risk values that are more conservative (higher) than the reality of spreading the truck

emissions over the site.” While the statement that representing mobile sources as a point source is more conservative than spreading the mobile source emissions over the entire site is true, it is not appropriate to spread mobile source emissions over the entire site. There are two source-related concepts that need to be addressed when air dispersion modeling emissions, source treatment (how emissions are represented) and spatial treatment (where emissions are represented).

As far as source treatment, representing mobile sources as a single point source is conservative. However, placing the source at the center of the facility may not generate representative health risk values. The source should be placed where the emissions would occur (i.e., near buildings, especially loading docks). Since the location is not known according to the Draft EIR, the source should be placed at a worst-case location (i.e., near the property line).

- The health risk assessment should include a map that shows sensitive receptors. A review of a satellite map shows that residential property is located directly across Perris Boulevard from the proposed project site.

The following sensitive receptors were not included in the Draft EIR.

- Valley Plaza Doctors Hospital (hospital), 2224 Medical Center Drive, Perris
- Vista Specialty Hospital of Riverside (hospital), 2224 Medical Center Drive, Perris
- Ember Care Health Center (convalescent care), 2225 Perris Blvd., Perris
- Medical Arts Convalescent Hospital (convalescent care), 2225 N Perris Blvd, Perris
- Renu Hope Foundation (daycare), 1675 N Perris Blvd # H, Perris

A search for all sensitive receptors should be completed and included in the health risk assessment and Final EIR. Health risk values should be reported for these sensitive receptors.

### **Reducing Operational Emissions**

According to Table 4.3.K on page 4.3-26 of the DEIR, the proposed project’s operational emissions would be significant for CO, VOC, NO<sub>x</sub> and PM<sub>10</sub>. After proposing that the project proponent implement Transportation Demand Management measures which are incorporated into the design of the proposed project to promote ridesharing and reduce vehicle miles traveled, the lead agency states that “No other feasible mitigation measures have been identified to reduce the operational emissions of CO, VOC, NO<sub>x</sub> and PM<sub>10</sub> to less than significant level.” SCAQMD staff recommends the following additional measures to be incorporated into the design of the proposed project which may also help reduce operational emissions:

- Install central water heating systems to reduce energy consumption.
- Install energy efficient appliances, such as water heaters, cooking equipment, refrigerators, furnaces and boiler units.
- Use light-colored roofing materials to deflect heat.

- Provide shade trees adjacent to commercial buildings to reduce building heating/cooling needs.
- Install solar panels on roofs to supply electricity for air conditioning.
- Synchronize traffic lights on streets impacted by project development.
- Use double-paned windows to reduce thermal loss.