



South Coast Air Quality Management District

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Ms. Sabrina Chavez, Project Planner
City of Perris
Department of Developmental Services/ Planning Division
135 "D" Street
Perris, CA 92570-2200

**Case Transmittal for TPM 06-0227 and DPR 06-0228 for the Subdivision of 4-
Vacant Lots and the Construction of 44-Total Industrial Warehouse Buildings on
9.15 acres**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. Based on the size and nature of the proposed project and the proximity to the residential neighborhood, the SCAQMD believes that the project warrants undergoing an environmental analysis pursuant to the California Air Quality Act. Specifically, the environmental analysis should include quantification of the air emissions from the construction and operation of the proposed project and a health risk assessment to quantify the potential cancer risk from the diesel truck traffic associated with the proposed project. The following paragraphs include recommendations on the methodologies to be used for the air quality and health risk assessment analyses for the proposed project.

Please provide the SCAQMD staff with a copy of the CEQA document for the proposed project when it is completed. The SCAQMD staff would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist, CEQA Section, at (909) 396-3302 if you have any questions regarding these comments.

Sincerely,

Susan Nakamura
Planning & Rules Manager
Planning, Rule Development & Area Sources

Attachment
SN:GM

RVC060602-03
Control Number

Air Quality Analysis

The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. Alternatively, the lead agency may wish to consider using the California Air Resources Board (CARB) approved URBEMIS 2002 Model. This model can be accessed at <http://www.aqmd.gov/ceqa/models.html>.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project. Air quality impacts from both construction and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the analysis.

Mitigation Measures

In the event that the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures be utilized during project construction and operation to minimize or eliminate significant adverse air quality impacts. To assist the Lead Agency with identifying possible mitigation measures for the project, please refer to Chapter 11 of the SCAQMD CEQA Air Quality Handbook for sample air quality mitigation measures. Additionally, SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook contain numerous measures for controlling construction-related emissions that should be considered for use as CEQA mitigation if not otherwise required. Pursuant to state CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed.

Cancer Risk Assessment

Since the California Air Resources Board has designated diesel particulate emissions as a toxic air contaminant and the proposed industrial warehouse project includes potential emissions from diesel trucks idling and queuing, the lead agency should evaluate the associated cancer risks from the diesel particulate emissions at the proposed project.

The SCAQMD has developed a methodology for estimating cancer risks from mobile sources in a document entitled Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions. This document can be used to perform a health risk assessment based on the characteristics currently known for the project. It is, therefore, recommended that the lead agency perform a mobile source health risk assessment for the proposed project, which includes the results in the Final EIR. This document can be downloaded from AQMD's CEQA web pages at the following URL: http://www.aqmd.gov/ceqa/handbook/diesel_analysis.doc .

The HRA Guidance document also contains a list of mitigation measures that are specifically recommended to be used to mitigate diesel exhaust emissions, if applicable and feasible:

Potential Mitigation Measures from the SCAQMD Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions

Truck Idling Facilities

- Provide a minimum buffer zone of 300 meters between truck traffic and sensitive receptors;
- Re-route truck traffic by adding direct off-ramps for the truck traffic or by restricting truck traffic on certain sensitive routes;
- Improve traffic flow by signal synchronization;
- Enforce truck parking restrictions;
- Develop park and ride programs;
- Restrict truck idling;
- Restrict operation to "clean" trucks;
- Provide electrical hook-ups for trucks that need to cool their load;
- Electrify auxiliary power units;
- Use "clean" street sweepers;
- Pave roads and road shoulders;
- Provide onsite services to minimize truck traffic in or near residential areas, including, but not limited to, the following services: meal or cafeteria service, automated teller machines, etc.
- Require or provide incentives to use low-sulfur diesel fuel with particulate traps; and
- Conduct air quality monitoring at sensitive receptors.

In addition, a copy of the Western Riverside Council of Governments (WRCOG) "Good Neighbor Guidelines for Siting New and/or Modified Warehouse/Distribution Facilities" will be sent to you directly from WRCOG. The Guidelines were developed through the WRCOG's Regional Air Quality Task Force. The objective of the Guidelines is to provide local governments and developers with a menu of options of strategies that can reduce exposure to diesel particulate from new and/or modified warehouse or distribution centers. The Guidelines include 7 goals, and a variety of strategies for each goal that can be implemented in whole or part. There are a variety of benefits associated with adopting the guidelines, such as reducing the exposure of residents and sensitive receptors to diesel emissions. Any questions pertaining to the Guidelines can be directed to WRCOG at (951) 955-7985.

Data Sources

SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the SCAQMD's World Wide Web Homepage (<http://www.aqmd.gov>).