



**South Coast
Air Quality Management District**
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SENT VIA E-MAIL AND USPS:
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Mr. Kenneth Phung, Project Planner
City of Perris, Planning Division
135 North "D" Street
Perris, CA 92570

**Draft Environmental Impact Report (DEIR) for the
Optimus Logistics Center 2**

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 into the Final CEQA document.

In the project description, the lead agency proposes the construction of two buildings for warehouse distribution and office space uses totaling approximately 1,037,811 square feet on a 48.4 acre site. The lead agency has projected 1,744 total daily vehicle trips including at least 357 daily truck trips operating at the site. In the Air Quality Section, the lead agency quantified the project's construction and operation air quality impacts and has compared those impacts with the SCAQMD's recommended regional and localized daily significance thresholds. Based on its analyses, the Lead Agency has determined that operational air quality impacts will exceed the recommended regional daily significance threshold for NO_x.

The SCAQMD staff has concerns regarding the assumptions used in the air quality analysis, specifically the operational portion of the CalEEMod land use model. Since the proposed project will result in significant NO_x impacts, all feasible mitigation measures should be included in the Final CEQA document to further reduce the significant impacts. Details are included in the attachment.

Pursuant to Public Resources Code Section 21092.5, SCAQMD staff requests that the lead agency provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Jack Cheng, Air Quality Specialist, at (909) 396-2448, if you have any questions regarding the enclosed comments.

Sincerely,

Jillian Wong

Jillian Wong, Ph.D.
Program Supervisor
Planning, Rule Development & Area Sources

Attachment
JW:JC
RVC150729-02
Control Number

Siting of an Incompatible Land Use

1. Based on information in the DEIR (air quality analyses, the project truck distribution, and by aerial map inspection), the lead agency shows a minimum distance of 15 meters to the nearest sensitive receptor; a residence located southeast of the project site. The SCAQMD staff is concerned that the existing sensitive receptors will be exposed to significant regional and localized operational impacts, mostly from the daily truck activities that will likely operate using diesel fuel.

As a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land-use decision making process, the California Air Resources Board (CARB) has provided the CARB Air Quality and Land Use Handbook (CARB Land Use Handbook). Based on guidance from the CARB Land Use Handbook, CARB recommends a buffer of at least 1,000 feet between land uses that will have 100 or more trucks per day.¹

In accordance with the state CEQA Guidelines §15126.4 (a)(1)(D), the lead agency should discuss the proposed siting of this land use and any potential impacts resulting from any proposed mitigation related to the CARB Land Use Handbook guidance in the Final EIR.

Air Quality Analysis

Daily Truck Trip Rate

2. In the Air Quality Impact Analysis, the Lead Agency uses the Institute of Transportation Engineers Trip Generation Manual, 9th Edition, 2012 (ITE Manual) 1.68 overall trip generation rate (for cars and trucks totaling approximately 1,744 daily vehicles) for the proposed Project, but does not use the 0.64 (38.1%) daily truck trip rate from this same reference. Rather, the air quality analysis used a 0.343 daily truck trip rate (ITE 1.68 total daily trip rate minus 1.337 passenger vehicle trip rate = 0.343 (20.43%) daily truck trip rate) and truck vehicle fleet mixture percentages from the City of Fontana Truck Trip Generation Study (Fontana Study) to estimate project air quality operational impacts in the CalEEMod modeling. By using the 0.343 Fontana Study daily truck trip rate, trucks are estimated at 357 daily truck trips in the DEIR instead of approximately 664 daily truck trips using the ITE 0.64 daily truck trip rate.

Specifically, the Fontana Study fleet mixture percentages include: 3.46 percent of the total fleet for 2-axle Trucks; 4.64 percent for 3-axle trucks; and 12.33 percent for 4-axle and larger trucks with truck categories totaling 20.43 percent of the total vehicle fleet. Passenger Vehicles would therefore comprise 79.57 percent of total vehicles during operations. However, the 0.343 daily truck trip rate resulted in fleet percentages for the CalEEMod truck subcategories that were not proportionally adjusted consistent with the percentage of trucks estimated using the ITE 0.64 daily truck trip rate. In order to avoid underestimating project operational and related air quality and health effect impacts, the Air Quality Analysis, HRA and Final EIR should be revised using the following truck percentages: LHD2 = 0.0645, MHD = 0.0865, HHD = 0.2300.

Absent from a specific traffic study of known tenants, the Final EIR should be consistent using the associated ITE truck trip rate to estimate project daily truck trips so that project trips and associated emission and health effect impacts are not underestimated.

¹ CARB Air Quality and Land Use Handbook: <http://www.arb.ca.gov/ch/handbook.pdf>

On-Road Truck Trip Length

3. In the CalEEMod output sheets provided in Appendix E of the DEIR appendices, the modeling used a 60 mile one-way trip distance and a 20% trip percentage for trucks moving goods for perspective tenants (C-W) and a 6.9 one-way trip distance and an 80% trip percentage for trucks supporting the operation of the perspective tenants (C-NW). In electronic file “LOG 2 4.03 Air Quality – 7-15 Table 4.3-E Operational Vehicle Trip Assumption”, the table indicates a 16.6 mile one-way trip distance and an 80% trip percentage for trucks moving goods for perspective tenants (C-W) and a 60 mile one-way trip distance and a 20% trip percentage for trucks supporting the operation of the perspective tenants (C-NW). The Air Quality Analysis is inconsistent and under estimates air quality impacts. A 60 mile one-way trip distance and 80% trip percentage should be used to model trucks moving goods for the perspective tenants (C-W) and a 6.9 – 16.6 one-way trip distance and 20 % trip percentage should be used by trucks supporting the operations of the proposed facility(C-NW).

On page 3.0-8 in the project description, the lead agency describes potential truck activities that involve the proposed warehouse trucks. “Goods imported from the Ports of Long Beach and Los Angeles as well as other locations will be delivered via truck to the proposed distribution centers and distributed via truck to both in- and out-of-state locations.” Since the port areas are over 70 miles away from the project site and that trucks will be serving other destinations within the basin and out of state, the SCAQMD staff recommends, absent a tenant-specific analysis with trip length information, that all applicable analyses be revised in the Final EIR using a one-way trip length that more accurately estimates air quality emission and related impacts based on the anticipated activities and distances described in the DEIR.

Use of an Un-Refrigerated Warehouse Land Use CalEEMod Model Input

4. Based on a review of the project’s emissions calculations in Appendix E – RK Revised AQ, GHG, HRA: Air Quality Analysis² (CalEEMod Output Sheets), the lead agency determined the proposed Project’s air quality impacts using emission factors for unrefrigerated warehouses/truck activity. However, in mitigation measure MM Air-12 to reduce operational emissions, the lead agency refers to the use of Transportation Refrigeration Units (TRUs) at the project site. The SCAQMD staff therefore recommends that the lead agency include a mitigation measure that precludes the use of refrigerated warehousing at the Project site or revise the air quality analysis to account for emissions from refrigerated warehouse uses. Further, if the lead agency chooses to include refrigerated warehouses in the air quality analysis then MM Air-12 should be incorporated into the project and remain in the Final EIR.

LST and Health Risk Assessment (HRA) Modeling

5. The lead agency used AERMOD (version 12345) to prepare the dispersion modeling for the HRA even though AERMOD (version 14134) was available for at the time of analysis (10/20/2014). Therefore, SCAQMD staff recommends using AERMOD (version 15181), the most recent available version, to revise the dispersion modeling for this project.
6. The HRA analysis involved the use of separate discrete receptors placed randomly for the sensitive receptors. SCAQMD staff recommends that the lead agency revise the HRA using a receptor grid over the existing residences and areas zoned or planned for residential development, in order to ensure that the maximum impacts to a residential receptor are properly analyzed.

² Appendix A: CalEEMod Emissions Model Output.

7. SLINE1, SLINE2, and SLINE3 onsite travel line volume sources do not span the entire docking area. SCAQMD staff recommends that the lead agency revise the HRA using a series of volume sources that spans the entire docking area to ensure that impacts are properly analyzed.
8. STCK1, STCK2, and STCK3 onsite idling point sources should span the entire docking area. SCAQMD staff recommends that the lead agency revise the HRA using a line volume that spans the entire docking area to ensure that impacts are properly analyzed.
9. Based on the site plan in the project description, there are two driveways that access Webster Street where residences are located across from the proposed project site. Traffic exiting the site from Webster Street can then access Ramona Expressway to get on the freeway. Although the project description in the Notice of Availability, the site plan and the computer modeling show truck traffic using only Patterson Avenue north towards Harvey Knox Boulevard to access the 215 Freeway, there is nothing, however, to preclude trucks from using the driveways on Webster Street, passing by existing residences and then accessing Ramona Expressway to get on the freeway. The SCAQMD staff recommends that the Final EIR include a discussion of how the project will stop trucks from using Webster Avenue or include a restriction that would formally restrict Webster Street to passenger vehicles only. If trucks are not formally restricted, then project impacts from truck movement on Webster Street and beyond (i.e., north on Webster Street, or south to Ramona Expressway to access the 215 Freeway) would have been underestimated in the DEIR. These potential impacts should therefore be analyzed in the HRA and included in the Final EIR.

Mitigation Measures for Operational Air Quality Impacts (Mobile Sources)

10. Because the California Air Resources Board has classified the particulate portion of diesel exhaust emissions as carcinogenic and during project operations, the lead agency has determined that project operation emissions are significant for Oxides of Nitrogen (NOx), primarily from truck activity emissions, the SCAQMD staff therefore recommends the following changes and additional measures that should be incorporated in the Final EIR to reduce exposure to sensitive receptors and reduce potential significant project air quality impacts:

Recommended Changes

MM AQ 4.3H

- Prior to issuance of a building permit, the Project proponent shall provide the City with project specifications, drawings, and calculations that demonstrate that main electrical supply lines and panels have been sized to support heavy truck charging facilities. ~~when these trucks become available. The calculations shall be based on reasonable predictions from currently available truck manufacturer's data. Electrical system upgrades that exceed reasonable costs shall not be required. In addition, the Project will incorporate 2 electric vehicle charging stations for light-duty vehicles.~~ Electrical lines shall be designed and sized to add additional charging stations when a demand is demonstrated. Similar to the City of Los Angeles requirements for all new projects, the SCAQMD staff recommends that the Lead Agency require at least 5% of all vehicle parking spaces (including for trucks) include EV charging stations.³ Further, electrical hookups should be provided at the onsite truck stop for truckers to plug in any onboard auxiliary equipment. At a minimum, electrical panels should appropriately sized to allow for future expanded use.

³ http://ladbs.org/LADBSWeb/LADBS_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf

Additional Mitigation Measures

- Require the use of 2010 compliant diesel trucks, or alternatively fueled, delivery trucks (e.g., food, retail and vendor supply delivery trucks) at commercial/retail sites upon project build-out. If this isn't feasible, consider other measures such as incentives, phase-in schedules for clean trucks, etc.
- Provide minimum buffer zone of 300 meters (approximately 1,000 feet) between truck traffic and sensitive receptors.
- Limit the daily number of trucks allowed at each facility to levels analyzed in the Final EIR. If higher daily truck volumes are anticipated to visit the site, the lead agency should commit to re-evaluating the project through CEQA prior to allowing this higher activity level.
- Design the site such that any check-in point for trucks is well inside the facility to ensure that there are no trucks queuing outside of the facility.
- On-site equipment should be alternative fueled.
- Provide food options, fueling, truck repair and or convenience stores on-site to minimize the need for trucks to traverse through residential neighborhoods.
- Improve traffic flow by signal synchronization.
- Have truck routes clearly marked with trailblazer signs, so that trucks will not enter residential areas.
- Should the proposed Project generate significant regional emissions, the lead agency should require mitigation that requires accelerated phase-in for non-diesel powered trucks. For example, natural gas trucks, including Class 8 HHD trucks, are commercially available today. Natural gas trucks can provide a substantial reduction in health risks, and may be more financially feasible today due to reduced fuel costs compared to diesel. In the Final CEQA document, the lead agency should require a phase-in schedule for these cleaner operating trucks to reduce project impacts. SCAQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the lead agency and project applicant.

Mitigation Measures for Operational Air Quality Impacts (Other)

11. In addition to the mobile source mitigation measures identified above the Lead Agency should incorporate the following on-site area source mitigation measures below to reduce the project's regional air quality impacts from NOx emissions during operation. These mitigation measure should be incorporated pursuant to CEQA Guidelines §15126.4, §15369.5.

- Maximize use of solar energy including solar panels; installing the maximum possible number of solar energy arrays on the building roofs and/or on the Project site to generate solar energy for the facility.
- Utilize only Energy Star heating, cooling, and lighting devices, and appliances.
- Install light colored "cool" roofs and cool pavements.
- Limit the use of outdoor lighting to only that needed for safety and security purposes.
- Require use of electric or alternatively fueled sweepers with HEPA filters.
- Use of water-based or low VOC cleaning products.