



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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**Draft Environmental Impact Report (Draft EIR) for the Proposed
Ramona Gateway Project (Proposed Project)
(SCH Number.: 2022040023)**

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 recommended revisions to the cumulative impacts during operation, CEQA localized air quality analysis for construction and operation, health risk assessment during operation, California Emissions Estimator Model (CalEEMod) fleet mix and information about South Coast AQMD permits that the Lead Agency should include in the Final EIR.

South Coast AQMD Staff's Summary of Project Information in the Draft EIR

Based on the Draft EIR, the Lead Agency proposes to develop eight retail buildings total 37,215 square feet, on 6.95 acres site within the northern portion of the Proposed Project site.¹ The Proposed Project assumes that retail buildings consist of three drive-thru restaurants, two multi-tenant buildings (one with a drive-thru), one coffee shop with a drive-thru, one convenience store with a gas station with annual throughput of 1,200,000 gallons, and one drive-thru express carwash facility.² In addition, the Lead Agency proposes to develop a 950,224-square-foot industrial warehouse building on 42.22 acres within the southern portion of the Proposed Project site.³ It is assumed that the warehouse will have high-cube cold storage use, which is 5% of the building space.⁴ The Proposed Project is located within the Perris Valley Commerce Center Specific Plan (PVCCSP) planning area of the City of Perris.⁵ The Proposed Project is situated south of Ramona Expressway, west of Webster Avenue, east of Nevada Avenue, and north of Val Verde Academy, Val Verde High School, and the Val Verde Regional Learning Center.⁶ The Proposed Project's construction is anticipated to occur over an approximately 12-month period, with the construction of retail and warehouse buildings occurring concurrently.⁷

¹ Draft EIR. Page 1-3.

² *Ibid.*

³ *Ibid.*

⁴ *Ibid.*

⁵ *Ibid.* Page 1-1.

⁶ *Ibid.* Page 3-1.

⁷ *Ibid.* Page 1-4.

Based on the ariel photographs, South Coast AQMD staff found that the nearest sensitive receptor (residence) is approximately 485 feet northeast of the Proposed Project's northeast corner, and the nearest school is adjacent to the south of the Proposed Project.

South Coast AQMD Staff's Comments on the Draft EIR

Cumulative Impacts during Operation

As mentioned in the Draft EIR, the Proposed Project is located within the Perris Valley Commerce Center Specific Plan (PVCCSP) planning area.⁸ The PVCCSP was adopted by the City of Perris pursuant to a certified Environmental Impact Report (EIR) on 1/10/2012.⁹ Prior to certification of the PVCCSP, a Draft EIR was released for public review and comment between 7/20/2011 – 9/6/2011.¹⁰ During this public review period, the South Coast AQMD submitted a comment recommending that 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 reducing 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, 2022.¹¹ However, the cumulative impacts from the revised projects in PVCCSP are not updated, and robust analysis of cumulative air quality and air toxics impacts from all the projects in PVCCSP is not included in the PVCCSP or this EIR.

According to the City of Perris webpage under Planning – Environmental Documents for Public Review,¹² other development projects are located from 750 feet to 1 mile from the Proposed Project, based on the ariel photographs. These projects are Ramona Expressway and Brennan Avenue Warehouse Project (the Draft Initial Study/Mitigated Negative Declaration (IS/MND) was revised on October 13, 2022), Ramona-Indian Warehouse Project (the Draft IS/MND was prepared on November 2022), and OLC3 Ramona Expressway and Perris Boulevard Commercial Warehouse Project (Notice of Preparation of a Draft EIR was released on July 8, 2022). 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 perform a qualitative analysis to provide the potential cumulative impacts from air toxics in consideration and listing of all surrounding past, present, and probable future projects. The Lead Agency may also perform a more detailed and robust quantitative analysis of cumulative air toxic and potential health risk implications to be included in the Final EIR.

⁸ *Ibid.* Page 1-1.

⁹ ORDINANCE NUMBER 1284.

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

¹⁰ Perris Valley Commerce Center Specific Plan Final EIR. 9.0 Introduction, Public Review Summary. Page 9.0-1

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

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

¹² City of Perris. Planning – Environmental Documents. Access at: <https://www.cityofperris.org/departments/development-services/planning/environmental-documents-for-public-review>.

Health Risk Assessment (HRA) during Operation

In the Draft EIR Air Quality Section, the Lead Agency utilizes AERMOD/HARP dispersion model to analyze the health risks from the Proposed Project.¹³ Based on the South Coast AQMD staff's review, the warehouse building is not included in the building downwash option of the modeling during operation. The ground-level pollutant concentrations near the building would be underestimated if the downwash effects were absent in the dispersion modeling. Therefore, building downwash should be considered for the Proposed Project operation in order to predict more accurate ground-level concentrations. In addition, based on the project description in the Draft EIR, the warehouse is expected to use 5% of the building floor area for cold storage; hence, the 36 truck round trips with Transport Refrigeration Units (TRUs) are anticipated to be used during the project operation.¹⁴ TRUs emissions would need to be estimated separately and included in the dispersion modeling analysis and HRA. However, the HRA modeling file does not indicate the TRUs sources included in the emissions sources.

The Lead Agency also discusses the Project-Level Mitigation Measures (MM) in the Draft EIR, and MM 3-5 requires using electric-powered service yard trucks (hostlers), pallet jacks and forklifts, and other on-site equipment, if technically feasible.¹⁵ However, if the on-site off-road equipment uses fossil fuels (e.g., diesel) combustion engines, the Lead Agency should include the equipment in the HRA modeling during operation as point or volume sources. Furthermore, if the Proposed Project includes any stationary sources (e.g., internal combustion engines) during operation, they should also need to be included in the modeling as point sources.

Therefore, South Coast AQMD staff suggests that the Lead Agency revise the operational HRA modeling by incorporating the above recommendations and including the HRA results in the Final EIR. If the HRA modeling is not revised and included in the Final EIR, the Lead Agency should provide reasons supported by substantial evidence in the record to explain why a new air quality mitigation measure is not included.

CEQA Localized Air Quality Analysis for Construction and Operation

In the Draft EIR Air Quality Section, the Lead Agency discusses the localized significance thresholds (LSTs) from the Proposed Project construction and operation. The Lead Agency uses a 25-meter receptor distance to evaluate NO_x and CO due to the school's boundary being closer than 25 meters to the Proposed Project site.¹⁶ While a 25-meter receptor distance is used for NO_x and CO, the Lead Agency uses a 108-meter receptor distance to evaluate PM₁₀ and PM_{2.5} due to the nearest receptor being approximately 108 meters northeast of the Proposed Project site.¹⁷ However, South Coast AQMD staff compared the LSTs in the Draft EIR to the South Coast AQMD Mass Rate LST Lookup Table¹⁸ and found that the LST for CO was used at a 100-meter receptor distance. Due to the inconsistency of the LSTs in the Draft EIR, South Coast AQMD staff

¹³ *Ibid.* Page 4.3-20

¹⁴ *Ibid.* Page 4.3-34.

¹⁵ *Ibid.* Page 4.3-38.

¹⁶ *Ibid.* Page 4.3-41.

¹⁷ *Ibid.*

¹⁸ South Coast AQMD Mass Rate LST Lookup Table. Access at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

recommends that the Lead Agency revise the LSTs discussions using the same and the most conservative receptor distance for the localized air quality analysis for construction and operation, re-determine the significant impacts, and include them in the Final EIR. In addition, same as the comment in HRA during project operation, if the fossil fuel-power off-road equipment or stationary sources will be used on-site during operation, they will need to be included in the revised LST analyses and Final EIR. If the revision is not included in the Final EIR, the Lead Agency should provide reasons supported by substantial evidence in the record to explain why a new air quality mitigation measure is not included.

California Emissions Estimator Model (CalEEMod) Fleet Mix

In the Draft EIR, the Lead Agency utilizes the California Emissions Estimator Model (CalEEMod) version 2022.1 to calculate the construction and operation criteria pollutant emissions.¹⁹ For operation analysis, the Lead Agency uses the CalEEMod default fleet mix for commercial land use, and the fleet mix for industrial land use is based on the Traffic Analysis.²⁰ Table 3-7 in Appendix C1 – Air Quality Analysis shows the truck fleet mix for industrial use.²¹ However, in the CalEEMod technical input file for operation,²² the passenger car fleet mix was used instead of the truck fleet mix under industrial land use during operation. Therefore, South Coast AQMD staff recommends that the Lead Agency review and re-calculate the fleet mix in the CalEEMod technical input file reflecting the correct truck fleet mix data to account for the correct emissions generated by trucks and include them in the operation emissions in the Final EIR. If the truck fleet mix is not revised and included in the Final EIR, the Lead Agency should provide reasons supported by substantial evidence in the record to explain why a new air quality mitigation measure is not included.

South Coast AQMD Permits and Responsible Agency

If the implementation of the Proposed Project would require the use of new stationary equipment, such as boilers, heaters, ovens, etc., permits from South Coast AQMD are required. The Final EIR should include a discussion on stationary equipment requiring South Coast AQMD permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project. Any assumptions used for the stationary sources in the Final EIR will also be used as the basis for the permit conditions and limits for the Proposed Project. 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 California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), South Coast AQMD staff requests that the Lead Agency provide South Coast AQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, when the Lead Agency's position is at variance with recommendations raised in the comments, the issues raised in the comments should be addressed in detail, giving reasons why specific comments and suggestions are not accepted. There should be good faith and reasoned

¹⁹ *Ibid.* Page 4.3-19.

²⁰ *Ibid.* Appendix C1 – Air Quality Analysis. Page 54

²¹ *Ibid.* Appendix C1 – Air Quality Analysis. Page 54.

²² CalEEMod Technical Input File.

analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision-makers and to 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 Danica Nguyen, Air Quality Specialist, at dnguyen1@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

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Planning, Rule Development & Implementation

SW:DN

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