



# South Coast Air Quality Management District

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SENT VIA E-MAIL:

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**Draft Environmental Impact Report (DEIR) for Vallarta Market Place  
Community Shopping Center Project (Proposed Project)  
(SCH No: 2024110841)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to review the above-mentioned document. The City of Perris is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff has provided a brief summary of the project information and prepared the following comments which are organized by topic of concern.

**Summary of Proposed Project Information in DEIR**

Based on DEIR, the Proposed Project consists of a total of eight new commercial/retail buildings on a 10.55-acre project site located at the southeast corner of North Perris Boulevard and Placentia Avenue in the City of Perris, CA. The project would include a new grocery store totaling 59,371 square-feet (s.f.), three Quick Serve Restaurant buildings totaling 7,067 s.f., three retail buildings totaling 30,113 s.f., and one convenience store of 4,913 s.f. with an 8-pump (16-position) fueling station. A total of six access driveways would be provided – three along Placentia Avenue and three along Perris Boulevard. A total of 489 parking spaces, including 18 accessible spaces would be constructed.

Based on a review of aerial photographs, South Coast AQMD staff found that the nearest sensitive receptor (i.e., residential development) is located within 100 feet of the Proposed Project site (to north, south, and east of the Proposed Project's site).

Construction of the Proposed Project is anticipated to occur in January 2026.

The Proposed Project is located at the southeastern corner of Placentia Avenue and North Perris Boulevard. It is located approximately 0.9 mile east of Interstate 215 (I-215), approximately 8.3 miles south of State Route (SR-) 60 and approximately 1.3 miles south of March Air Reserve Base/Inland Port Airport (ARB/IPA).

## **South Coast AQMD Comments**

### *Title of the Proposed Project*

Upon review of the CEQA document associated with the Proposed Project, South Coast AQMD staff noticed inconsistencies in the project title, specifically, the interchangeable use of the terms “Community” and “Commercial”, as well as inconsistencies in the Conditional Use Permit (CUP) number (i.e., CUP 23-05264 vs. CUP 05264).

To minimize confusion and ensure clarity for reviewers and the public, South Coast AQMD staff recommends that the Lead Agency address and correct these discrepancies in the Final EIR and the associated CEQA documentation.

### *Ensuring Accurate Assessment of Generated Trips for the Proposed Project*

South Coast AQMD staff submitted a request for the associated technical files for the Proposed Project via e-mail (to Alfredo Garcia on April 22, 2025); however, staff has not received the technical files by today. A review of CalEEMod data as provided in the supporting document “Vallarta Market Place Shopping Center Project – Air Quality/Greenhouse Gas Study”<sup>1</sup>, Section 5.9, indicated that while the Proposed Project is anticipated to include three Restaurant buildings, trip generation was conducted for only two restaurants. If the anticipated trips to and from the Proposed Project site is underestimated, the Draft EIR may have substantially underestimated the exposure of nearby residents to VOC emissions, which are a significant source of cancer risk to the surrounding community. South Coast AQMD staff would appreciate if the Lead Agency could clarify their underlying assumptions in consideration of only two restaurants in calculation of vehicle miles travelled for the Proposed Project or revise the Final EIR to include three restaurants in calculation of generated trips and associated emissions.

### *Use of South Coast AQMD’s Mass Rate Localized Significance Threshold (LST) Look-Up Table to Analyze the Proposed Project’s Localized Air Quality Impact is not Consistent with Guidance for the LST Methodology*

The localized significance threshold (LST) analysis in the Draft EIR appears to incorrectly rely on the LST screening tables to determine the significance of localized air quality impacts. As indicated in Table 3-2 of the LST methodology, these screening tables are not applicable for projects larger than five acres. Since the Proposed Project site size is 10.55 acres and is located in close proximity to sensitive receptors, including residential uses as noted earlier in this letter, reliance on the LST screening tables may underestimate localized air quality impacts. Therefore, it is recommended that the Lead Agency conduct site-specific localized significant analysis (e.g. dispersion modeling) to accurately assess the localized air quality impacts from both construction and operational phases of the Proposed Project and include the results in the Final EIR. If the site-specific localized significant analysis is not included in the Final EIR, the Lead Agency should provide reasons for not having them supported by substantial evidence in the record.

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<sup>1</sup> City of Perris webpage: [https://www.cityofperris.org/departments/development-services/planning/environmental-documents-for-public-review/-folder-476#docan1206\\_1313\\_479](https://www.cityofperris.org/departments/development-services/planning/environmental-documents-for-public-review/-folder-476#docan1206_1313_479)

*Proposed Project Cold Storage Land Use and the Associated Emissions from Transport Refrigeration Units (TRU)*

The project description in the Draft EIR specifies that the Proposed Project includes a new grocery store totaling 59,371 s.f. which is anticipated to operate cold storage. However, while refrigerant emissions by land use was considered under operations emissions in CalEEMod calculations, the DEIR does not include the emissions from TRUs operation in calculation of total operation emissions. It is recommended that the Lead Agency revise the Final EIR to provide an estimate for the number of TRU trucks and trailers that would be involved in the operation of the grocery store with cold storage. If TRUs are planned to be used, the Lead Agency should also update the emissions calculations in the Final EIR to include the emissions from the TRUs in addition to those from truck operation.

*Recommended Additional Air Quality and Greenhouse Gases Mitigation Measures for Operation*

The air quality analysis in the Draft EIR concludes that the Proposed Project's regional operational emissions for volatile organic compounds (VOC) would be significant even after mitigation. The Draft EIR also states that the majority of the Proposed Project's VOC, oxides of nitrogen (NO<sub>x</sub>), and carbon monoxide (CO) operational emissions come from mobile sources. Once in operation, the Proposed Project is anticipated to result in approximately 16,614 trips per day for all mobile sources, as stated in the Draft DEIR Appendix G – Perris Marketplace Trip Gen and VMT Memo. CEQA also requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse air quality impacts. Thus, to further reduce the Proposed Project's air quality impacts for operation, staff recommends that the Lead Agency consider related air quality (AQ) mitigation measures in the Final EIR to further reduce the Proposed Project's significant and unavoidable air quality impacts during operation.

Mobile Sources

1. Require zero-emission (ZE) or near-zero emission (NZE) on-road haul trucks, such as heavy-duty trucks with natural gas engines that meet the CARB's adopted optional NO<sub>x</sub> emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr), if and when feasible.

Note: Given the state's clean truck rules and regulations aiming to accelerate the utilization and market penetration of ZE and NZE trucks, such as the Advanced Clean Trucks Rule and the Heavy-duty Low NO<sub>x</sub> Omnibus Regulation, ZE and NZE trucks will become increasingly more available to use.

2. Require a phase-in schedule to incentivize the use of cleaner operating trucks to reduce any significant adverse air quality impacts.

Note: South Coast AQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency.

3. Minimize the daily number of trucks allowed at the Proposed Project.
4. Provide electric vehicle (EV) charging stations or, at a minimum, provide electrical infrastructure, and electrical panels should be appropriately sized. Electrical hookups should be provided for truckers to plug in any onboard auxiliary equipment.

### Other Area Sources

1. Maximize the use of solar energy by installing solar energy arrays.
2. Use light-colored paving and roofing materials.
3. Utilize only Energy Star heating, cooling, and lighting devices and appliances.

### Design Considerations for Reducing Air Quality and Health Risk Impacts

1. Clearly mark truck routes with trailblazer signs so that trucks will not travel next to or near sensitive land uses (e.g., residences, schools, daycare centers, etc.).
2. Design the Proposed Project such that truck entrances and exits are not facing sensitive receptors and trucks will not travel past sensitive land uses to enter or leave the Proposed Project site.
3. Design the Proposed Project such that any truck check-in point is inside the Proposed Project site to ensure no trucks are queuing outside.
4. Design the Proposed Project to ensure that truck traffic inside the Proposed Project site is as far away as feasible from sensitive receptors.
5. Restrict overnight truck parking in sensitive land uses by providing overnight truck parking inside the Proposed Project site.

Lastly, the South Coast AQMD also suggests that the Lead Agency conduct a review of the following references and incorporate additional mitigation measures as applicable to the Proposed Project in the Final EIR:

1. State of California – Department of Justice: Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act<sup>2</sup>
2. South Coast AQMD 2022 Air Quality Management Plan,<sup>3</sup> specifically:
  - a) Appendix IV-A – South Coast AQMD’s Stationary and Mobile Source Control Measures
  - b) Appendix IV-B – CARB’s Strategy for South Coast
  - c) Appendix IV-C – SCAG’s Regional Transportation Strategy and Control Measure
3. United States Environmental Protection Agency (U.S. EPA): Mobile Source Pollution - Environmental Justice and Transportation.<sup>4</sup>

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<sup>2</sup> State of California – Department of Justice, Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act. Available at: <https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf>

<sup>3</sup> South Coast AQMD, 2022 Air Quality Management Plan (AQMP). Available at: <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan>

<sup>4</sup> United States Environmental Protection Agency (U.S. EPA), Mobile Source Pollution - Environmental Justice and Transportation. Available at: <https://www.epa.gov/mobile-source-pollution/environmental-justice-and-transportation>

*South Coast AQMD Air Permits and Role as a Responsible Agency*

If implementation of the Proposed Project would require the use of new stationary and portable sources, including but not limited to gasoline dispensing facilities, emergency generators, fire water pumps, boilers, etc., air permits from South Coast AQMD will be required. The final CEQA document should include a discussion about the potentially applicable rules that the Proposed Project needs to comply with. Those rules may include, for example, Rule 201 – Permit to Construct,<sup>5</sup> Rule 203 – Permit to Operate,<sup>6</sup> Rule 401 – Visible Emissions,<sup>7</sup> Rule 402 – Nuisance,<sup>8</sup> Rule 403 – Fugitive Dust,<sup>9</sup> Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,<sup>10</sup> Rule 1113 – Architectural Coating,<sup>11</sup> Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil,<sup>12</sup> Rule 1179 – Publicly Owned Treatment Works Operations,<sup>13</sup> Regulation XIII – New Source Review,<sup>14</sup> Rule 1401 – New Source Review of Toxic Air Contaminants,<sup>15</sup> Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants,<sup>16</sup> Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines,<sup>17</sup> etc. It is important to note that when air permits from South Coast AQMD are required, the role of South Coast AQMD would change from a Commenting Agency to a Responsible Agency under CEQA. In addition, if South Coast AQMD is identified as a Responsible Agency, per CEQA Guidelines Sections 15086, the Lead Agency is required to consult with South Coast AQMD.

CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of the process for conducting a review of the Proposed Project and issuing discretionary approvals. Moreover, it is important to note that if a Responsible Agency determines that a CEQA document is not adequate to rely upon for its discretionary approvals, the Responsible Agency must take further actions listed in CEQA Guideline Section 15096(e), which could have the effect of delaying the implementation of the Proposed Project. In its role as CEQA Responsible Agency, the South Coast AQMD is obligated to ensure that the CEQA document prepared for this Proposed Project contains a sufficient project description and analysis to be relied upon in order to issue any discretionary approvals that may be needed for air permits.

For these reasons, the final CEQA document should be revised to include a discussion about any and all new stationary and portable equipment requiring South Coast AQMD air permits, provide the evaluation of their air quality and greenhouse gas impacts, and identify South Coast AQMD as a Responsible Agency for the Proposed Project as this information will be relied upon as the basis for the permit conditions and emission limits for the air permit(s). Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions regarding what types

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<sup>5</sup> South Coast AQMD. Rule 201 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>

<sup>6</sup> South Coast AQMD. Rule 203 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>

<sup>7</sup> South Coast AQMD. Rule 401 available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf>

<sup>8</sup> South Coast AQMD. Rule 402 available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>

<sup>9</sup> South Coast AQMD. Rule 403 available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403>

<sup>10</sup> South Coast AQMD. Rule 1110.2 available at: [https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110\\_2.pdf](https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf)

<sup>11</sup> South Coast AQMD. Rule 1113 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf>

<sup>12</sup> South Coast AQMD. Rule 1166 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>

<sup>13</sup> South Coast AQMD. Rule 1179 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1179.pdf>

<sup>14</sup> South Coast AQMD. Regulation XIII available at: <https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii>

<sup>15</sup> South Coast AQMD. Rule 1401 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf>

<sup>16</sup> South Coast AQMD. Rule 1466 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf>

<sup>17</sup> South Coast AQMD. Rule 1470 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf>

of equipment would require air permits. For more general information on permits, please visit South Coast AQMD's webpage at <https://www.aqmd.gov/home/permits>.

### **Conclusion**

As set forth in California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), the Lead Agency shall evaluate comments from public agencies on the environmental issues and prepare a written response at least 10 days prior to certifying the Final EIR. As such, please provide South Coast AQMD written responses to all comments contained herein at least 10 days prior to the certification of the Final EIR. In addition, as provided by CEQA Guidelines Section 15088(c), if the Lead Agency's position is at variance with recommendations provided in this comment letter, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided.

Thank you for the opportunity to provide comments. 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 Zoya Banan, Ph.D., Air Quality Specialist, at [ZBanan@aqmd.gov](mailto:ZBanan@aqmd.gov) should you have any questions.

Sincerely,

*Sam Wang*

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