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Draft Environmental Impact Report (EIR) for the Proposed Perris Ethanac Travel Center Project (Proposed Project) (SCH No. 2024010850)

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 (Staff) has provided a brief summary of the project information and prepared the following comments.

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

Based on the Draft EIR, the Proposed Project consists of construction and operation of a fueling station and travel center on approximately 14.4 acres of currently vacant land in the City of Perris, Riverside County, California.[1] The aforementioned will include 1) fueling facilities for trucks and passenger vehicles that will include 7 to 8 diesel truck fueling positions, 16 gasoline fueling positions, two aboveground storage tanks, and underground gasoline storage tank(s); 2) an 8,452 square feet (sq ft) truck shop with limited service for trucks such as tire replacement, rotation, and repair and oil changes (no major mechanical or body work will be performed); 3) an 11,752 sq ft convenience store with driver amenities such as shower and laundry facilities; 4) a 2,228 sq ft drive-thru restaurant; and 5) parking facilities which will include 116 truck parking spaces.[2, 3, 4]

The Proposed Project is expected to generate approximately 1,539 to 1,792 one-way truck trips per day and have a throughput of 28,800 gallons of gasoline pumped per day.[5, 6] 15% of trucks visiting the Proposed Project site are also expected to have TRUs.[7] The nearest sensitive receptors (single-family residences) are located approximately 400 feet north of the Proposed Project site.[8] Based on Staff's review of aerial photographs, the nearest off-site worker (a Shell Gas Station and convenience store) is approximately 120 feet south of the Proposed Project site.[9] Construction is

[1] Draft EIR for the Proposed Perris Ethanac Travel Center Project (Draft EIR). 1.0 Executive Summary, p. 1.0-1.
[2] *Ibid.* Appendix A Air Quality/Energy/Greenhouse Gas Emissions Data & Health Risk Assessment (Appendix A), CalEEMod Output File p. 80/80.
[3] *Ibid*. Appendix A Analysis of Public Health Risks, p. 6.
[4] *Ibid*. 3 Project Description, p. 3.0-7.
[5] *Ibid*. Appendix I Transportation Analysis.
[6] *Ibid*. Appendix A Analysis of Public Health Risks, p. 5 and p. 6. (1,800 gallons/pump*16 pumps = 28,800 gallons pumped/day)
[7] *Ibid*. p. 5 and PDF page 107.
[8] *Ibid.* 5 Air Quality, p. 5.1-21 and 5.10-22.
[9] *Ibid*. 3 Project Description, p. 3.0-2.

anticipated to commence in the 1st quarter of 2025 and conclude in early 2026.[10, 11] The Proposed Project is located on the northwest corner of Ethanac Rd and Trumble Rd with the western part of the site running adjacent to the Interstate 215 freeway.[12]

South Coast AQMD Staff's Comments

Health Risk Assessment (HRA) for Cancer Risk Impact

The Proposed Project's toxic air contaminant (TAC) emissions are mainly 1) diesel particulate matter (DPM) from trucks and Truck Refrigeration Units (TRUs); and 2) benzene from the gasoline fueling activity.[13] The results of the Proposed Project HRA show a maximum residential cancer risk (nearest resident located approximately 400 feet north of the Proposed Project site) of 6.22 to 6.88 per million, which is below the 10 in 1 million South Coast AQMD air quality significance threshold for TACs.[14, 15]

- The Air Toxics Health Risk Assessment in Appendix A states that the Air Quality Dispersion Modeling (AERMOD) for DPM from on-site diesel truck idling was performed with the assumption that each truck idles on site for 5 minutes.[16] Because the Proposed Project is a truck stop, it is reasonable to assume that while fueling a truck may be left running for at least 15 minutes (while fueling, the truck operator may stop in the convenience store, use the restroom, etc.). For this reason, Staff recommends that a minimum of 15 minutes of idling per truck be used in the model.

- For TRUs, the assumption used in the model is that trucks run their TRUs for 15 minutes per hour.[17] The cancer risks associated with TRUs traveling along roadways (off-site truck travel emissions), however, was not evaluated.[18] This omission leads to an underestimation of the off-site truck emissions. Staff therefore recommends that the Lead Agency re-run the model to account for the TRU emissions while traveling along roadways.

- For the Control Pathway in AERMOD, the Building Downwash option for the convenience store and truck shop buildings was not included.[19] This omission results in an underestimation of the ground-level pollutant concentrations near the buildings. Staff therefore recommends the Lead Agency: 1) re-run the operational HRA to include building downwash for the convenience store and truck shop buildings to analyze ground-level concentrations more accurately; and 2) include the results in the Final EIR.

[10] *Ibid*. CalEEMod technical files provided to South Coast AQMD staff via e-mail (Lupita Garcia, personal communication, August 2, 2024)
[11] *Ibid.* 3 Project Description, p. 3.0-10.
[12] *Ibid.* p. 3.0-4.
[13] *Ibid*. Appendix A Analysis of Public Health Risks, p. 3.
[14] *Ibid*. 5 Air Quality, 5.1-34.
[15] South Coast AQMD's air quality significance thresholds can be found at: https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf
[16] *Ibid*. Appendix A Analysis of Public Health Risks, p. 5.
[17] *Ibid*.
[18] *Ibid*.
[19] *Ibid*. HRA technical files provided to South Coast AQMD staff via e-mail (Lupita Garcia, personal communication, August 2, 2024)

- For the Meteorology Pathway in AERMOD, the Base Elevation for the South Coast AQMD **Perris** Meteorological Station was set to 499.6 meters, but according to the South Coast AQMD's Version 9 Meteorological Station List, the base elevation for the surface station anemometer is 442 meters.[20] Staff recommends that the Lead Agency re-run the model with the correct base elevation for the **Perris** Meteorological Station.

Inconsistency in Number of Truck Stop Fueling Positions and Truck Trip Generation for Operation Phase

Appendix I of the Draft EIR shows that the truck trip generation was approximated based partly on the number of truck fueling positions.[21] There is inconsistency, however, regarding the number of truck fueling positions that will be located at the Propose Project site. In Appendix I, one table shows seven truck stop fueling positions while another shows eight truck stop fueling positions.[22] This results in **1,539** daily one-way truck trips and **1,792** daily one-way truck trips, respectively.[23] The HRA analysis for the Proposed Project relies on **1,539** truck trips, which resulted in lower estimated DPM than if 1,792 truck trips were relied upon.[24] For context, Figures 1 and 2 provide screenshots from Appendix I which illustrate the difference in the number of potential trips that would be generated from these two different truck stop fueling position numbers.

SUMMARY OF PROJECT TRIP GENERATION
PERRIS TRAVEL CENTER

Trip Generation Rates

Land Use	Unit	Daily(a)	AM Peak Hour (a)			PM Peak Hour (a)		
			In	Out	Total	In	Out	Total
Convenience Store/Gas Station/Fast-Food Restaurant with Drive-Through	FP	268.110	50%	50%	13.02	50%	50%	18.29
Truck Stop	FP	219.860	49%	51%	12.40	53%	47%	13.00

Project Trip Generation

Land Use	Quantity	Unit	Daily	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Passenger Car Trips									
Convenience Store/Gas Station/Fast-Food Restaurant with Drive-Through	16	FP	4,290	104	104	208	146	146	292
Pass-By Trips (b) (Daily: 25%, AM: 50%, PM: 55%)			-1,072	-52	-52	-104	-80	-80	-161
Truck Trips									
Truck Stop	7	FP	1,539	43	44	87	48	43	91
PCE Truck Stop (PCE Factor = 3)			4,617	128	133	260	145	128	273
Total Driveway Trips			**8,907**	**232**	**237**	**469**	**291**	**274**	**565**
Passenger Car			4,290	104	104	208	146	146	292
Truck PCE			4,617	128	133	260	145	128	273
Total Primary (Net New) Trips			**7,834**	**180**	**185**	**365**	**210**	**194**	**404**
Passenger Car			3,217	52	52	104	66	66	131
Truck PCE			4,617	128	133	260	145	128	273

Notes:
KSF = thousand square feet, FP = Fueling Position
AM and/or PM rates correspond to peak of adjacent street traffic

(a) Based on Trip Generation data at three comparable Travel Center sites (Orland, Patterson, and Lost Hills). Data collection worksheets are provided in Appendix C.
(b) Pass-by rates from ITE Trip Generation Manual, 11th Edition

Figure 1: Screenshot from Appendix I Transportation Analysis, PDF p. 20. Quantity of fueling positions (seven) and daily truck trips (1,539) have been highlighted in yellow

[20] South Coast AQMD Version 9 Meteorological Stations List available at https://www.aqmd.gov/docs/default-source/air-quality/meterorological-data/met-data-information/2017FinalMetStationList_101317.pdf
[21] *Ibid*. Appendix I Transportation Analysis, p. 13.
[22] *Ibid*. Appendix I Transportation Analysis, p. 15 and PDF p. 55.
[23] *Ibid*.
[24] *Ibid*. Appendix A Analysis of Public Health Risks, p. 5.

SUMMARY OF PROJECT TRIP GENERATION
PERRIS TRAVEL CENTER

Trip Generation Rates

Land Use	ITE Code (a)	Unit	Daily	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Fast-Foot Restaurant w Drive-Through Window	934	KSF	467.480	51%	49%	44.61	52%	48%	33.03
Convenience Store/Gas Station (GFA 5.5-10k)	945	FP	345.750	50%	50%	31.60	50%	50%	26.90
Truck Stop	950	FP	224.000	49%	51%	13.97	53%	47%	15.42

Project Trip Generation

Land Use	Quantity	Unit	Daily	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Passenger Car Trips									
Fast-Food Restaurant with Drive-Through	2.228	KSF	1,042	50	49	99	38	36	74
Internal Capture (b) (Daily: 10%, AM: 11%, PM: 10%)			-104	-6	-5	-11	-4	-3	-7
Pass-By Trips (c) (Daily: 25%, AM: 50%, PM: 55%)			-235	-22	-22	-44	-19	-18	-37
Convenience Store/Gas Station (GFA 5.5-10k)	16	FP	5,532	253	253	506	215	215	430
Internal Capture (b) (Daily: 10%, AM: 11%, PM: 10%)			-553	-28	-28	-56	-22	-21	-43
Pass-By Trips (c) (Daily: 50%, AM: 76%, PM: 75%)			-2,490	-171	-171	-342	-145	-145	-290
Truck Trips (d)									
Truck Stop	8	FP	1,792	55	57	112	65	58	123
PCE Truck Stop (PCE Factor = 3)			5,376	165	171	336	195	174	369
Total Driveway Trips			**11,293**	**434**	**440**	**874**	**422**	**401**	**823**
Passenger Car			5,917	269	269	538	227	227	454
Truck PCE			5,376	165	171	336	195	174	369
Total Primary (Net New) Trips			**8,568**	**241**	**247**	**488**	**258**	**238**	**496**
Passenger Car			3,192	76	76	152	63	64	127
Truck PCE			5,376	165	171	336	195	174	369

Notes:
KSF = thousand square feet, FP = Fueling Position
AM and/or PM rates correspond to peak of adjacent street traffic
(a) Trip Generation data for ITE Codes from ITE *Trip Generation Manual, 11th Edition*
(b) Internal capture rates from ITE Trip Generation Handbook, 3rd Edition NCHRP 684 Internal Trip Capture Estimation Tool
(c) Pass-by rates from ITE Trip Generation Handbook, 3rd Edition for ITE LU 934 Fast-Food Restaurant With Drive-Through Window and LU 945 Gasoline/Service Station With Convenience Market
(d) No internal capture was assumed for the Truck Stop land use, as a truck stop is assumed to include a variety of services

Figure 2: Screenshot from Appendix I Transportation Analysis, PDF p. 55. Quantity of fueling positions (eight) and daily truck trips (1,792) have been highlighted in yellow

The Proposed Project's truck stop fueling positions and daily truck trip generation values presented in the Draft EIR, Appendix A, and Appendix I are inconsistent.[25, 26] This discrepancy affects operational emissions and HRA results. Due to the large difference in these truck trip numbers, Staff recommends the Lead Agency make the following revisions in the air quality analysis: 1) identify and consistently apply the correct truck stop fueling positions in the truck trip generation calculations; 2) re-evaluate the operational emissions associated with those trucks in the air quality and HRA analysis; and 3) update all the corresponding appendices and include the updated information in the Final EIR.

South Coast AQMD Air Permits and Role as a Responsible Agency

The Draft EIR states that the Proposed Project may require a South Coast AQMD permit to operate.[27] The Proposed Project will have a fueling facility that will include 16 gas fueling positions, seven diesel fueling positions, two aboveground storage tank farms, underground gasoline storage tank(s) and a drive-thru restaurant and convenience store.[28] If implementation of the Proposed Project would require the use of new stationary and portable sources, including but

[25] *Ibid.* 3 Project Description, p. 3.0-7.
[26] *Ibid.* Appendix A CalEEMod Output File p. 10/80 and 80/80.
[27] Draft EIR. 3 Project Description, p. 3.0-10.
[28] Draft EIR. 3 Project Description, p. 3.0-7.

not limited to gasoline transfer and dispensing facilities, emergency generators, fire water pumps, boilers, spray booths, etc., air permits from South Coast AQMD will be required and the role of South Coast AQMD would change from a Commenting Agency to a Responsible Agency under CEQA. The final CEQA document should therefore include a discussion about the potentially applicable South Coast AQMD rules that the Proposed Project needs to comply with. Those rules may include, for example, Rule 201 – Permit to Construct, Rule 202 – Temporary Permit to Operate, Rule 203 – Permit to Operate, Rule 403 – Fugitive Dust, Rule 461 – Gasoline Transfer and Dispensing, Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines, Rule 1113 – Architectural Coating, Rule 1113 – Control of Emissions from Restaurant Operations, Rule 1401 – New Source Review of Toxic Air Contaminants, etc. [29, 30, 31, 32, 33, 34, 35, 36, 37, 38]

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 evaluating the applications for air permits. For these reasons, the Final EIR should include a discussion about any new stationary and portable equipment requiring South Coast AQMD air permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project.

The Final EIR should also include calculations and analyses for construction and operation emissions for the new stationary and portable sources, as this information will also 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 of equipment would require air permits. For more general information on permits, please visit South Coast AQMD's webpage at: http://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.

[29] South Coast AQMD. Rule 201 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf
[30] *Ibid.* Rule 202 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-202.pdf
[31] *Ibid.* Rule 203 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf
[32] *Ibid.* Rule 403 available at https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf
[33] *Ibid.* Rule 403.1 available at https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403-1.pdf
[34] *Ibid.* Rule 461 available at https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-461.pdf
[35] *Ibid.* Rule 1110.2 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf
[36] *Ibid.* Rule 1113 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf
[37] *Ibid.* Rule 1138 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1138.pdf
[38] *Ibid.* Rule 1401 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf

Please contact Evelyn Aguilar, Air Quality Specialist, at eaguilar@aqmd.gov should you have any questions.

Sincerely,

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