



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178

(909) 396-2000 • www.aqmd.gov

E-Mailed: September 25, 2014  
dsbardellati@cityofperris.org

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Ms. Diane Sbardellati  
Planning Division  
City of Perris  
135 North "D" Street  
Perris, CA 92570

## **Review of the Draft Environmental Impact Report (Draft EIR) for the Proposed Integra Perris Distribution Center Project**

The South Coast Air Quality Management District (SCAQMD) staff 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 Environmental Impact Report (Final EIR) as appropriate.

The SCAQMD staff is concerned about the project's significant regional operational air quality and climate change impacts identified in the Draft EIR. Therefore, the SCAQMD staff recommends that the Lead Agency incorporate additional mitigation measures (MMs) in the Final EIR that minimize the project's significant air quality and climate change impacts pursuant to Section 15126.4 of the California Environmental Quality Act (CEQA) Guidelines. Additionally, SCAQMD staff recommends that the Lead Agency further substantiate the methodology used to determine the project's truck trip generation rates or revise the rate to be consistent with the SCAQMD staff recommended CEQA interim measure for assessing trip rates from high cube warehouses. Also, since there are a number of related projects involving diesel fueled trucks near the project area, these previous and current projects should be included in the cumulative portion of the Final EIR. Lastly, some calculation methodologies in the Health Risk Assessment (HRA) should be reviewed and modified in the Final EIR. Detailed comments follow 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 Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,

A handwritten signature in cursive script, appearing to read "Ed Eckerle".

Ed Eckerle  
Program Supervisor  
Planning, Rule Development & Area Sources

Attachment

EE:DG

RVC140808-04  
Control Number

### Mitigation Measures for Operational Air Quality and Climate Change Impacts (Mobile Sources)

1. The operational air quality analysis provided in the Draft EIR demonstrates significant regional air quality and GHG impacts during operation. These impacts are primarily (over 90%) from mobile source emissions related to vehicle trips associated with the proposed project. However, the Draft EIR does not consider all feasible mitigation measures (MMs) to reduce this impact. Therefore, SCAQMD staff recommends the Lead Agency reduce the project's significant air quality impacts by incorporating additional transportation MMs, such as those listed below.
  - a) Improve traffic flow by signal synchronization.
  - b) Provide food options, fueling, truck repair and or convenience stores on-site to minimize the need for trucks to traverse through residential neighborhoods.
  - c) Provide electric vehicle (EV) charging stations (see the discussion below regarding EV charging stations).
  - d) Require the use of 2010 and newer diesel trucks (e.g., goods/materials delivery trucks) and if the Lead Agency determines that 2010 model year or newer diesel trucks cannot be obtained the Lead Agency shall require use of trucks that meet EPA 2007 model year NOx emissions requirements.

In the event that the requirements of MM (d) above are not feasible for all trucks, the Lead Agency should evaluate the feasibility of requiring only tenant-owned trucks to meet the requirements of MM (d).

### Electric Vehicle (EV) Charging Stations

Trucks that can operate at least partially on electricity have the ability to substantially reduce the significant NOX impacts from this project. Further, trucks that run at least partially on electricity are projected to become available during the life of the project as discussed in the 2012 Regional Transportation Plan. It is important to make this electrical infrastructure available when the project is built so that it is ready when this technology becomes commercially available. The cost of installing electrical charging equipment onsite is significantly cheaper if completed when the project is built compared to retrofitting an existing building. Therefore, the SCAQMD staff recommends the Lead Agency require the project to be constructed with the appropriate infrastructure to facilitate sufficient electric charging for trucks and light duty vehicles to plug-in. 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<sup>1</sup>. At a minimum, the electrical panels should be sufficiently sized to allow future upgrades and wiring should be provided to docks.

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<sup>1</sup> [http://ladbs.org/LADBSWeb/LADBS\\_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf](http://ladbs.org/LADBSWeb/LADBS_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf)

### Mitigation Measures for Operational Air Quality and Climate Change Impacts (Non-Mobile Sources)

2. In addition to the mobile source mitigation measures identified above, the Lead Agency should incorporate the following onsite area source mitigation measures below to reduce the project's overall significant regional air quality impacts and GHG impacts during operation. These mitigation measure should be incorporated pursuant to CEQA Guidelines §15126.4
  - a) 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 (i.e. in coordination and beyond the requirements of PDF 4-1, if possible). At a minimum, the project developer should be required to make a good faith effort to work with the local utility to install the maximum amount of solar panels onsite.
  - b) Require all lighting fixtures (not only street lighting), including signage, to be state-of-the art and energy efficient, and require that new traffic signals have light-emitting diode (LED) bulbs and require that light fixtures be energy efficient compact fluorescent and/or LED light bulbs. Where feasible use solar powered lighting.
  - c) Maximize the planting of trees in landscaping and parking lots.
  - d) Use light colored paving and roofing materials.
  - e) Utilize only Energy Star heating, cooling, and lighting devices, and appliances.
  - f) Install light colored "cool" roofs and cool pavements.
  - g) Limit the use of outdoor lighting to only that needed for safety and security purposes.
  - h) Require use of electric or alternatively fueled sweepers with HEPA filters.

### Fleet Mix/Trip Rate (Air Quality Analysis)

3. The Draft EIR relies on a project specific traffic study to determine the project's air quality impacts. The traffic study uses trip rates other than the SCAQMD staff interim recommendation for assessing trip rates from high cube warehouses for CEQA air quality analyses. As a result, the SCAQMD staff recommends the Lead Agency revise the Draft EIR to include the Institute of Transportation Engineers (ITE) truck trip rate for high cube warehouses (i.e. 0.64 per 1,000 ft<sup>2</sup> of warehouse space) or provide substantial evidence to demonstrate that another rate is more appropriate for the air quality analysis, consistent with the SCAQMD's applicable CEQA interim measure. Further, details regarding the development of SCAQMD staff's interim recommendation can be found on our webpage here: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/high-cube-warehouse>.

### Health Risk Assessment

4. SCAQMD staff appreciates that an early draft HRA protocol was provided for our review prior to distribution of the Draft EIR. The comments below are based on additional information that is available in the Draft EIR.
  - a) The roadways modeled in the HRA do not match the proposed truck trip distribution pattern shown in Exhibit 4.8-5 of the Draft EIR. In the Draft EIR, approximately 20% of the trucks accessing the site will use the southeastern entrance on Markham Street. However, the modeled sources do not include any trucks accessing this southeastern entrance as seen in Exhibit 4.2-1 of the Draft EIR. In addition, no sources have been modeled for trucks traveling in the northwest portion of the site, where Exhibit 4.8-5 shows 15% of trucks accessing this area. The modeling should be revised to include emission sources along Markham Street and Indian Street and emission sources on the northwest portion of the site.
  - b) In the HRA, a single emission rate was applied to all offsite roadways. However, as shown in Exhibit 4.8-5 of the Draft EIR, approximately 75-80% of trucks will access the site from the northwest, with only about 20-25% accessing the site from the east. This non-uniform distribution will yield higher emissions in the northwest, and lower emissions in the east. The modeling should be revised to reflect this geographic difference in emission rates.

### Cumulative Impacts

5. The Cumulative Impacts Section should be revised in the Final EIR to include the foreseeable projects (e.g. First Nandina Logistics Center Project, north of the project site) if those projects include vehicle traffic, especially diesel fueled trucks that would utilize the same truck routes as the proposed project. The cumulative traffic on local roads from these or other planned goods movement facilities in the immediate vicinity may contribute to a localized significant air quality health risk from diesel particulate matter that should be discussed and mitigated if found significant in the Final EIR.