



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
Duke Warehouse at Patterson Avenue and Nance Street Project (Proposed Project)
(SCH Number.: 2022010274)**

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 air quality analyses for construction and operation, health risk assessment during operation, California Emissions Estimator Model (CalEEMod) fleet mix, vehicle miles travel (VMT), and the 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 EIR¹, the Lead Agency proposes to construct and operate of approximately 769,668 square feet (SF) of high-cube, non-refrigerated, warehouse building which includes approximately 20,000 SF of office space. The warehouse building will be constructed as a "spec" building with no specific tenant identified at this time. It is anticipated that the building could operate 24 hours a day, seven days a week. The building includes 64 dock doors on the east side and 49 dock doors on the west side. The proposed Project site will also provide 366 automobile parking stalls, consisting of 326 standard stalls, 10 American Disabilities Act-compliant (ADA) parking stalls, and 30 Electric Vehicle (EV)/Clean Air/Vanpool stalls and 140 trailer parking stalls. Automobile parking is provided in three locations: one across from each office area on the northwest and southwest corners of the building and a third area along the north side of the building. The Project site will also include two shaded outdoor patio areas for break areas as employee amenities. These outdoor amenity areas are adjacent to the offices proposed at the northwest and southwest corner of the building. The approximate 35.7-net-acre Proposed Project site is located at the northeastern corner of Patterson Avenue and Nance Street, within the Perris Valley Commerce Center Specific Plan (PVCCSP) planning area of the City of Perris, Riverside County, California. The Proposed Project's construction is anticipated to require approximately eleven months.²

¹ Draft EIR. Page 1-15.

² Ibid. Page 5.2-34.

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.³ The PVCCSP was adopted by the City of Perris pursuant to a certified Environmental Impact Report (EIR) on 1/10/2012.⁴ Prior to certification of the PVCCSP, a Draft EIR was released for public review and comment between 7/20/2011 – 9/6/2011.⁵ 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, 2022.⁶ 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,⁷ other development projects are located from 1000 feet to 1 mile from the Proposed Project, based on the ariel photographs. These projects are First Harley Knox - DPR20-00014 Industrial Project (Final Initial Study/Mitigated Negative Declaration No. 2369 was prepared in February 2022), 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 especially from the increased heavy duty diesel mobile sources 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.

³ *Ibid.* Page 1-15.

⁴ ORDINANCE NUMBER 1284.

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

⁵ 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>

⁶ Perris Valley Commerce Center Specific Plan Amendment No. 12, approved January 11, 2022, available at <https://www.cityofperris.org/home/showpublisheddocument/2647/637799977032200000>

⁷ City of Perris. Planning – Environmental Documents. Access at: <https://www.cityofperris.org/departments/development-services/planning/environmental-documents-for-public-review>.

Air Quality Analyses and Health Risk Assessment (HRA) during Operation

In the Draft EIR Air Quality Section and Appendix B.1 and B.2, the Lead Agency utilizes the CalEEMod version 2020.4.0 to estimate the construction and operation emissions. The CalEEMod output file in Appendix B.1 shows the information regarding the truck fleet mix for the warehouse land use. The fleet mix from the CalEEMod output file appears to not match with the truck percentages under Project Trip Generation in Appendix K.2. For instance, the heavy-heavy duty (HHD) truck percentage in the CalEEMod output file shows 9.8%, while Appendix K.2 shows 15.6%. The CalEEMod output file in Appendix B.1 also include the model default numbers for mobile homes, urban buses, school buses and other vehicle types which are not expected to be used in the Proposed Project. In addition, the VMT from the CalEEMod output file appears to not match with those in Appendix K.1, VMT Analysis. For example, the daily VMT in the Appendix B.1 is 1,077.54 from the CalEEMod default but the estimated daily VMT shows 15,412 in the Appendix K.1 generated from the Proposed Project. Therefore, the total operational emissions estimated and used in the air quality analyses and the associated impacts from HRA are underestimated. South Coast AQMD staff recommends that the Lead Agency review and revise the fleet mix and VMT information in the CalEEMod, re-calculate the emissions, and include them in the Final EIR reflecting the correct truck fleet mix percentages and VMT. If the revision is not included in the Final EIR, the Lead Agency should provide reasons for not re-calculating it supported by substantial evidence in the record.

Dispersion Modeling in HRA during Operation

The Lead Agency utilizes AERMOD/HARP dispersion model to analyze the health risks from the Proposed Project.⁸ 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 truck idling emissions would need to be estimated separately and included in the dispersion modeling analysis and HRA as point sources. However, the HRA modeling file does not indicate to include those emissions.

In addition, it is not clear in the Draft EIR if the stationary combustion engines (e.g. diesel firewater pump, diesel emergency generator, and etc.) or off-road combustion mobile source (e.g. diesel forklift) will be used onsite during operation. If any of these will be used when implementing the Proposed Project, they will need to be added as additional sources to the health risk assessment and dispersion modeling files.

Therefore, South Coast AQMD staff recommend 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 the revision is not included.

⁸ *Ibid.* Appendix B.2

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 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 Evelyn Aguilar, Air Quality Specialist, at eaguilar@aqmd.gov or myself, should you have any questions or wish to discuss the comments.

Sincerely,

Sam Wang

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Program Supervisor, CEQA-IGR

Planning, Rule Development & Implementation

SW:EA

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