



South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

E-MAILED: SEPTEMBER 6, 2011

September 6, 2011

Ms. Diane Sbardellati, Associate Planner, dsbardellati@cityofperris.org
Development Services Department, Planning Division
City of Perris
135 N. "D" Street
Perris, CA 92570

**The Draft Environmental Impact Report (Draft EIR) for the Proposed
Perris Valley Commerce Center (PVCC) Specific Plan**

The South Coast Air Quality Management District (AQMD) 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 CEQA document.

In the project description, the lead agency proposes the adoption of the proposed Perris Valley Specific Plan (PVCC Specific Plan), which would serve as a master development plan for 5.3 square miles and over 3,500 acres within the northern part of the City of Perris. The proposed project also includes changes to the original Perris General Plan EIR (Perris GP EIR, October 2004) land use designations and acreage, creates a list of permitted uses, guidelines for landscape and architectural design, infrastructure plans, and administrative procedures. Proposed land uses include 357 acres of business park/professional office uses; 309 acres of commercial uses; 408 acres of general industrial uses; and 1,836 acres of light industrial uses. The proposed project would also generate approximately *half a million* daily vehicle trips¹ including a substantial number of trucks.

Given the potentially significant air quality impacts that are driven by the high vehicular emissions, AQMD staff recommends that the lead agency include a more robust analysis of cumulative impacts in the Final EIR. Further, as the proposed land uses are dedicated primarily to industrial land uses, such as warehousing/distribution centers, the lead agency should revisit its estimate of the number of trucks projected to serve the site. Due to the substantial increase in truck traffic proposed by this project, the lead agency should also provide additional analysis demonstrating that the project will not significantly impact sensitive receptors during operation, and that it will not cause a significant greenhouse gas impact. Lastly, the project should evaluate additional mitigation

¹ Draft EIR, Page 4.10-17.

Ms. Diane Sbardellati,
Associate Planner

2

September 6, 2011

measures to further reduce any significant air quality and greenhouse gas impacts in the Final EIR. Detailed comments regarding these issues are attached to this letter.

Pursuant to Public Resources Code Section 21092.5, please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. The AQMD staff is available to work with the Lead Agency to address these issues and any other air quality questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,



Ian MacMillan
Program Supervisor, Inter-Governmental Review
Planning, Rule Development & Area Sources

IM:GM

RVC110721-03
Control Number

1) Cumulative Air Quality and Health Risk Impacts

The Draft EIR includes a brief discussion of the recent development in the project area, including the individual health risk impacts of several recent goods movement projects (Table 1). In previous comment letters² AQMD staff has noted the large increase in warehouse uses and associated trucking emissions that have been proposed within the area. AQMD staff has consistently requested that the cumulative effect of these proposed projects be addressed prior to project approval. To our knowledge, the lead agency has not yet completed an analysis of this kind, yet concludes that sensitive receptors will not be significantly impacted by the cumulative effect of these projects. Given the air quality impacts experienced by other communities located in the SCAQMD that have similarly high proportions of warehousing land uses, this result is questionable. This specific plan would seem to be the perfect opportunity to address the potentially significant cumulative health risk impacts that may be associated with the proposed land use changes.

Table 1

Name	Cancer Risk (per million)	Size (MSF)	EIR Date
Perris Ridge Commerce Center I	4.6	1.91	April 2007 Final
Oleander Industrial Park	180	1.2	September 2008 Final
Rider Distribution Center	32.6	0.6	April 2009 Final
Markham Business Center	2.1	1.75	June 2009 Final
Oakmont II	6.4	1.60	December 2009 Final
Perris Ridge Commerce Center II	3	2.0	December 2009 Final
Nuevo Business Park Phase II	19	2.0	December 2009 Final
South Perris Industrial	7.4	7.4	May 2010 Final
Rados Distribution Center	2.1	1.2	July 2011 Final

MSF – Million Square Feet

As noted in the PVCC Draft EIR, the lead agency has relied on the previously certified general plan or on future analyses to address cumulative air quality impacts in the PVCC Draft EIR.³ Since the projects included in previous general plan documents and other projects like those in the following table were not included in the PVCC Draft EIR, it is not clear that all past, present and probable future projects have been considered. Therefore, the AQMD staff recommends that the Cumulative Impact Analysis be revised to include any projects from the general plan documents, the projects listed in the table above and any other applicable project in the Final EIR. This analysis should include a cumulative health risk assessment that evaluates the impacts to sensitive receptors from trucking activities on and near the project sites, and from associated trucking activities at nearby support services that will cater to this new business.

² Final EIR South Perris Industrial Project (June 24, 2010); Draft EIR Perris Downtown Specific Plan (August 12, 2011); Final EIR Rados Distribution Center (September 10, 2010)

³ City of Perris General Plan 2030 (Perris GP) and City of Perris General Plan 2030 Draft Environmental Impact Report (Perris GP EIR).

2) Truck Trips

In the URBEMIS model analysis, the lead agency utilized the default EMFAC fleet mix to determine the proportion of vehicles serving the project that will be trucks. For example, the proportion of heavy-heavy duty trucks assumed for this project is only 1.7%. This assumption should be revisited given the high proportion of warehousing land uses that are being proposed by the project. The lead agency may choose to use other trip generation studies to validate its choice of trucking percentage such as the Fontana Truck Trip Study, or the Appendix to the CalEEMod User Guide.

3) Greenhouse Gas Impacts

The lead agency concludes that the project will not have a significant impact on greenhouse gas impacts (page 4.2-41 of the Draft EIR). However the lead agency did not present a quantified existing baseline of GHG emissions, nor a potential project increment. Therefore, the lead agency has not demonstrated that the 681,878 MT of CO₂e emissions predicted for this project present a less than significant impact. These emissions have also not been quantitatively compared against any relevant threshold, including SCAQMD's recommended industrial source threshold of 10,000 MT, or the reductions required by AB 32. AQMD staff recommends that the lead agency provide a more robust analysis of potential GHG impacts and demonstrate why this potentially substantial increase in GHG emissions over existing land uses is not significant.

4) Mitigation Measures

The Draft EIR relies on two potential mitigation measures to reduce potentially significant impacts from siting these industrial/warehousing land uses adjacent to sensitive receptors such as homes. This includes setbacks specified by the California Air Resources Board, or inclusion of high efficiency filtration in HVAC systems if setbacks are found to be infeasible. The lead agency then concludes that sensitive receptors would not be subject to significant levels of air pollution. As noted in comment #1 above, the lead agency has not provided the substantial evidence needed to demonstrate that unmitigated health risks are less than significant. Further, the lead agency has not demonstrated that enhanced filtration in HVAC systems would provide the necessary protection to reduce any potentially significant impacts to a less than significant level. For example, filtration has greatly diminished to no effect when doors or windows are left open, and has zero efficiency for outdoor exposures. Filters also typically do not provide any protection against non-particulate pollution (i.e., gases), and have long term maintenance costs that may not be feasible for all projects.

The lead agency should consider additional mitigation measures including:

- Limit the projects to only use newer truck fleets (similar to the proposed construction mitigation measures for the offroad fleet), such as 2007 or 2010 trucks, or alternative fueled trucks.
 - At a minimum, truck fleets operating within the specific plan area should be required to apply for funding (from ARB or AQMD) to upgrade their fleets, and if awarded should be required to use those funds to upgrade their fleets.
- Projects should also be limited to the number of trucks specified in the EIR.

- Individual projects included inside the specific plan area that have a high volume of trucks should also become SmartWay partners to reduce fuel use and emissions.
- Trucker support services (such as mechanics, restaurants, etc.) should also be encouraged within the specific plan area.