



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

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Ms. Clara Miramontes, Planning Manager, cmiramontes@cityofperris.org
Development Services Department, Planning Division
City of Perris
135 N. "D" Street
Perris, CA 92570

Draft Environmental Impact Report (Draft EIR) for the Proposed Perris Downtown Specific Plan (SCH NO. 2010031028)

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 a Specific Plan Amendment to allow a mix of uses within the Downtown, including a maximum of 825,056 square feet (sq.ft) of retail uses; 1,878,641 sq.ft of office uses; and 4,946 single- and multiple-family dwelling units. The Specific Plan will provide area-specific land use regulations and development guidelines for specific transects within the project area. A General Plan Amendment would also allow for the implementation of the Draft Specific Plan specifying the Downtown Specific Plan on the Perris General Plan Land Use Map.

The AQMD staff is concerned that the proposed project includes existing and planned siting of sensitive receptors in close proximity to large sources of vehicular emissions. This includes the Academy Community Day School and residences planned within the Urban Village area, which would be located adjacent to the proposed South Perris Industrial Park and the 215 Freeway, respectively. Since diesel particulates have been designated as a carcinogen by the California Air Resources Board (CARB) and it appears that these sensitive receptors will be exposed to substantial diesel particulate emissions from diesel fueled truck traffic, the AQMD staff recommends that all new sensitive receptor land uses maintain the recommended CARB land use buffer distances¹ to reduce potential adverse air quality impacts and health effects. This is especially important since the 215 Freeway will see a substantial increase of diesel fueled truck traffic from the

¹ Air Quality and Land Use Handbook developed by the California Air Resources Board (April 2005)
<http://www.arb.ca.gov/ch/landuse.htm>

many warehouse uses including the South Perris Industrial Park proposed over the last three years in the City of Perris.

Second, given the rural nature of the area, there is the potential that a portion of the increased truck traffic would be drawn to the proposed project area to use truck facilities e.g., fueling stations, maintenance facilities, restaurants, etc. The AQMD staff is concerned that the Draft EIR does not adequately consider the cumulative air quality impacts from the large increase in the past few years of large goods movement projects surrounding the proposed project site. AQMD staff noted in a previous comment letter dated June 24, 2010 (Attached, Final EIR South Perris Industrial Project) that over 17.75 million square feet of new warehousing space has been proposed over the last three years that would produce associated cumulative adverse air quality and health effects from the projected thousands of trucks operating daily throughout the community area including increased truck trips on the 215 Freeway and possibly increased trips within the Perris Downtown Specific Plan area. The AQMD staff is concerned that all past, present and probable future projects are not included in Table 4-1 Cumulative Impacts.

The Cumulative Impacts Section should be revised in the Final EIR and include the projects listed in the table below as well as any other foreseeable projects if those projects include vehicle traffic, especially diesel fueled trucks, that would operate near or pass by the proposed project site including the sensitive receptor areas included in the project description.

Name	Size (MSF)	EIR Date
Oleander Industrial Park	1.2	September 2008 Final
Rider Distribution Center	0.6	April 2009 Final
Markham Business Center	1.75	June 2009 Final
Oakmont II	1.60	June 2009 Draft
Perris Ridge Commerce Center II	2.0	August 2009 Final
Nuevo Business Park Phase II	2.0	December 2009 Final
Rados Distribution Center	1.2	July 2011 Final
South Perris Industrial	7.4	May 2010 Final

MSF – Million Square Feet

AQMD staff believes that the cumulative impacts analysis should also include the proposed Perris Valley Commerce Center (PVCC) Specific Plan project, whose Draft EIR (SCH NO. 2009081086) was released June 29, 2011 for public review. Although just over two miles from the proposed Downtown Specific Plan Area, the proposed PVCC consists of 5.23 square miles of proposed uses that 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. With the PVCC project generating approximately 225,825 daily truck trips² {549,453 total daily trips multiplied by vehicles weighing greater than 3,750 pounds (41.1 %)}, it is likely that some of this

² Draft EIR, Appendix C, Air Quality - URBEMIS2007 Computer Model Output Sheets Operational Emission Estimates.

truck traffic will traverse the Downtown Specific Plan Area to use truck facilities. In addition to adding these projects to the cumulative analysis, the AQMD staff recommends that a community-wide health risk assessment be conducted to determine the effects on sensitive receptors and off-site workers from the increased diesel exhaust emissions.

In addition, AQMD staff notes that the URBEMIS2007 land use computer modeling estimates (Appendix D, Air Quality Data) show that the proposed project will generate approximately 64,530 daily trips in Year 2035 (project buildout). However, the amount of project trips estimated in Appendix C, Traffic Impact Study, is 70,158 daily trips. These different daily trip estimates should be reconciled in the Final EIR, and if needed, the air quality estimates should be revised in the Final EIR.

Finally, AQMD staff recommends that the lead agency adopt a mitigation measure that would enforce parking and idling restrictions and limit where trucks can be parked overnight, stored and maintained in order to reduce adverse air quality and health effects to residents and other sensitive receptors in the area.

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

Attachment

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