



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Draft Subsequent Environmental Impact Report (SEIR) for the Proposed Major Modification 17-05075 to Integra Perris Distribution Center Project (SCH No.: 2014051065)

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 SEIR.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to build 273,000 square feet of warehouse uses to be added to the existing 864,000-square-foot warehouse on 10.2 acres (Proposed Project). Occupants are unknown at the time the Draft SEIR was circulated for public review and comments. The Draft SEIR estimated a net new 124 daily truck trips with an average truck trip length of 60 miles for heavy trucks and 16.6 miles for passenger car trips¹. Based on a review of aerial photographs, SCAQMD staff found that the Proposed Project is surrounded by vacant, agricultural, and industrial uses. Construction is expected to take place in the third quarter of 2019 and be completed in the first quarter of 2020².

SCAQMD Staff's Comments on Air Quality and Health Risk Assessment Analyses

Transport Refrigeration Units (TRUs)

In the Draft SEIR, the Lead Agency incorporated applicable mitigation measures for transport refrigeration units (TRUs) from the prior Final EIRs for the Perris Valley Commerce Center (PVCC) Specific Plan and the Integra Perris Distribution Center (IPDC) for the existing 864,000-square-foot warehouse. For example, one of the applicable PVCC Specific Plan Mitigation Measures (MM Air 12) stated that "[w]here transport refrigeration units (TRUs) are in use, electrical hookups will be installed at all loading and unloading stalls in order to allow TRUs with electric standby capabilities to use them³" (*Emphasis added*). Additionally, one of the applicable IPDC Final EIR Mitigation Measures (MM 2-2) for the existing 864,000-square-foot warehouse stated that "[p]rior to project construction, the project proponent and its contractors shall ensure that any portion of the building designed to accommodate refrigerated storage shall provide electrical connections for a majority of the trailer spaces. Proof of compliance shall be provided to the City of Perris Building Department prior to the issuance of occupancy permits⁴" (*Emphasis added*). However, the Lead Agency stated that operation of the Proposed Project would not require refrigeration in any part of the building⁵ and quantified the Proposed Project's

¹ Draft SEIR. Pages 4.4-8 and 4.8-22.

² *Ibid.* Page 1-4.

³ *Ibid.* Page 1-15.

⁴ *Ibid.* Page 1-16.

⁵ *Ibid.* Page 3-7.

operational emissions and health risks by using the “unrefrigerated warehouse – no rail⁶” or “high-cube transload short-term warehouse without cold storage⁷” land use.

SCAQMD staff is concerned with the analysis. TRUs are commonly in-use at cold storage warehouses. The mitigation measures from prior Final EIRs that were incorporated by reference and applied to the Proposed Project appear to suggest that the Proposed Project would include refrigerated uses. As such, to conservatively analyze the worst-case impact scenario and disclose it in the CEQA document, SCAQMD staff recommends that the Lead Agency revise the air quality and the health risks modeling to calculate operational emissions from NO_x and diesel toxic particulate matter from TRUs and disclose them in the Final SEIR. Alternatively, the Lead Agency should expressly restrict the use of the Proposed Project as a cold storage warehouse in the Final SEIR and make it one of the conditions and restrictions in the Business Development Agreement for the Proposed Project.

Mitigation Measures and Enforceability

CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse impacts. One of the applicable mitigation measures from the PVCC Specific Plan Final EIR (MM Air 6) requires the use of construction equipment that meet or exceed CARB Tier 3 engine standards⁸. To further reduce emissions during construction, SCAQMD staff recommends that the construction contractor(s) use off-road diesel construction equipment that meets or exceeds EPA/CARB Tier 4 emissions standards and will ensure that all construction equipment be tuned and maintained in accordance with the manufacturer’s specifications (*Emphasis added*). To ensure that Tier 4 construction equipment or better will be used during the Proposed Project construction, SCAQMD staff recommends that the Lead Agency include this requirement in applicable bid documents, purchase orders, and contracts. Successful contractor(s) must demonstrate the ability to supply the compliant construction equipment for use prior to any ground disturbing and construction activities. A copy of each unit’s certified tier specification or model year specification and CARB or SCAQMD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment. Additionally, the Lead Agency should require periodic reporting and provision of written construction documents by construction contractor(s) to ensure compliance, and conduct regular inspections to the maximum extent feasible to ensure compliance.

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), SCAQMD staff requests that the Lead Agency provide SCAQMD staff with written responses to all comments contained herein prior to the certification of the Final SEIR. In addition, 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, 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 or useful to decision makers and the public who are interested in the Proposed Project.

SCAQMD staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact me at lsun@aqmd.gov if you have any questions regarding the enclosed comments.

⁶ *Ibid.* Page 4.2-8.

⁷ *Ibid.* Page 4.8-22.

⁸ *Ibid.* Page 4.8-22.

Sincerely,

Lijin Sun

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Planning, Rule Development & Area Sources

LS

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