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Mitigated Negative Declaration (MND) for the Proposed Markham Street Warehouse Project (Proposed Project) Development Plan Review 22-00020

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 CEQA regional air quality impacts analysis for cleanup activities during construction, mobile source health risk assessment analysis, California Emissions Estimator Model analysis, inconsistent project trip generation, and information on South Coast AQMD rules, permits, and responsible agency that the Lead Agency should include in the Final MND.

South Coast AQMD Staff's Summary of Project Information in the MND

Based on the MND, the Lead Agency proposes demolishing the existing onsite structures to construct and operate a warehouse building totaling 89,000 square feet.[1] The Proposed Project is located at 945 and 995 Markham Street within the northwest portion of the City of Perris.[2] The Proposed Project has also combined two separate parcels into one, which is approximately 4.06 acres.[3] The Proposed Project fronts Markham Street with loading docks located south of the building near the southwest corner.[4] The Proposed Project would include ten dock doors[5] associated with 53 truck trips per day[6] and truck access via the western driveway along Markham Street.[7] Based on the ariel photographs, South Coast AQMD staff found that the nearest sensitive receptor (e.g., residences) is approximately 30 feet east of the Proposed Project. The Proposed Project's construction is anticipated to occur in one phase, beginning in the fourth quarter of 2023, and over ten months.[8]

[1] MND. Page 19.
[2] *Ibid*. Page 6.
[3] *Ibid*. Page 19.
[4] *Ibid*. Page 20.
[5] *Ibid*.
[6] *Ibid*. Page 54.
[7] *Ibid*. Page 20.
[8] *Ibid*. Page 21.

South Coast AQMD Staff's Comments on the MND

CEQA Regional Air Quality Impacts Analysis for Cleanup Activities During Construction

Based on Appendix G - Phase I Environmental Site Assessment (ESA) report, it is recommended that "*a limited subsurface investigation should be conducted at the area to the north of the 995 Markham Street steel building in order to determine the presence or absence of soil and/or groundwater contamination due to the historical drum storage and AST at the subject property*."[9] Due to the potential of having contaminated soil and/or groundwater, South Coast AQMD staff encourages the Lead Agency to conduct an investigation as recommended and estimate the amount of contaminated soil and/or groundwater, quantify the emissions associated with the cleanup activities (e.g., hauling trucks, soil remediation, etc.) in addition to the Proposed project's regional construction emissions, compare to the South Coast AQMD air quality significance thresholds[10] to determine the level of significance, and include the results in the Final MND.

Cleanup activities will likely involve using heavy-duty, diesel-fueled trucks for soil export, resulting in emissions from truck hauling activities and vehicle trips by workers that will be required to conduct cleanup activities. Additionally, cleanup activities will likely require the use of additional equipment that may be different from typical equipment for grading and site preparation for construction. If cleanup activities are reasonably foreseeable at the time the MND was prepared, the Lead Agency should use good faith and best efforts to provide information on the scope, types, and duration of cleanup activities, quantify emissions from cleanup activities, and include those emissions in the Proposed Project's construction emissions profile to be compared to South Coast AQMD's air quality CEQA significance thresholds for construction to determine the level of significance in the Final MND. Alternatively, if emissions from cleanup activities are not included in the Final MND, the Lead Agency should include a new air quality mitigation measure in the Air Quality Section of the Final MND to commit to evaluating the potential environmental impacts from cleanup activities through CEQA prior to commencing any cleanup activities. If a new air quality mitigation measure is not included in the Final MND, the Lead Agency should provide reasons supported by substantial evidence in the record to explain why a new air quality mitigation measure is not included.

Based on the emission calculations from the California Emissions Estimator Model (CalEEMod) output files in Appendix A – Air Quality, Energy, Greenhouse Gas Emissions and Health Risk Assessment Impact Analysis, the Lead Agency used the default one-way truck trip length of 20 miles[11] to quantify the Proposed Project's construction emissions from hauling construction materials and importing or exporting soil. If cleanup activities include removing and disposing of contaminated soil, depending on the type of contamination, contaminated soil may not be accepted at the Prosed Project's designated landfill. It may need to be disposed of at a permitted hazardous disposal facility outside Riverside County with a one-way truck trip length that is likely longer than 20 miles. Therefore, South Coast AQMD staff recommends that the Lead Agency identify the permitted hazardous disposal facility that the Proposed Project could use to dispose of

[9] *Ibid*. Appendix G – Phase I Environmental Assessment. Page 28
[10] South Coast AQMD Air Quality Significance Thresholds. Access at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf.
[11] *Ibid*. Appendix A – Air Quality, Energy, Greenhouse Gas Emissions and Health Risk Assessment Impact Analysis. Page 161-163 of PDF.

contaminated soil if the cleanup activities involve transport and off-site disposal of contaminated soil and disclose the information in the Final MND. When quantifying emissions from transportation and off-site disposal, the Proposed Project's construction emissions from haul truck trips for transporting and disposing of contaminated soil should be recalculated based on the appropriate one-way truck trip length. If the default one-way truck trip length of 20 miles is not re-calculated for quantifying emissions from haul truck trips for transporting contaminated soil, the Lead Agency should provide reasons for not re-calculating it supported by substantial evidence in the record.

Mobile Source Health Risk Assessment (HRA) Analysis

Averaging Time Utilized in Construction and Operational HRA Analysis

Based on the construction and operational HRA output files in Appendix A, the averaging time utilized for the analysis is 24 ANNUAL.[12] However, according to the South Coast AQMD Risk Assessment Procedures[13] (v8.1) and South Coast AQMD Modeling Guidance for AERMOD,[14] the detailed HRA utilizing AERMOD should be run using the averaging time PERIOD and 1-hour. Since the construction and operational HRAs of the Proposed Project use ANNUAL as averaging time, South Coast AQMD staff recommend that the Lead Agency re-run the construction and operational HRAs utilizing PERIOD and 1-hour averaging time per guidelines to determine the health risk impacts to the sensitive receptors and off-site workers and include the revised results in the Final MND. If the revision is not included in the Final MND, the Lead Agency should provide reasons for not having them supported by substantial evidence in the record.

California Emissions Estimator Model (CalEEMod) Analysis

Vehicle Trips under Land Use Types

Based on Appendix L – Vehicle Mile Traveled (VMT) and Trip Generation Screening Analysis, the numbers of truck trips per day generated from the Proposed Project are 53.[15] The CalEEMod output files also show that the 53 truck trips per day are analyzed under "unrefrigerated warehouse-no rail," which consists of the Proposed Project trip generation, and 99 passenger cars are under "parking lot" land use types.[16] Figure A below shows the capture of CalEEMod output files analysis.

[12] *Ibid*. Appendix A. Pages 201, 224, 234, 244 of PDF.
[13] South Coast AQMD Risk Assessment Procedures v8.1. Access at: http://www.aqmd.gov/docs/default-source/permitting/rule-1401-risk-assessment/riskassessproc-v8-1.pdf
[14] South Coast AQMD Modeling Guidance for AERMOD. Access at: http://www.aqmd.gov/home/air-quality/meteorological-data/modeling-guidance
[15] *Ibid*. Appendix L - Vehicle Mile Traveled (VMT) and Trip Generation Screening Analysis. Page 5.
[16] *Ibid*. Appendix A. Page 165 of PDF.

Figure A
CalEEMod Output Files Analysis[17]

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday
Unrefrigerated Warehouse-No Rail	53.4	53.4	53.4
Parking Lot	99.0	99.0	99.0

5.9.2. Mitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday
Unrefrigerated Warehouse-No Rail	53.4	53.4	53.4
Parking Lot	99.0	99.0	99.0

However, Appendix A states that "*...In order to account for the longer truck trip length in CalEEMod, the 53 daily truck trips were analyzed under the "Parking Lot" land use, where the trip length was set to 40 miles. For the 99 passenger car daily trips, the trips were analyzed under the "Unrefrigerated Warehouse" land use in CalEEMod....*"[18] This statement is not supporting the CalEEMod output files analysis above and creates confusion for staff while reviewing the MND, appendices, and technical results. Thus, South Coast AQMD staff recommends that the Lead Agency provide an explanation for the inconsistency between CalEEMod output files in Appendix A and Appendix L, revise the information as necessary to ensure consistency throughout the documents to avoid any discrepancies and confusion for reviewers, and include the revision in the Final MND. If the revision is not included in the Final MND, the Lead Agency should provide reasons for not having them supported by substantial evidence in the record.

In addition, switching land use types for trucks and passenger cars is unnecessary as CalEEMod allows users to modify the trip lengths to match the project description. Hence, the truck trips can still be input under "unrefrigerated warehouse-no rail" with adjusted trip length to estimate the emissions associated with the truck trips. As a result, the Lead Agency might consider this option for the analysis revision.

Fleet Mix During Proposed Project's Operation

Table J in Appendix A shows the fleet mix during the Proposed Project's operation, which is captured below for detailed information.

[17] *Ibid*. Appendix A. Page 165 of PDF.
[18] *Ibid*. Appendix A. Page 50.

Figure B
Table J in Appendix A[19]

Table J – Fleet Mix During Operation of Proposed Project

Land Use	LDA	LDT1	LDT2	MDV	LHD2	MHD	HHD	MCY
Unrefrigerated Warehouse No Rail (Passenger Cars)	0.579	0.060	0.186	0.149	0	0	0	0.026
Parking Lot (Trucks)	0	0	0	0	0.170	0.208	0.622	0

Notes:
LDA = Light Duty Auto; LDT1 = Light-Duty Trucks (less than 3,750 pounds gross vehicle weight rating [GVWR]); LDT2 = Light-Duty Trucks (3,751 to 6,000 pounds GVWR); MDV = Medium-Duty Trucks (6,000 to 8,500 pounds GVWR); LHD2 = Light-Heavy-Duty Trucks 2 (GVWR 10,001 to 14,000 pounds); MHD = Medium-Heavy-Duty Trucks (GVWR 19,501 to 33,000 pounds); HHD = Heavy-Heavy-Duty Trucks (GVWR 33,000+ pounds); and MCY = motorcycles.
[1] The Parking Lot Truck fleet mix was based on the Truck Fleet Mix provided in the Traffic Analysis (EPD Solutions, Inc., 2022), with 2-axle trucks analyzed as LHD2, 3-axle trucks analyzed as MHD, and 4+-axle trucks analyzed as HHD.

Based on Table J in Appendix A, the total fleet mix percentage of passenger cars and trucks are 200%, which is not the vehicle mix presented in Appendix L. Appendix L in the MND discusses the ITE vehicle mix in Table 1: Proposed Trip Generation with 64.9% passenger trips and 35.1% truck trips daily,[20] a total of 100%. Hence, South Coast AQMD staff re-calculates the trucks' fleet mix based on the Proposed Trip Generation and finds the information below.

Table A
Truck Fleet Mix

ITE Vehicle Mix[21]		
Passenger (64.9% Daily) Truck (35.1% Daily)		
Truck Types	**Appendix L[22]**	**South Coast AQMD Staff's Calculation[23]**
2-axle	16.70%	6.0%
3-axle	20.70%	7.0%
4+axle	62.50%	22.0%
	100%	35%

South Coast AQMD staff's calculation is comparable to the truck vehicle mix of the Proposed Project, which is 35%. On the other hand, Appendix L fleet mix shows 100% truck that does not match the truck vehicle mix. It is possible that the truck type percentages were used in the fleet mix for the analysis. Hence, South Coast AQMD staff recommends that the Lead Agency provide an explanation of how the fleet mix values in Appendix L are used and revise, as necessary, the fleet mix calculation in CalEEMod with the correct values and include the revised calculations in the Final MND. If the revision is not included in the Final MND, the Lead Agency should provide reasons for not having them supported by substantial evidence in the record.

[19] *Ibid.* Appendix A. Pages 51.
[20] *Ibid.* Appendix L. Page 5.
[21] *Ibid.* Appendix L. Page 5.
[22] *Ibid.* Appendix L. Page 5.
[23] Calculations are based on Appendix L. Page 5.

Inconsistent Project Trip Generation

While comparing the Proposed Project trip generation information from Appendix L and Appendix A, South Coast AQMD staff finds inconsistencies between the two appendices regarding the number of trucks. Table B below shows the discrepancies throughout the documents.

Table B
PCE Trip Generation Discrepancies

Truck Types	Appendix L[24] (Page 5)	Appendix A[25] (Page 50)	Appendix A[26] (Page 59)
2-axle	13	13	19
3-axle	22	22	26
4+axle	100	100	69

South Coast AQMD staff recommends that the Lead Agency verify the number of trucks for each truck type, revise the information, and include the revision in the Final MND to be consistent and avoid any discrepancies in the Final MND and its appendices. If the verification and revision are not included in the Final MND, the Lead Agency should provide reasons for not having them supported by substantial evidence in the record.

South Coast AQMD Rules, Permits, and Responsible Agency

As mentioned in Appendix A of the MND, the Proposed Project would require the installation of a diesel-powered fire pump for the operation;[27] thus, a permit from South Coast AQMD is required. In addition, if the cleanup activities at the Proposed Project site require the use of stationary equipment, permits from South Coast AQMD are also required unless a written permit is not required.[28] The Lead Agency should use good faith effort to include a discussion of equipment that will require South Coast AQMD permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project in the Final MND.

In the event that contaminated soil is identified with the presence of VOCs in soil, requirements of South Coast AQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil[29] will apply and should be discussed in the Final MND. If any activities involve using equipment that either emits or controls air pollution, the Lead Agency should consult with South Coast AQMD staff to determine whether or not permits or plans are required and approved by South Coast AQMD prior to the operation and to identify if any other South Coast AQMD Rules, such as Rule 431.2 – Sulfur Content of Liquid Fuels[30] and Rule 1110.2 – Emissions from Gaseous

[24] *Ibid.* Appendix L. Page 5.
[25] *Ibid.* Appendix A. Pages 50.
[26] *Ibid.* Appendix A. Pages 59.
[27] *Ibid.* Appendix A. Pages 52.
[28] South Coast AQMD. Rule 219. Accessed at: http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/Rule-219.pdf.
[29] South Coast AQMD. Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil. Accessed at: http://www.aqmd.gov/docs/default-source/rule book/reg-xi/rule-1166.pdf.
[30] South Coast AQMD. Rule 431.2 – Sulfur Content of Liquid Fuels. Accessed at: http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-431-2.pdf.

and Liquid-Fueled Engines[31], will be applicable and discussed in the Final MND. Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 or visit South Coast AQMD's web page for more general information on permits: http://www.aqmd.gov/home/permits.

Conclusion

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, responses should provide sufficient details 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 do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision-makers and 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 Danica Nguyen, Air Quality Specialist, at dnguyen1@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

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Planning, Rule Development & Implementation

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Control Number

[31] South Coast AQMD. Rule 1110.2 – Emissions from Gaseous- and Liquid-Fueled Engines. Accessed at: http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1110-2.pdf.