



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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**Mitigated Negative Declaration (MND) for the Proposed
Harley Knox Boulevard Industrial Project
Development Plan Review No. DPR 21-00008 (Proposed Project)**

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, project trip generations information, health risk assessment during operation, and information about South Coast AQMD permits 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 developing one 142,995-square-foot non-refrigerated warehouse with 25 dock doors within 6.93 gross acres of vacant land.¹ The Proposed Project also includes approximately 0.22 acres for street improvements and dedication along Las Palmas Avenue.² The Proposed Project is situated on the north side of Harley Knox Boulevard, south of the Perris Valley Channel, east of North Perris Boulevard, and west of Las Palmas Avenue.³ The site address is 150 Harley Knox Boulevard.⁴ The Proposed Project is located within the Perris Valley Commerce Center Specific Plan (PVCCSP) planning area of the City of Perris and is designated as a light industrial zone.⁵ Based on the ariel photographs, South Coast AQMD staff found that the nearest sensitive receptor (residence) is within 150 feet east of the Proposed Project. The Proposed Project's construction is anticipated to occur in one phase, beginning in the second quarter of 2023, and lasting approximately eight months.⁶ The Proposed Project's operations are anticipated to start in the second quarter of 2024.⁷

¹ MND. Page 1.

² *Ibid.* Page 5.

³ *Ibid.* Page 1

⁴ *Ibid.*

⁵ *Ibid.* Page 11.

⁶ *Ibid.* Page 15.

⁷ *Ibid.*

South Coast AQMD Staff's Comments on the MND*Cumulative Impacts during Operation*

As mentioned in the MND, the Proposed Project site is on six vacant parcels that will be consolidated into one parcel within the Perris Valley Commerce Center Specific Plan (PVCCSP) planning area.⁸ The PVCCSP was adopted by the City of Perris pursuant to a certified Environmental Impact Report (EIR) on 1/10/2012.⁹ Prior to certification of the PVCCSP, a Draft EIR was released for public review and comment between 7/20/2011 – 9/6/2011.¹⁰ 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, 2022.¹¹ However, the cumulative impacts from the revised projects in PVCCSP are not updated, and a robust analysis of cumulative air quality and air toxics impacts from all the projects in PVCCSP is not included in the PVCCSP or this MND.

According to the City of Perris webpage under Planning – Environmental Documents for Public Review,¹² another development project are located 650 feet east of the Proposed Project (the vacant lot on the east side of the Proposed Project - refer to Figure A below). This project is the Final Initial Study/Mitigated Negative Declaration (IS/MND) for the First Harley Knox Industrial Project¹³ (February 2022). In addition, based on the aerial photographs, there are other existing distribution warehouses nearby the Proposed Project. 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 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 MND.

⁸ *Ibid.* Page 8.

⁹ ORDINANCE NUMBER 1284.

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

¹⁰ 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>

¹¹ Perris Valley Commerce Center Specific Plan Amendment No. 12, approved January 11, 2022, available at

<https://www.cityofperris.org/home/showpublisheddocument/2647/637799977032200000>

¹² City of Perris. Planning – Environmental Documents. Access at: <https://www.cityofperris.org/departments/development-services/planning/environmental-documents-for-public-review>.

¹³ First Harley Knox Industrial Project. Access at: <https://www.cityofperris.org/departments/development-services/planning/environmental-documents-for-public-review/-folder-300>.



Figure A: Site Location – Ariel View¹⁴

Project Trip Generations Information

In the Air Quality Section of the MND, the Lead Agency mentions that the Proposed Project has 25 dock doors that generate 67 truck trips per day.¹⁵ These truck trips are matched with the truck trip generations from Table 1 of Appendix I-2 Transportation Study and Vehicle Miles Traveled (VMT) Screening Assessment.¹⁶ However, the number of truck trips generated from the Proposed Project differs in Appendix A – Air Quality, Global Climate Change, Health Risk Assessment, and Energy Impact Analysis.¹⁷ The number of daily truck trips stated in Appendix A is 86.¹⁸ South Coast AQMD staff recommend that the Lead Agency revise Appendix A and the MND to reflect the correct and consistent truck trips per day generated from the proposed Project and include them in the Final MND. If the revision is not included in the Final MND, the Lead Agency should provide reasons for not having it supported by substantial evidence in the record.

Health Risk Assessment during Operation

In the Air Quality Section of the MND, the Lead Agency discusses the most recent Health Risk Assessment (HRA) for Proposed Land Use Projects, prepared by CAPCOA in July 2009 as “*recommends avoiding siting new sensitive land uses within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units (TRUs) per day, or where TRU unit operations exceed 300 hours per week).*”¹⁹ The above statement is meant for advisory recommendations on siting new sensitive land uses

¹⁴ *Ibid.* Page 20.

¹⁵ *Ibid.* Page 51.

¹⁶ *Ibid.* Appendix I-2. Page 5 of PDF.

¹⁷ *Ibid.* Appendix A. Page 42.

¹⁸ *Ibid.*

¹⁹ *Ibid.* Page 50

(e.g., residences, schools) near distribution centers and other land use types. The Lead Agency may misunderstand the above advisory recommendations from CARB Air Quality and Land Use Handbook because the Proposed Project is a distribution facility, and no new sensitive receptors are sitting near the Project site. Therefore, not including an HRA based on the above statement is misused and is not reasonably explained.

In addition, the Lead Agency also discusses the PVCCSP EIR mitigation measure MM Air 15, which “*requires facility-specific HRA for development projects within the PVCCSP planning area that include an excess of 10 dock doors for a single building, a minimum of 100 truck trips per day, 40 truck trips with TRUs per day, or TRU operations exceeding 300 hours per week, and that are subject to CEQA and are located adjacent to sensitive land uses.*”²⁰ The proposed Project has 25 dock doors²¹ that meet the requirements stated in the MM Air 15, and the residence is within 150 feet east of the Proposed Project (refer to Figure A). Therefore, South Coast AQMD staff recommend that the Lead Agency perform the operational HRA, including truck routes, to determine the cancer risk impacts from the Proposed Project’s operation, compare to South Coast AQMD Toxic Air Contaminants Significance Thresholds,²² and include the HRA results in the Final MND. If the operational HRA and its results are not included in the Final MND, the Lead Agency should provide reasons for not having it supported by substantial evidence in the record.

South Coast AQMD Permits and Responsible Agency

If the implementation of the Proposed Project would require the use of new stationary equipment, such as emergency generators, fire pumps, etc., permits from South Coast AQMD are required. The Final MND 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 MND 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 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.

²⁰ *Ibid.* Page 51.

²¹ *Ibid.* Page 1.

²² South Coast AQMD Toxic Air Contaminants Significance Thresholds. Access at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>.

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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Program Supervisor, CEQA-IGR

Planning, Rule Development & Implementation

SW:DN

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