



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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Draft Environmental Impact Report (Draft EIR) for the First March Logistics Project
(Proposed Project)
(State Clearinghouse Number: 2021120497)

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 include recommended revisions to the operational emissions from stationary and portable sources and specifying the type and nature of manufacturing activities, Localized Significant Thresholds (LSTs) for operational emissions analysis, health risk assessment during operation, cumulative impacts during project operation, and information about South Coast AQMD air permits that the Lead Agency should include in the Revised Draft EIR or the Final EIR.

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

Based on the project description in the Draft EIR, the Lead Agency proposes construction of two warehouse buildings totaling 559,005 square feet (sf) on 27.26 acres.¹ The Project consists of a single 419,032 sf warehouse building (Building 1) and a second 125,341 sf warehouse building (Building 2). The buildings would allow for either high-cube, non-refrigerated warehouse/distribution, or manufacturing uses. The Proposed Project is situated near the northeast corner of Interstate 215 and Nandina Avenue.² After reviewing the aerial photographs, South Coast AQMD staff has found that the nearest sensitive receptor (e.g., adult care center) is located 1613 feet south of the Proposed Project. The Proposed Project consists of two phases: Phase 1 (Building 1) is expected to be constructed by 2023, and Phase 2 (Building 2) is anticipated to be constructed by 2025.³

South Coast AQMD Staff's Comments on the Draft EIR

Operational Emissions from Stationary and Portable Sources

¹ Draft EIR, p. 1-2.

² Ibid. p. 1-2.

³ Ibid. p. 1-2.

The Draft EIR indicates that the proposed buildings are designed to accommodate high-cube, non-refrigerated warehouse/distribution, or manufacturing purposes, with a specific emphasis on excluding any chemical processing or hazardous material assembly. However, to ensure a thorough understanding, it is crucial for the Draft EIR to clarify the specific nature of the intended manufacturing activities and provide detailed information regarding the operational emissions associated with each manufacturing type.

In addition, upon careful examination of Table 3-8 in the Appendix B1_Air Quality Impact Analysis document,⁴ it has come to our attention that a row of data pertaining to On-site Equipment Source is included while the corresponding data for stationary sources is noticeably absent in the CalEEMod output files.⁵ This discrepancy raises the need of further clarification and supporting documentation from the Lead Agency regarding the information presented in Table 3-8. Moreover, it is strongly recommended that the Lead Agency conduct a thorough review and revision of the CalEEMod calculations, taking into account both on-site and off-site equipment that will be utilized throughout the operation of the Proposed Project. By incorporating these revisions, the Final EIR will provide a comprehensive and reliable assessment, presenting consistent and conservative emissions data, thus avoiding any discrepancies.

Overlapping Construction and Operational Impacts

Based on the review of the Air Quality Analysis, the Lead Agency have conducted a scenario where construction emissions overlap with operational emissions.⁶ However, the combined construction emissions with operational emissions from the overlapping years have been compared to South Coast AQMD's regional air quality CEQA thresholds for construction.⁷ To conservatively analyze a worst-case impact scenario, the South Coast AQMD staff recommends that the combined emissions from the overlapping construction and operational activities should be combined and compared to South Coast AQMD's regional air quality CEQA thresholds for operation to determine the level of significance in the Final EIR. By doing so, the Lead Agency will gain valuable insights into the level of significance associated with the project's impact on air quality, enabling them to make well-informed decisions.

Localized Significant Thresholds (LSTs) Analysis for Construction and Operational Activities

The Draft EIR contains a LST analysis of localized air quality construction and operation impacts to sensitive receptors in the vicinity of the Proposed Project as presented in Appendix B1 – Air Quality Impact Analysis, Table 3-10 - Onsite Construction Emissions and Table 3-12- Onsite Operation Emissions.⁸ The localized emissions were determined by relying on the Mass Rate LST Look-up Tables developed by South Coast AQMD.⁹ However, based on aerial maps provided in the Draft EIR, the footprint of the Proposed Project spans approximately 27.26 acres,

⁴ Appendix B1_Air Quality Impact Analysis, p. 52.

⁵ Ibid. p. 314.

⁶ Ibid. p. 53.

⁷ Ibid. p. 54.

⁸ Ibid. p. 61 and p. 63.

⁹ South Coast AQMD, Mass Rate LST Look-up Tables: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-lst-look-up-tables.pdf>

which is substantially larger than the allowed maximum footprint of five-acres in the Mass Rate LST Look-up Tables. To remedy these inconsistencies, a re-evaluation of the localized air quality impacts from construction and operational emissions using air dispersion modeling, in lieu of relying on the Mass Rate LST Look-up Tables, is more appropriate for accurately predicting the ground-level concentrations needed for the LST analysis because air dispersion modeling takes into account project-specific factors such as: 1) the total acreage to be disturbed; 2) building downwash effects; 3) emissions and location of expected mobile sources, permitted sources, and other sources on-site. Moreover, Since the lead agency have declared that there will be an Overlap construction and operational emissions need to be compared to the LST thresholds, in other words, Air quality Impact from the overlap activities emissions need to be compared to LST thresholds.

Therefore, South Coast AQMD staff recommends that the Lead Agency revise the LST analyses for project construction and operation by conducting air dispersion modeling and including the results of this analysis in either a Revised Draft EIR or Final EIR. If a revised LST analysis is not included in the Revised Draft EIR or Final EIR, the Lead Agency should provide reasons supported by substantial evidence in the record to explain why.

Health Risk Assessment (HRA) -

Averaging Time Utilized in Construction and Operational HRA Analysis:

Based on the construction and operational HRA modeling files, the averaging time for the analysis is ANNUAL in AERMOD.¹⁰ However, according to the South Coast AQMD Risk Assessment Procedures v8.1¹¹ and South Coast AQMD Modeling Guidance for AERMOD,¹² the detailed HRA utilizing AERMOD should be run using the averaging time PERIOD. Since the construction and operational HRAs of the Proposed Project using ANNUAL, South Coast AQMD staff recommend that the Lead Agency re-run the construction and operational HRAs utilizing PERIOD averaging time to determine the health risk impacts to the sensitive receptors and off-site workers and include the revised results in the Final EIR. If the revision is not included in the Final EIR, the Lead Agency should provide reasons for not having them supported by substantial evidence in the record.

Stationary Sources Used During Operation

In addition, it needs to be clarified in the Final EIR if the stationary combustion engines (e.g., diesel firewater pump, diesel emergency generator, etc.) will be used on-site during operation. If any of these are used when implementing the Proposed Project, they will need to be added as additional sources to the HRA and dispersion modeling files. Therefore, South Coast AQMD staff recommend that the Lead Agency revise the operational HRA modeling by incorporating the above recommendations and including the HRA results in the Final EIR. If the HRA

¹⁰ 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>

¹¹ 11 South Coast AQMD Modeling Guidance for AERMOD. Access at:

[South Coast AQMD Modeling Guidance for AERMOD](#)

¹² ORDINANCE NUMBER 1284. Accessed here:

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

modeling is not revised and included in the Final EIR, the Lead Agency should provide reasons supported by substantial evidence in the record to explain why the revision is not included.

Cumulative Impacts during Project Operation

The Proposed Project is located within the Perris Valley Commerce Center Specific Plan (PVCCSP) planning area. The PVCCSP was approved pursuant to a certified Environmental Impact Report (EIR) on 1/10/2012.¹³ Prior to certification of the PVCCSP, a Draft EIR was released for public review and comment between 7/20/2011 – 9/6/2011.¹⁴ During this public review period the South Coast AQMD submitted a comment recommending the Lead Agency include a more robust analysis of cumulative impacts in the Final EIR. 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, 2022.¹⁵ 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 Draft EIR. 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 to perform a qualitative analysis to provide the potential cumulative impacts from air toxics in consideration and listing of all surrounding past, present, and future probable projects. The Lead Agency may also perform a more detailed and robust quantitative analysis of cumulative air toxics and potential health risk implications to be included in the Final Draft EIR.

South Coast AQMD Air Permits and Responsible Agency Role

If construction of the Proposed Project requires using the new stationary and portable sources, including but not limited to emergency generators, fire water pumps, boilers, spray booths, and etc., air permits from South Coast AQMD will be required. The Revised Draft EIR or Final EIR should include a discussion on stationary and portable 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 and portable sources in the Revised Draft EIR or the Final EIR 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 relative to air permits. General information on air permits is also available on South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>.

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), the Lead Agency is required to provide South Coast AQMD written responses to all

¹³ ORDINANCE NUMBER 1284. Accessed here:

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

¹⁴ Final EIR. 9.0 Introduction, Public Review Summary. Page 9.0-1 Accessed here:

<https://www.cityofperris.org/home/showpublisheddocument/2645/637455522835370000>

¹⁵ Perris Valley Commerce Center Specific Plan Amendment No. 12, approved January 11, 2022, available at:

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

comments contained herein at least 10 days prior to certifying the Revised Draft EIR or the Final EIR. In addition, as provided by CEQA Guidelines Section 15088(c), if the Lead Agency's position is at variance with the recommendations provided in this comment letter, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided.

We appreciate the opportunity to review the Proposed Project. Thank you for considering these comments. 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 Sahar Ghadimi, Air Quality Specialist, at sghadimi@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

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Planning, Rule Development & Implementation

SW:SG

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