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Draft Environmental Impact Report (EIR) for OLC3 Ramona Expressway and Perris Boulevard Commercial Warehouse Project (Proposed Project) (SCH No. 2023040385)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to review the above-mentioned document. The City of Perris is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff has provided the following brief summary of project information and prepared the following comments which are organized by topic of concern.

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

Based on the Draft EIR, the Proposed Project consists of construction and operation of warehouse and commercial buildings on an approximately 46-acre site.[1] Specifically the Proposed Project would include:

- One non-refrigerated 774,419 square foot (sq ft) high-cube fulfillment center warehouse building on approximately 36 acres[2] with 144 loading dock doors[3] which is expected to attract 294 one-way truck trips per day[4]
- 70,000 sq ft of retail and restaurant uses on approximately 9.5[5] acres comprised of
    - 30,825 sq ft of Strip Retail Plaza
    - 5,000 sq ft of High Turnover Restaurant (sit-down)
    - 23,775 sq ft of Fast-Food Restaurant without Drive-Through Window use
    - 10,400 sq ft of Fast-Food Restaurant with Drive-Through Window use.[6]

Based on a review of aerial photographs, South Coast AQMD staff found that the nearest sensitive receptor (Recreational Vehicle park) is located approximately 175 feet southeast of the Proposed Project site. Construction of the Proposed Project is anticipated to occur in a single phase, commence in January 2023, and be completed by April 2024.[7] The Proposed Project is

[1] Draft EIR. 1.0 Executive Summary. Page 1-1 through 1-3.
[2] *Ibid*. 3.0 Project Description. Page 3-7.
[3] *Ibid*. 3.0 Project Description. Page 3-9 through 3-10.
[4] *Ibid*. 4.2 Air Quality. Page 4.2-34.
[5] *Ibid*. 1.0 Executive Summary. South Coast AQMD Staff calculated 9.5 acres. 4.7 acres (commercial portion to the south of proposed warehouse building) + 4.8 acres (commercial portion to the west of proposed warehouse building) = 9.5 acres. Page 1-3.
[6] *Ibid*. Appendix B, Air Quality Impact Analysis. Page 14.
[7] *Ibid*. Appendix B, Air Quality Impact Analysis, Table 3-3: Construction Duration. Page 50.

located on the southeast corner of North Perris Boulevard and Perry Street in the City of Perris, Riverside County.[8]

South Coast AQMD Staff's Comments

Potential Underestimation of Emissions Due to Inaccurate On-site Distance for Trucks During Project Operation

The Draft EIR notes that CalEEMod Version 2022.1 lacks the capacity to distinguish between on-site and off-site mobile source emissions during operation.[9] The Draft EIR then states that the longest on-site distance a truck or passenger car can traverse the Proposed Project site during operation is approximately .50 miles[10] and that the Draft EIR relies on this distance for the Localized Significance Threshold (LST) analysis. Staff, however, reviewed two different site maps (Figure 4.2-2 in the Draft EIR[11] and Exhibit 2-B in Appendix C of the Draft EIR[12]) that show on-site truck movement routes for the Proposed Project and concluded that the longest possible on-site distance for the truck routes is between, roughly, .55 to 1 mile and thus exceeds the 0.5-mile assumption upon which the Draft EIR LST emission estimates are based. Therefore, the on-site emissions appear to have been underestimated. For this reason, staff recommends the Lead Agency either revise the calculations to reflect an on-site truck route distance of somewhere between .55 to 1 mile or provide a comprehensive explanation and justification of the methodology employed in relying on the 0.5-mile on-site assumption parameter. If during this stage in the planning process the exact on-site truck route is unknown (two different on-site truck routes for the Proposed Project are presented in the Draft EIR and its accompanying appendices), South Coast AQMD staff recommend the Lead Agency use the most conservative hypothetical on-site truck route length for the air quality impact analysis.

Use of South Coast AQMD's Mass Rate Localized Significance Threshold (LST) Look-Up Table to Analyze the Proposed Project's Localized Air Quality Impact is not Consistent with Guidance for the LST Methodology

The Proposed Project covers approximately 46 acres.[13] The Draft EIR states that during construction up to 20 acres/day can be actively disturbed.[14] The Lead Agency uses South Coast AQMD's Mass Rate LST Look-up Table[15] for five acres as a screening tool to determine if the Proposed Project's construction and operational daily emissions of NOx, CO, PM10 and PM2.5 could result in a significant impact to local air quality.[16] South Coast AQMD staff, however, developed the LST methodology for proposed projects that are less than or equal to five acres.[17]

[8] Draft EIR. Appendix B. Air Quality Impact Analysis, Exhibit 1-A: Location Map. Page 15.
[9] *Ibid*. Appendix B. Air Quality Impact Analysis. Page 61.
[10] *Ibid*. Appendix B. Air Quality Impact Analysis. Page 61.
[11] *Ibid*. Air Quality, Figure 4.2-3: Modeled On-Site Emission Sources. Page 4.2-32.
[12] *Ibid*. Appendix C. Health Risk Assessment, Exhibit 2-B: Modeled On-Site Emission Sources. Page 15.
[13] *Ibid.* 1.0 Executive Summary. Page 1-1 through 1-3.
[14] *Ibid*. Appendix B. Air Quality Impact Analysis. Page 56 through 57.
[15] South Coast AQMD Appendix C – Mass Rate LST Look-up Table. Access here: http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-lst-look-up-tables.pdf
[16] *Ibid*. Appendix B. Air Quality Impact Analysis. Page 55 through 62.
[17] Final LST Methodology, July 2008. Page 1-1, 3-3, & 3-4. Access here: http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf

For projects that are greater than five acres in size, South Coast AQMD recommends lead agencies perform project-specific dispersion modeling to determine operational localized air quality impacts.[18] For construction, if project sites are greater than five acres in size and disturb more than five acres/day during the construction phase, staff also recommends lead agencies perform project-specific dispersion modeling to determine construction localized air quality impacts. Staff therefore recommends the Lead Agency to: 1) perform project-specific air dispersion modeling for the Proposed Project's construction and operational phase emissions to determine localized air quality impacts; and 2) include the results in the Final EIR.

Potential Underestimation of Emissions Due to Imprecise Assumptions for Truck Trip Lengths and Trip Rates in Emissions Analysis

Appendix B of the Draft EIR explains that the air quality impact analysis is based on the assumption that the average truck trip length is 34.51 miles for the High-Cube Fulfillment Center Warehouse land use.[19] Appendix B discusses the assumptions used to arrive at the 34.51-mile modeling parameter and states that, "the analysis incorporated the SCAQMD recommended truck trip length of 14.2 miles for 2-axle and 3-axle (LHDT1, LHDT2, and MHDT) trucks and 40 miles for 4+-axle (HHDT) trucks and weighting the average trip lengths using traffic trip percentages taken from the *OLC3 Traffic Analysis*. The trip length function for the proposed industrial building use has been revised to 34.51 miles..."[20] The referenced 14.2 miles and 40 miles of truck trip lengths were originally derived from the Southern California Association of Government's (SCAG) estimation of average truck trip length in its 2016 Regional Transportation Plan.[21]

The Draft EIR's Transportation section also states that the Proposed Project's truck distribution patterns are based partially on the Project Applicant's input on percentage of traffic oriented to the Port of Long Beach or other destination.[22] Yet the project site is located approximately 80 miles from the Ports of Long Beach and Los Angeles, which means that the air quality analysis underestimated the emissions from trucks traveling from the Ports to the project site. For this reason, the Lead Agency is recommended to revise the calculations in the Final EIR by taking a project-specific approach to the vehicle trip length and trip rates by applying more conservative trip lengths such as designating 40 miles for local trips and 80 miles for Port-related trips. Tailoring these parameters and assumptions to be based on project-specific data will ensure a more accurate assessment of emissions, accounting for the unique circumstances and logistical realities of the Proposed Project.

Incorrect Pollutant Averaging Time in Health Risk Assessment (HRA)

[18] Final LST Methodology, July 2008. Page 1-1, 3-3, & 3-4. Accessed here: http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf
[19] Draft EIR. Appendix B. Air Quality Impact Analysis. Page 53.
[20] *Ibid*. Appendix B. Air Quality Impact Analysis. Page 53.
[21] South Coast Air Quality Management District, Preliminary Draft Staff Report: Proposed Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce.
[22] *Ibid*. 4.12 Transportation. Page 4.12-23.

South Coast AQMD staff reviewed the construction HRA modeling files and noted that the ANNUAL[23] keyword was selected for the pollutant averaging time in the control pathway in the AERMOD model. However, according to the South Coast AQMD Risk Assessment Procedures v8.1 and South Coast AQMD Modeling Guidance for AERMOD,[24] a detailed HRA utilizing AERMOD should be ran using the pollutant averaging time option of PERIOD. Thus, staff recommends the Lead Agency: 1) re-run the construction HRA to utilize PERIOD averaging time to determine the health risk impacts to sensitive receptors and off-site workers; and 2) include the results in the Final EIR.

Inconsistent Trip Generation Rates in Draft EIR Traffic Analysis and CalEEMod

Table 4-1 of Appendix S of the Draft EIR shows the following project trip generation rates: [25]

TABLE 4-1: PROJECT TRIP GENERATION RATES

Land Use[1]	Units[2]	ITE LU Code	AM Peak Hour In	AM Peak Hour Out	AM Peak Hour Total	PM Peak Hour In	PM Peak Hour Out	PM Peak Hour Total	Daily
Actual Vehicle Trip Generation Rates									
High-Cube Fulfillment Center Warehouse	TSF	--[3]	0.089	0.033	0.122	0.050	0.115	0.165	2.129
Passenger Cars (AM = 84.4%, PM = 87.3%, Daily = 82.2%)			0.079	0.024	0.103	0.040	0.104	0.144	1.750
2-4 Axle Trucks (AM = 6.6%, PM = 6.7%, Daily = 7.6%)			0.004	0.004	0.008	0.005	0.006	0.011	0.162
5+-Axle Trucks (AM = 9.0%, PM = 6.0%, Daily = 10.2%)			0.005	0.006	0.011	0.005	0.005	0.010	0.217
Strip Retail Plaza (<40,000 SF)	TSF	822	1.42	0.94	2.36	3.30	3.29	6.59	54.45
High Turnover (Sit-Down) Restaurant	TSF	932	5.26	4.31	9.57	5.52	3.53	9.05	107.20
Fast Food w/o Drive Thru	TSF	933	25.04	18.14	43.18	16.61	16.60	33.21	450.49
Fast Food w/ Drive Thru	TSF	934	22.75	21.86	44.61	17.18	15.85	33.03	467.48
Passenger Car Equivalent (PCE) Trip Generation Rates[4]									
High-Cube Fulfillment Center Warehouse	TSF	--[3]	0.089	0.033	0.122	0.050	0.115	0.165	2.129
Passenger Cars			0.079	0.024	0.103	0.040	0.104	0.144	1.750
2-4 Axle Trucks (PCE = 2.0)			0.008	0.008	0.016	0.010	0.012	0.022	0.324
5+-Axle Trucks (PCE = 3.0)			0.016	0.017	0.033	0.014	0.016	0.030	0.651

[1] Trip Generation Source: Institute of Transportation Engineers (ITE), Trip Generation Manual, Eleventh Edition (2021).

[2] TSF = thousand square feet

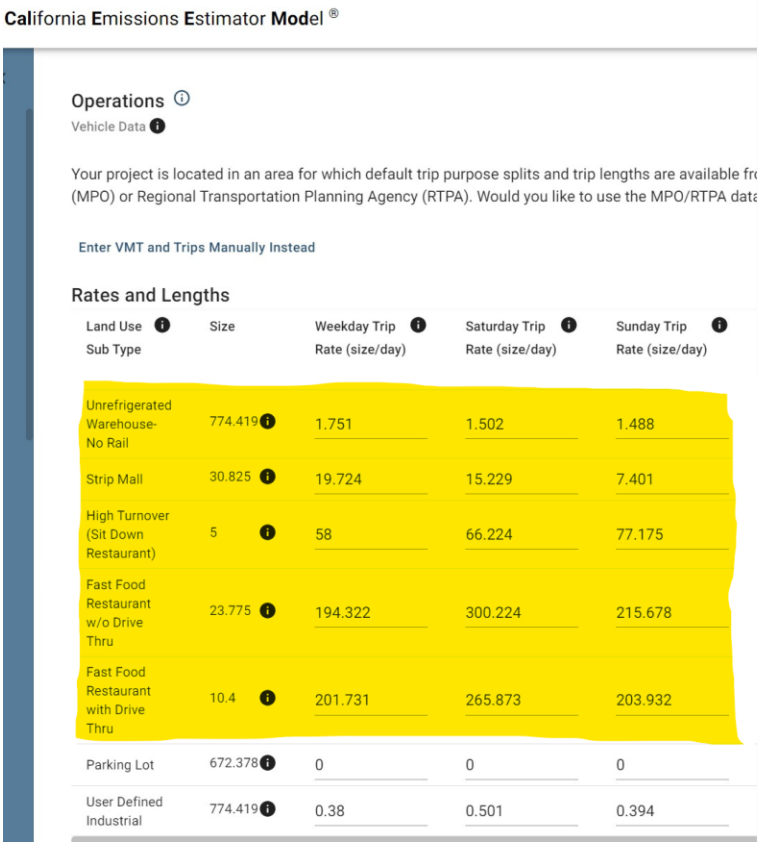
[3] Vehicle Mix Source: High Cube Warehouse Trip Generation Study, WSP, January 29, 2019.
Inbound and outbound split source: ITE Trip Generation Manual, Eleventh Edition (2021) for ITE Land Use Code 154.

[4] PCE factors: 2 and 3-axle = 2.0; 4+-axle = 3.0.

Based on a review of the CalEEMod technical files provided to South Coast AQMD staff via e-mail (Haseeb Qureshi, personal communication, October 4, 2023), it appears that the trip generation rates shown in table 4-1 above and the trip generation rates in the CalEEMod input modeling files for the operational phase (see Figure 1 below), do not match.

[23] 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
[24] South Coast AQMD Modeling Guidance for AERMOD. Access at: South Coast AQMD Modeling Guidance for AERMOD
[25] *Ibid.* Appendix S. Traffic Analysis. Page 51.

Figure 1



For instance, the Strip Retail Plaza Land Use in Table 4-1 shows a daily trip generation rate of 54.45, while the CalEEMod input modeling files (see Figure 1 above) show a daily trip generation rate of 19.724 (17.32 if Weekday, Saturday, and Sunday Trip Rates are averaged[26]). South Coast AQMD staff therefore recommends the Lead Agency to: 1) review and revise the Proposed Project's Operational Trip Generation Rates; 2) re-calculate the emissions; and 3) include the results in the Final EIR.

Recommended Revision to Mitigation Measure (MM) for Operation

The air quality analysis in the Draft EIR concludes that the Proposed Project's regional operational emissions for volatile organic compounds (VOC), nitrogen oxides (NOx), and carbon monoxide (CO) would be significant even after mitigation.[27] The Draft EIR also states that the majority of the Proposed Project's VOC, NOx, and CO operational emissions come from mobile sources.[28] Once in operation, the Proposed Project is anticipated to result in approximately 294 one-way truck trips per day.[29] CEQA also requires that all feasible MMs that go beyond what is required by law be utilized to minimize or eliminate any significant adverse air quality impacts. Thus, to further reduce the Proposed Project's air quality impacts for operation, staff

[26] [(19.724)*5 + 15.229 + 7.401]/7 = 17.321 Average weekly trip rate based on CalEEMod technical file trip rate numbers
[27] Draft EIR. 4.2 Air Quality. Page 4.2-22 through 4.2-26.
[28] *Ibid*. 4.2 Air Quality. Page 4.2-22 through 4.2-23.
[29] *Ibid*. 4.2Air Quality. Page 4.2-34.

recommends that the Lead Agency consider revising its air quality (AQ) MM, MM AQ-6,[30] in the Final EIR to further reduce the Proposed Project's significant and unavoidable air quality impacts during operation.

MM AQ-6 states that "the facility operator for the warehouse portion of the [Proposed] Project shall require tenants that do not already operate ***2010*** and newer trucks to apply in good faith for funding to replace/retrofit their trucks, such as Carl Moyer, VIP, Prop 1B, SmartWay Finance…" South Coast AQMD staff recommends that the Lead Agency revise MM AQ-6 so that tenants that use trucks older than ***2014*** model year are encouraged by the developer/successor-in-interest to apply in good-faith for funding for diesel truck replacements.

South Coast AQMD Air Permits and Role as a Responsible Agency

If implementation of the Proposed Project would require the use of new stationary and portable sources, including but not limited to emergency generators, fire water pumps, boilers, etc., air permits from South Coast AQMD will be required and the role of South Coast AQMD would change from a Commenting Agency to a Responsible Agency under CEQA. In addition, if South Coast AQMD is identified as a Responsible Agency, per CEQA Guidelines Section 15086, the Lead Agency is required to consult with South Coast AQMD. Furthermore, CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of evaluating the applications for air permits. For these reasons, the Final EIR should include a discussion about any new stationary and portable equipment requiring South Coast AQMD air permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project.

The Final EIR should also include calculations and analyses for construction and operation emissions for new stationary and portable sources, as this information will also be relied upon as the basis for the permit conditions and emission limits for the air permit(s). Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions regarding what types of equipment would require air permits. For more general information on permits, please visit South Coast AQMD's webpage at: http://www.aqmd.gov/home/permits.

Conclusion

As set forth in California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), the Lead Agency shall evaluate comments from public agencies on the environmental issues and prepare a written response at least 10 days prior to certifying the Final EIR. As such, please provide South Coast AQMD written responses to all comments contained herein at least 10 days prior to the certification of the Final EIR. In addition, as provided by CEQA Guidelines Section 15088(c), if the Lead Agency's position is at variance with 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.

Thank you for the opportunity to provide comments. South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this

[30] Draft EIR. 4.2 Air Quality. Page 4.2-24.

comment letter. Please contact Evelyn Aguilar, Air Quality Specialist, at eaguilar@aqmd.gov should you have any questions.

Sincerely,

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