



South Coast Air Quality Management District

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Final Environmental Impact Report (Final EIR) for the Proposed South Perris Industrial Project

The AQMD appreciates the opportunity to comment on the above-mentioned document. On December 9, 2009, AQMD staff commented on the Draft EIR dated October 2009 (SCH No. 2008071060) and incorporates by reference its comments as applicable for the Final EIR.

AQMD staff is concerned that the lead agency has not adequately considered the cumulative air quality impacts of the large increase in goods movement projects within the Perris area over the past two years. For example, the table below illustrates eight projects totaling over 17.75 million square feet of new warehousing space. The cumulative effect of these projects includes thousands of new on-road diesel truck trips travelling throughout the community each day. The proposed South Perris Industrial project is the largest of these projects, and the single largest warehousing project that AQMD staff has ever reviewed.

Name	Size (MSF)	EIR Date
Oleander Industrial Park	1.2	September 2008 Final
Rider Distribution Center	0.6	April 2009 Final
Markham Business Center	1.75	June 2009 Final
Oakmont II	1.60	June 2009 Draft
Perris Ridge Commerce Center II	2.0	August 2009 Final
Nuevo Business Park Phase II	2.0	December 2009 Final
Rados Distribution Center	1.2	March 2010 Draft
South Perris Industrial	7.4	May 2010 Final

MSF – Million Square Feet

A variety of smaller industries that will be needed to serve this large increase in heavy duty truck traffic may also attract trucks inside the community, including fueling stations, maintenance shops, restaurants, etc. If each of these projects is completed, local diesel emissions will increase substantially, contributing to the NO_x, particulate matter, and

toxic air contaminant burden in the community. In 1998, diesel particulate matter from internal combustion engines was identified as a carcinogen by the California Air Resources Board. AQMD staff therefore recommends that these goods movement related land-use projects be included in the Final EIR in its cumulative analysis. In addition to adding these projects to the cumulative analysis, the AQMD staff recommends that a community-wide health risk assessment be conducted to determine the effects on sensitive receptors and off-site workers from the increased diesel exhaust emissions.

AQMD staff is also concerned that the trip rate used in the Final EIR to estimate on-road air quality and health impacts may substantially underestimate the number of trucks associated with the project. In its calculations, the lead agency changed the default trip rate in the URBEMIS2007 computer model for operational air quality impacts from 4.96 trips per thousand square feet of land use to 1.44 based on the Institute of Transportation Engineers Trip Generation 8th Edition (ITE report). This lower rate of 1.44 is an average based partially on warehouses with rail service and others that are partially vacant. These assumptions are not consistent with the project description at full buildout. In order to avoid underestimating potential air quality impacts, AQMD staff recommends that the lead agency at a minimum use the high end trip rate from the ITE Manual of 2.88 trips per thousand square feet for any warehouse without rail service. For a warehouse with rail service, the 1.44 trip rate is appropriate.

In addition to the lead agency's own measures to limit truck traffic to designated truck routes and parking prohibitions to limit trucks from using residential areas and making repairs on residential streets, the AQMD staff recommends that the lead agency also consider other feasible strategies from the Western Riverside Council of Governments Good Neighbor Guidelines for Siting New and/or Modified Warehouse/Distribution Facilities including providing food options, fueling, truck storage, truck repair, and convenience stores on-site to minimize the need for trucks to traverse through nearby communities.

The lead agency also proposes as an alternative the potential extension of a rail line to service the southernmost warehouse of this project. The lead agency, in its response to AQMD staff comments on the Draft EIR determined that regional emissions of PM and VOCs would increase with this alternative, and emissions of NO_x would decrease. In addition to analyzing regional air quality impacts, localized air quality impacts should also be assessed to evaluate their potential effect on schools (such as Railway Elementary), residences, and other sensitive receptors located adjacent to the rail line.

The AQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please feel free to contact Ian MacMillan, Program Supervisor at (909) 396-3244, if you have any questions regarding these comments.

Brad Eckhardt
Planning Manager

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June 24, 2010

Sincerely,

A handwritten signature in black ink that reads "Ian V. MacMillan". The signature is written in a cursive, slightly slanted style.

Ian MacMillan
Program Supervisor, CEQA Inter-Governmental Review
Planning, Rule Development & Area Sources

SN:IM:GM

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