



# South Coast Air Quality Management District

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Mr. Kenneth Phung, Project Planner  
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## **Draft Environmental Impact Report (DEIR) for the Proposed Optimus Logistics Center I Project (SCH. NO. 2012111003)**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final CEQA document.

The Lead Agency proposes construction of a high-cube logistics warehouse distribution project that would include two buildings totaling 1,455,781 square feet on 68.48 acres. In addition, approximately 220,520 square feet of commercial uses were also modeled for three separate parcels on approximately 7.5 acres of land. The warehouse logistic center site would operate seven days a week, 24 hours a day. Based on recommended guidance from the Institute of Transportation Engineers (ITE),<sup>1</sup> the proposed Project could have as many as 2,459 total daily trips including 937 trucks operating daily at full-project buildout beginning in year 2035. Project trucks would use Patterson Avenue on the northwest portion of the project site with only passenger vehicles allowed access to Webster Avenue, where residences are located just east of the proposed project site. During construction, approximately 146,000 cubic yards of cut and fill will occur that will be balanced on-site. Construction is expected to take approximately 1.5 years to complete starting in 2015.

The SCAQMD staff has concerns about the modeling assumptions used to estimate project operational, localized and health effect impacts. Specifically, the SCAQMD staff recommends using the associated daily truck trip rate from the Institute of Transportation Engineers Manual (ITE Manual) instead of the non-standard truck rate used in the DEIR. The air quality modeling should also be revised in the Final EIR to reflect the Fontana Truck Trip Generation Study fleet mixture percentages cited in the trip generation portion of the Traffic and Circulation Section of the DEIR. In addition, the operational trip lengths used in the air quality and related analyses should reflect the distances the truck

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<sup>1</sup> ITE, 9<sup>th</sup> Edition, Land Use 152 High-Cube Warehouse/Distribution Center 152, Weekday Weighted Average Truck Trip Generation Rate of 0.64 trip ends per 1,000 square feet.

activities will originate from and the distances to the truck destinations described in the project description. There are further comments regarding the localized significance thresholds and health risk assessment assumptions. Finally, the SCAQMD staff recommends that all feasible mitigation measures including a 1,000 foot buffer between the on-site truck activities and nearby sensitive receptors be considered and incorporated into the final Project and Final EIR to reduce these impacts. Additional details are included in the attachment.

Pursuant to Public Resources Code Section 21092.5, SCAQMD staff requests that the Lead Agency provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist CEQA Section, at (909) 396-3302, if you have any questions regarding the enclosed comments.

Sincerely,

*Jillian Baker*

Jillian Baker, Ph.D.  
Program Supervisor  
Planning, Rule Development & Area Sources

Attachment

JB:GM

RVC141128-05  
Control Number

## **Air Quality Analysis - Operations**

### **Daily Truck Trip Rate**

1. In the Air Quality Impact Analysis, the Lead Agency uses the Institute of Transportation Engineers Trip Generation Manual, 9<sup>th</sup> Edition, 2012 (ITE Manual) 1.68 overall trip generation rate (for cars + trucks totally approximately 2,459 daily vehicles) for the proposed Project, but does not use the 0.64 daily truck trip rate from this same reference.<sup>2</sup> Rather, the Trip Generation Rates use a passenger car daily trip rate of 1.337 vehicles per day and a daily truck trip rate of 0.343 truck trips per day.<sup>3</sup> By using the 0.343 daily truck trip rate, trucks are estimated at 499 daily truck trips in the DEIR instead of approximately 937 daily truck trips using the ITE 0.64 daily truck trip rate. Therefore, absent from a specific traffic study of known tenants, the Final EIR should be consistent using the associated ITE truck trip rate to estimate project daily truck trips so that project trips and associated emission and health effect impacts are not underestimated.

### **Vehicle Fleet Mixture Percentages**

2. In the DEIR, the air quality analysis used a 0.343 daily truck trip rate (ITE 1.68 total daily trip rate minus 1.337 passenger vehicle trip rate = 0.343 daily truck trip rate) and truck vehicle fleet mixture percentages from the City of Fontana Truck Trip Generation Study (Fontana Study)<sup>4</sup> to estimate project air quality operational impacts in the CalEEMod modeling. Specifically, the Fontana Study fleet mixture percentages include: 3.46 percent of the total fleet for 2-axle Trucks; 4.64 percent for 3-axle trucks; and 12.33 percent for 4-axle and larger trucks with truck categories totaling 20.43 percent of the total vehicle fleet. Passenger Vehicles would therefore comprise 79.57 percent of total vehicles during operations. However, the 0.343 daily truck trip rate resulted in fleet percentages for the CalEEMod truck subcategories that were not proportionally adjusted consistent with the percentage of trucks estimated using the ITE 0.64 daily truck trip rate. Specifically, the number of daily trucks using the ITE 0.64 trip rate results in a greater number of daily truck trips: approximately 937 with the ITE 0.64 rate compared with approximately 499 daily trucks using the 0.343 daily truck trip rate based on the trip generation rates used in the Traffic and Circulation Section. Therefore, based on the increase numbers of trucks, the CalEEMod fleet mixture truck subcategories should be proportionally adjusted with the higher numbers of trucks after using the recommended ITE 0.64 daily truck trip rate. In the modeling inputs, however, the individual vehicle category percentages totaled 9.37 percent, which is lower than the percentage of trucks in the Traffic Study. In order to avoid underestimating project operational and related air quality and health effect impacts, the Air Quality Analysis, HRA and FEIR should be revised

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<sup>2</sup> ITE Manual, High Cube Warehouse Distribution Center (ITE Land Use – 152), 0.64 weighted average Truck Trip Generation Rate (trip ends per 1,000 square feet of gross floor area), Page 267.

<sup>3</sup>  $1.337 + 0.343 = 1.68$ .

<sup>4</sup> DEIR, Traffic and Circulation Section, Project Trip Generation, Pages 4.15-6 and 4.15-7.

using the following truck percentages: LHD2 = 0.0645, MHD = 0.0865, HHD = 0.2300.

### **On-Road Truck Trip Length**

3. On page 3.0-7 in the project description, the Lead Agency describes potential truck activities that involve the proposed warehouse trucks. “Goods imported from the Ports of Long Beach and Los Angeles as well as other locations will be delivered via truck to the proposed distribution centers and distributed via truck to both in- and out-of-state locations.” In the CalEEMod output sheets provided in Appendix A of the DEIR appendices, the modeling used a 16.6 mile one-way trip distance was used by trucks employed by perspective tenants and an 8.4 one-way trip distance was used by trucks not employed by perspective tenants was used to estimate operational air quality impacts for trucks moving goods for the proposed facility. Since the port areas are over 70 miles away from the project site and that trucks will be serving other destinations within the basin and out of state, the SCAQMD staff recommends, absent a tenant-specific analysis with trip length information, that all applicable analyses be revised in the FEIR using a one-way trip length that more accurately estimates air quality emission and related impacts based on the anticipated activities and distances described in the DEIR. If the Lead Agency is uncertain of the types of tenants or the trip lengths, the Lead Agency could alternatively limit activities, as a condition of a tenant’s occupancy, to levels described in the analysis. Otherwise, long-term project air quality impacts for operations and other relative analyses will be substantially underestimated.

### **Use of an Un-Refrigerated Warehouse Land Use CalEEMod Model Input**

4. Based on a review of the project’s emissions calculations in Appendix A: Air Quality Analysis<sup>5</sup> (CalEEMod Output Sheets), the Lead Agency determined the proposed Project’s air quality impacts using emission factors for unrefrigerated warehouses/truck activity. However, in mitigation measure MM Air-12 to reduce Operational Emissions starting on Page 4.3-48, the Lead Agency refers to the use of Transportation Refrigeration Units (TRUs) at the project site. The SCAQMD staff therefore recommends that the Lead Agency include a mitigation measure that precludes the use of refrigerated warehousing at the Project site or revise the air quality analysis to account for emissions from refrigerated warehouse uses. Further, if the Lead Agency chooses to include refrigerated warehouses in the air quality analysis then MM Air-12 should be incorporated into the project and remain in the Final EIR.

### **LST and Health Risk Assessment (HRA) Modeling**

5. The Lead Agency used AERMOD (version 12345) to prepare the dispersion modeling for the Localized Significance Thresholds (LST) analysis and AERMOD (Version 13350) for the Health Risk Assessment (HRA). The SCAQMD staff

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<sup>5</sup> Appendix A: CalEEMod Emissions Model Output.

recommends that the Lead Agency use the same version of AERMOD for both the LST and HRA analyses to ensure consistency in the air quality analysis and use the most current version available at the time of performing applicable analyses. Currently, AERMOD (Version 14134) is the most recent available version and should be used to revise the dispersion modeling for this project.

6. The HRA analysis involved the use of separate discrete receptors placed randomly for the sensitive receptors. SCAQMD staff recommends that the Lead Agency revise the HRA using a receptor grid over the existing residences and areas zoned or planned for residential development, in order to ensure that the maximum impacts to a residential receptor are properly analyzed.
7. Based on the site plan in the project description, there are two driveways that access Webster Street where residences are located across from the proposed project site. Traffic exiting the site from Webster Street can then access Ramona Expressway to get on the freeway. Although the project description in the Notice of Availability, the site plan and the computer modeling show truck traffic using only Patterson Avenue north towards Harvey Knox Boulevard to access the 215 Freeway, there is nothing, however, to preclude trucks from using the driveways on Webster Street, passing by existing residences and then accessing Ramona Expressway to get on the freeway. The SCAQMD staff recommends that the FEIR include discussion of how the project will stop trucks from using Webster Avenue or include a restriction that would formally restrict Webster Street to passenger vehicles only. If trucks are not formally restricted, then project impacts from truck movement on Webster Street and beyond (i.e., north on Webster Street, or south to Ramona Expressway to access the 215 Freeway) would have been underestimated in the DEIR. These potential impacts should therefore be analyzed in the HRA and included in the FEIR.

#### **Mitigation Measures for Operational Air Quality Impacts (Mobile Sources)**

8. The California Air Resources Board has classified the particulate portion of diesel exhaust emissions as carcinogenic. During project operations, the Lead Agency has determined that project operation emissions are significant for Volatile Organic Compounds (VOC) and Oxides of Nitrogen (NOx), primarily from truck activity emissions. The SCAQMD staff therefore recommends the following change and additional measures that should be incorporated into the FEIR to reduce exposure to sensitive receptors and reduce project air quality impacts:

Recommended Change:

MM Air-13

- ~~In order to promote alternative fuels, and help support “clean” truck fleets, the developer/successor in interest of each implementing development project shall provide building occupants and businesses with information related to SCAQMD’s Carl Moyer Program, or other State programs that restrict operations~~

to “clean” trucks, such as 2007 or newer model year or 2010 compliant vehicles. Require the use of 2010 compliant diesel trucks, or alternatively fueled, delivery trucks (e.g., food, retail and vendor supply delivery trucks) at commercial/retail sites upon project build-out. If this isn’t feasible, consider other measures such as incentives, phase-in schedules for clean trucks, etc.

Additional Mitigation Measures:

- Provide minimum buffer zone of 300 meters (approximately 1,000 feet) between truck traffic and sensitive receptors based on guidance from the California Air Resource Board (CARB) guidance.<sup>6</sup>
- Limit the daily number of trucks allowed at each facility to levels analyzed in the Final EIR. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the project through CEQA prior to allowing this higher activity level.
- Design the site such that any check-in point for trucks is well inside the facility to ensure that there are no trucks queuing outside of the facility.
- On-site equipment should be alternative fueled.
- Provide food options, fueling, truck repair and or convenience stores on-site to minimize the need for trucks to traverse through residential neighborhoods.
- Improve traffic flow by signal synchronization.
- Have truck routes clearly marked with trailblazer signs, so that trucks will not enter residential areas.
- Because the proposed Project generates significant regional emissions, the Lead Agency should require mitigation that requires accelerated phase-in for non-diesel powered trucks. For example, natural gas trucks, including Class 8 HHD trucks, are commercially available today. Natural gas trucks can provide a substantial reduction in health risks, and may be more financially feasible today due to reduced fuel costs compared to diesel. In the Final CEQA document, the Lead Agency should require a phase-in schedule for these cleaner operating trucks to reduce project impacts. SCAQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency and project applicant.

At a minimum, require upon occupancy that do not already operate 2007 and newer trucks to apply in good faith for funding to replace/retrofit their trucks, such as Carl Moyer, VIP, Prop 1B, or other similar funds. Should funds be awarded, the occupant should also be required to accept and use them.

### **Electric Vehicle (EV) Charging Stations**

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<sup>6</sup> CARB: Air Quality and Land Use Handbook: A Community Health Perspective, April 2005, Page4 for Distribution Centers.

9. Trucks that can operate at least partially on electricity have the ability to substantially reduce the significant NO<sub>x</sub> impacts from this project. Further, trucks that run at least partially on electricity are projected to become available during the life of the project as discussed in the 2012 Regional Transportation Plan. It is important to make this electrical infrastructure available when the project is built so that it is ready when this technology becomes commercially available. The cost of installing electrical charging equipment onsite is significantly cheaper if completed when the project is built compared to retrofitting an existing building. Therefore, the SCAQMD staff recommends the Lead Agency require the proposed facility and other plan areas that allow truck parking to be constructed with the appropriate infrastructure to facilitate sufficient electric charging for trucks to plug-in. Similar to the City of Los Angeles requirements for all new projects, the SCAQMD staff recommends that the Lead Agency require at least 5% of all vehicle parking spaces (including for trucks) include EV charging stations.<sup>7</sup> Further, electrical hookups should be provided at the onsite truck stop for truckers to plug in any onboard auxiliary equipment. At a minimum, electrical panels should appropriately sized to allow for future expanded use.

#### **Mitigation Measures for Operational Air Quality Impacts (Other)**

10. In addition to the mobile source mitigation measures identified above the Lead Agency should incorporate the following on-site area source mitigation measures below to reduce the project's regional air quality impacts from NO<sub>x</sub> emissions during operation. These mitigation measure should be incorporated pursuant to CEQA Guidelines §15126.4, §15369.5.
  - Maximize use of solar energy including solar panels; installing the maximum possible number of solar energy arrays on the building roofs and/or on the Project site to generate solar energy for the facility.
  - Use light colored paving and roofing materials.
  - Utilize only Energy Star heating, cooling, and lighting devices, and appliances.
  - Install light colored "cool" roofs and cool pavements.
  - Limit the use of outdoor lighting to only that needed for safety and security purposes.
  - Require use of electric or alternatively fueled sweepers with HEPA filters.
  - Use of water-based or low VOC cleaning products.

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<sup>7</sup> [http://ladbs.org/LADBSWeb/LADBS\\_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf](http://ladbs.org/LADBSWeb/LADBS_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf)