

September 2, 2021

Chantal Power
Senior Planner
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Dear Chantal Power:

Thank you for providing the California Air Resources Board (CARB) with the opportunity to comment on the Markham Street Truck and Trailer Storage Facility (Project) Mitigated Negative Declaration (MND), State Clearinghouse No. 2021080049. The Project would result in the construction and operation of a truck and trailer storage facility, which would include a 700 square foot guard shack and 247 trailer stalls, and four passenger car parking spaces on a 9.5 acre site. Once in operation, the Project would introduce 464 daily vehicle trips, including 316 daily heavy-duty truck trips, along local roadways. The Project is located within the City of Perris (City), California, which is the lead agency for California Environmental Quality Act (CEQA) purposes.

Industrial development, such as the proposed truck and trailer storage facility, can result in high daily volumes of heavy-duty diesel truck traffic that emit toxic diesel emissions, and contribute to regional air pollution and global climate change.¹ Trucks idling within the Project site and transiting along local roadways will expose nearby communities to elevated levels of air pollution. There is a residence located approximately 280 feet from the Project's northern boundary. Other residential homes are located within one mile of the Project's western, southern and eastern boundary. In addition to residences, the Project site is located within two miles of Rancho Verde High School, Val Verde High School and May Ranch Elementary School. These communities are surrounded by existing toxic diesel particulate matter (diesel PM) emission sources, which include existing industrial sources, the March Air Reserve Base, and vehicular traffic along Interstate 215. Due to the Project's proximity to residences and schools already burdened by multiple sources of air pollution, CARB is concerned with the potential cumulative health impacts associated with the construction and operation of the Project. CARB has reviewed the MND and is concerned about the air pollution and health risk impacts that would result from the proposed Project.

1. With regard to greenhouse gas emissions from this project, CARB has been clear that local governments and project proponents have a responsibility to properly mitigate these impacts. CARB's guidance, set out in detail in the Scoping Plan issued in 2017, makes clear that in CARB's expert view, local mitigation is critical to achieving climate goals and reducing greenhouse gases below levels of significance.

The MND Does Not Evaluate Air Quality and Health Risks Impacts from On-Site Transport Refrigeration Units.

The air quality and cancer risk impacts presented in the MND were evaluated under the assumption that transport refrigeration units (TRU) would not operate within the Project-site. TRUs on trucks and trailers can emit large quantities of diesel exhaust while operating within the Project-site. Residences and other sensitive receptors (e.g., daycare facilities, senior care facilities, and schools) located near where these TRUs could be operating would be exposed to diesel exhaust emissions that could result in significant cancer risk.

The Health Risk Analysis (HRA) prepared for the Project and presented in Appendix H (Health Risk Assessment) of the MND, concluded that residences near the Project site would be exposed to diesel PM emissions that would result in cancer risks of 3.14 chances per million during Project operation. Since the Project's cancer risks were found to be below the South Coast Air Quality Management District's 10 chances per million significance threshold, the MND concluded that the Project would result in a less than significant impact on public health. If the City does not intent for trucks and trailers with TRUs to operate at the Project site, CARB urges the City to include one of the following measures in the Project's final design:

- A Project design measure requiring contractual language in tenant lease agreements that prohibits tenants from operating TRUs within the Project-site; or
- A condition requiring a restrictive covenant over the parcel that prohibits the applicant's use of TRUs on the property unless the applicant seeks and receives an amendment to its conditional use permit allowing such use.

If the City does allow TRUs within the Project site, CARB urges the City to model air pollutant emissions from on-site TRUs, as well as include potential cancer risks from on-site and off-site TRUs in the Project's HRA. The revised HRA should account for all potential health risks from Project-related diesel PM emission sources such as backup generators, TRUs, and heavy-duty truck traffic.

The Final IS/MND Should Include More Mitigation Measures to Further Reduce the Project's Air Pollution Emissions.

The air quality section of the MND concluded that the Project's construction and operational air pollution emissions would result in a less than significant, and no additional mitigation measures were proposed. To further reduce the Project's air pollutant emissions, CARB urges the City and applicant to implement the emissions reduction measures listed below.

- Ensure the cleanest possible construction practices and equipment are used. This includes eliminating the idling of diesel-powered equipment and providing the necessary infrastructure (e.g., electrical hookups) to support zero and near-zero equipment and tools.

- Implement, and plan accordingly for, the necessary infrastructure to support the zero and near-zero emission technology vehicles and equipment that will be operating on site. Necessary infrastructure may include the physical (e.g., needed footprint), energy, and fueling infrastructure for construction equipment, on-site vehicles and equipment, and medium-heavy and heavy-heavy duty trucks.
- In construction contracts, include language that requires all off-road diesel-powered equipment used during construction to be equipped with Tier 4 or cleaner engines, except for specialized construction equipment in which Tier 4 engines are not available. In place of Tier 4 engines, off-road equipment can incorporate retrofits, such that, emission reductions achieved equal to or exceed that of a Tier 4 engine.
- In construction contracts, include language that requires all off-road equipment with a power rating below 19 kilowatts (e.g., plate compactors, pressure washers) used during project construction be battery powered.
- Include contractual language in tenant lease agreements that requires all trailer spaces be equipped with electrical hookups for trucks with TRUs or auxiliary power units. This requirement will substantially decrease the amount of time that a TRU powered by a fossil-fueled internal combustion engine can operate at the Project-site. Use of zero-emission all-electric plug-in TRUs, hydrogen fuel cell transport refrigeration, and cryogenic transport refrigeration are encouraged and can also be included in lease agreements.²
- Include contractual language in tenant lease agreements that requires all TRUs entering the project site be plug-in capable
- In construction contracts, include language that requires all heavy-duty trucks entering the construction site, during the grading and building construction phases be model year 2014 or later. All heavy-duty haul trucks should also meet CARB's lowest optional low-oxides of nitrogen (NO_x) standard starting in the year 2022.³
- Including language in tenant lease agreements, requiring the installing of vegetative walls⁴ or other effective barriers that separate loading docks and people living or working nearby.

2 CARB's Technology Assessment for Transport Refrigerators provides information on the current and projected development of TRUs, including current and anticipated costs. The assessment is available at:

https://www.arb.ca.gov/msprog/tech/techreport/tru_07292015.pdf

3. In 2013, CARB adopted optional low-NO_x emission standards for on-road heavy-duty engines. CARB encourages engine manufacturers to introduce new technologies to reduce NO_x emissions below the current mandatory on-road heavy-duty diesel engine emission standards for model-year 2010 and later. CARB's optional low-NO_x emission standard is available at: <https://ww2.arb.ca.gov/our-work/programs/optional-reduced-nox-standards>

4. Effectiveness of Sound Wall-Vegetation Combination Barriers as Near-Roadway Pollutant Mitigation Strategies (2017) is available at: <https://ww2.arb.ca.gov/sites/default/files/classic/research/apr/past/13-306.pdf>

Conclusion

To reduce the exposure of toxic diesel PM emissions in nearby communities already impacted by air pollution, the final design of the Project should include all existing and emerging zero-emission technologies to minimize diesel PM and NOx emissions, as well as the greenhouse gases that contribute to climate change. CARB encourages the City and applicant to implement the measures listed in this letter.

Given the breadth and scope of projects subject to CEQA review throughout California that have air quality and greenhouse gas impacts, coupled with CARB's limited staff resources to substantively respond to all issues associated with a project, CARB must prioritize its substantive comments here based on staff time, resources, and its assessment of impacts. CARB's deliberate decision to substantively comment on some issues does not constitute an admission or concession that it substantively agrees with the lead agency's findings and conclusions on any issues on which CARB does not substantively submit comments.

CARB appreciates the opportunity to comment on the MND for the Project and can provide assistance on zero-emission technologies and emission reduction strategies, as needed. Please include CARB on your State Clearinghouse list of selected State agencies that will receive the Final MND as part of the comment period. If you have questions, please contact Stanley Armstrong, Air Pollution Specialist via email at stanley.armstrong@arb.ca.gov.

Sincerely,



Robert Krieger, Branch Chief, Risk Reduction Branch

cc: see next page.

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