

3 Comments and Responses

The City of Perris has received two responses to the Initial Study/MND. The commenters and the date which each commenter’s letter was received are listed in Table 1.

Table 1

| Letter or Public Comment No. and Commenter | Date Received |
|--|-------------------|
| Public Comment Letters | |
| Mauricio Alvarez, Riverside Transit Agency | January 20, 2025 |
| Sahar Ghadimi, South Coast Air Quality Management District | February 6, 2025 |
| 1. Sam Wang, South Coast Air Quality Management District | February 13, 2025 |
| 2. Perris Neighbors in Action Team | February 19, 2025 |

The RTA had no comment and Shara Ghadimi from SCAQMD requested additional information. Both correspondences did not raise additional environmental concerns that have already been addressed in the IS/MND.

The additional public comment letters and responses follow. The comment letters have been numbered sequentially, and each separate issue raised by the commenter has been assigned a number.



SENT VIA E-MAIL:

nperez@cityofperris.org

February 13, 2025

Nathan Perez, Senior Planner
City of Perris
Development Service Department
Planning Division
135 N. "D" Street
Perris, CA 92570

**Notice of Intent to Adopt a Mitigated Negative Declaration (MND No. 2395)
for the Perris Hydrogen and CNG Fueling Station Improvements Project -
Specific Plan Amendment 24-0586 and Major Modification 23-05073
(SCH No. 2025011019)
(Proposed Project)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciate 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 have provided a brief summary of the project information and prepared the following comments which are organized by topic of concern.

Summary of Proposed Project Information in the Draft Initial Study (IS)/ Mitigated Negative Declaration (MND)

Based on the MND, the Propose Project consists of expanding the existing Chevron vehicle fuel station 1) Specific Plan Amendment to change the land use designation of .94 acres from Residential to Commercial and to apply a Residential Overlay; and 2) Major Modification for the construction of (3) islands to accommodate six (6) CNG and Diesel Fuel dispensers under a proposed 1,536 square foot canopy, two(2) islands to accommodate four (4) Hydrogen fuel dispensers under a proposed 1,496 square foot canopy; and two (2) walled enclosures for CNG Hydrogen and Electrical equipment.¹ Based on a review of aerial photographs, South Coast AQMD staff found that the nearest sensitive receptor (e.g., single-family residential) is located approximately 28 feet north of the project site.² Construction activities would be completed in approximately five to six months. The Proposed Project is located at 4063 North Webster Avenue, north of Chevron Fueling Station, located at 796 Ramona Expressway.³

South Coast AQMD Comments

Ensuring Accurate Emission Reporting: Inclusion of Maximum Daily Emissions in IS/MND

¹ IS/MND. Page 29.

² *Ibid.* Page 135.

³ *Ibid.* Page 29.

- 1.1 According to *Appendix A – Air Quality Impact Analysis* in the draft IS/MND, the Lead Agency utilizes the California Emissions Estimator Model (CalEEMod) version 2022.1.0 to analyze the Proposed Project's regional and localized construction and operational emissions for both winter and summer scenarios. However, the draft IS/MND document only reports the daily average emissions for both construction and operational phases,⁴ which could lead to an underestimation of the project's worst-case air quality impacts. To ensure a comprehensive and accurate disclosure of potential air quality impacts, the draft IS/MND should report the *maximum* daily emissions rather than (or in addition to) the daily averages and evaluate them against South Coast AQMD's CEQA air quality daily significance thresholds. It is recommended that the Lead Agency update the draft IS/MND document accordingly.

South Coast AQMD Air Permits and Role as a Responsible Agency

- 1.2 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. The final CEQA document, whether a MND or EIR, should include a discussion about the potentially applicable rules that the Proposed Project needs to comply with. Those rules may include, for example, Rule 201 – Permit to Construct,⁵ Rule 203 – Permit to Operate,⁶ Rule 401 – Visible Emissions,⁷ Rule 402 – Nuisance,⁸ Rule 403 – Fugitive Dust,⁹ Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,¹⁰ Rule 1113 – Architectural Coating,¹¹ Rule 1166 – Volatile Organic Compound Emissions From Decontamination of Soil,¹² Rule 1179 – Publicly Owned Treatment Works Operation,¹³ Regulation XIII – New Source Review,¹⁴ Rule 1401 – New Source Review of Toxic Air Contaminants,¹⁵ Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants,¹⁶ Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion

⁴ *Ibid.* Page 156.

⁵ South Coast AQMD. Rule 201 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>

⁶ South Coast AQMD. Rule 203 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>

⁷ South Coast AQMD. Rule 401 available at <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf>

⁸ South Coast AQMD. Rule 402 available at <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>

⁹ South Coast AQMD. Rule 403 available at <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403>

¹⁰ South Coast AQMD. Rule 1110.2 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf

¹¹ South Coast AQMD. Rule 1113 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf>

¹² South Coast AQMD. Rule 1166 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>

¹³ South Coast AQMD. Rule 1179 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1179.pdf>

¹⁴ South Coast AQMD. Regulation XIII available at <https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii>

¹⁵ South Coast AQMD. Rule 1401 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf>

¹⁶ South Coast AQMD. Rule 1466 available <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf>

and Other Compression Ignition Engines,¹⁷ etc. It is important to note that when air permits from South Coast AQMD are required, the role of South Coast AQMD changes 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 Sections 15086, the Lead Agency is required to consult with South Coast AQMD.

1.3

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 the process for conducting a review of the Proposed Project and issuing discretionary approvals. Moreover, it is important to note that if a Responsible Agency determines that a CEQA document is not adequate to rely upon for its discretionary approvals, the Responsible Agency must take further actions listed in CEQA Guideline Section 15096(e), which could have the effect of delaying the implementation of the Proposed Project. In its role as CEQA Responsible Agency, the South Coast AQMD is obligated to ensure that the CEQA document prepared for this Proposed Project contains a sufficient project description and analysis to be relied upon in order to issue any discretionary approvals that may be needed for air permits. South Coast AQMD is concerned that the project description and analysis in its current form in the MND is inadequate to be relied upon for this purpose. Moreover, based on the Appendix (A-1) Health Risk Assessment document, the gas station Health Risk Assessment (HRA) was performed using the SCAQMD RiskTool (V1.105). However, there is an updated HRA Tool and AERMOD-Ready Meteorological Data Files,¹⁸ can be used to evaluate the Maximum Incremental Cancer Risk (MICR). The lead agency is advised to rerun the modeling files for the individual gas station using the latest version of South Coast AQMD RiskTool.

The final CEQA document should be revised to include a discussion about any and all new stationary and portable equipment requiring South Coast AQMD air permits, provide the evaluation of their air quality and greenhouse gas impacts, and identify South Coast AQMD as a Responsible Agency for the Proposed Project as this information will 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 <https://www.aqmd.gov/home/permits>.

Conclusion

The Lead Agency is recommended to revise the CEQA analysis to address the aforementioned comments and provide the necessary evidence to sufficiently support the conclusions reached. If the requested information and analysis are not included in the final CEQA document, either the Final MND or other type of CEQA document, the Lead Agency should provide reasons for not doing so. Pursuant to California Public Resources Code Section 21092.5(b) and CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process and notify each public agency when any public hearings are scheduled. Please provide

¹⁷ South Coast AQMD. Rule 1470 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf>

¹⁸ [Health Risk Assessment Tool and AERMOD-Ready Meteorological Data Files](#)

South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, detailed reasons supported by substantial evidence in the record explaining why specific comments and suggestions are not accepted must be provided. In addition, if the Lead Agency decides to adopt the Final MND, please provide South Coast AQMD with a notice of any scheduled public hearing(s).

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 comment letter. Please contact Sahar Ghadimi, Air Quality Specialist, at sghadimi@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

Sam Wang

Program Supervisor, CEQA IGR

Planning, Rule Development & Implementation

SW:SG

RVC250122-05

Control Number

Letter 1

Commenter: Sam Wang, South Coast Air Quality Management District

Date: February 13, 2025

Response 1.1

As shown in Appendix A of the draft IS/MND, the maximum daily emissions during Project construction and operation would not exceed SCAQMD thresholds. During construction, the maximum daily emissions of ROG are 2.72 lbs/day, NOx are 15.2 lbs/day, CO are 13.5 lbs/day, SO₂ are 0.04 lbs/day, PM₁₀ are 3.11 lbs/day, and PM_{2.5} are 1.68 lbs/day. The SCAQMD project level construction thresholds are 75 lbs/day for ROG, 100 lbs/day for NOx, 550 lbs/day for CO, 150 lbs/day for SOx, 150 lbs/day for PM₁₀, and 55 lbs/day for PM_{2.5}. Therefore, Project maximum daily construction emissions do not exceed construction thresholds. During operation, the maximum daily emissions of ROG are 12.0 lbs/day, NOx are 15.6 lbs/day, CO are 111 lbs/day, SO₂ are 0.27 lbs/day, PM₁₀ are 22.7 lbs/day, and PM_{2.5} are 5.97 lbs/day. The SCAQMD project level operational thresholds are 55 lbs/day for ROG, 55 lbs/day for NOx, 550 lbs/day for CO, 150 lbs/day for SOx, 150 lbs/day for PM₁₀, and 55 lbs/day for PM_{2.5}. Therefore, max daily operational emissions do not exceed SCAQMD thresholds.

Response 1.2

The CalEEMod modeling accounts for the use of CNG compressors, CNG dryers, CNG electrical equipment, and electric panels during Project operation. However, the equipment proposed falls below 50 horsepower and would be permit exempt per SCAQMD Rule 219. In the event other stationary or portable equipment is required in the Project future then the Applicant would comply with all SCAQMD rules and permitting requirements.

Response 1.3

Appendix B provides a standalone health risk assessment (HRA) that evaluates the potential risks posed to nearby receptors during Project construction and operation of the new land uses on the Project site. The HRA did not utilize SCAQMD screening tools, instead it used USEPA's AERMOD and CARB's HARP2 with OEHA guidance. The meteorological data was for the Perris Met Station from 2010 to 2016. This was the meteorological data available during the preparation of the health risk modeling. The impacts were found to fall to less than significant levels with the implementation of mitigation. Review of the 2016 to 2024 Perris Met Station Wind Rose (a wind pattern graph at a SCAQMD meteorological site) demonstrates that the strongest and most frequent wind generates from the north-northwest and blows south-southeast, see: https://www.aqmd.gov/assets/aermet/AERMET_files_And_HRA_Tool.html. The nearest sensitive receptors lie north of the Project site, therefore the wind patterns indicate that under the updated meteorological data the emissions would generally blow away from the receptors and therefore, would continue to result in a less than significant impact. In terms of new stationary and portable equipment, the CalEEMod modeling accounts for the use of CNG compressors, CNG dryers, CNG electrical equipment, and electric panels during Project operation. However, the equipment proposed falls below 50 horsepower and would be permit exempt per SCAQMD Rule 219. In the event other stationary or portable equipment is required in the Project future then the Applicant would comply with all SCAQMD rules and permitting requirements.

From: Jairo Carbajal <perrisneighborsinaction@gmail.com>

Sent: Wednesday, February 19, 2025 4:10 PM

To: Nathan Perez <NPerez@cityofperris.org>; Alfredo Garcia <algarcia@cityofperris.org>; Patricia Brenes <pbrenes@CityofPerris.org>

Subject: Public Comment on Record for Item 6A,6C,6D Planning Commission Meeting 2/19/25

Dear Mr. Perez and Mr. Garcia,

We are writing in opposition to Items 6A,6C,6D which will be seen at tonight's planning commission meeting.

Our concerns with Item 6A include,

Area being chosen to be rezoned to Residential is not a suitable site to replace the lost housing.

The truck station proximity is extremely close to the homes of residents.

The project needs much more environmental review to know about how this will affect the residents next door.

Concerns with Item 6c -

Multiple agencies have sent letters of concern of this project and we wish for the city to take those concerns seriously and address them. Perris cannot afford to lose more commercial space than we already have. We do not need more warehouse disguised as business parks.

Concerns with 6d -

The site North east is described as business park but its zoned for commercial, this is a mistake and it undermines the developer's claim that the site will be entirely surrounded and not-visible to nearby traffic. The development needs to have legitimate environmental review done as well. We do not need more warehouses in Perris, please do not approve this rezone.

Thank you,

Perris Neighbors in Action Team

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Letter 2

Commenter: Perris Neighbors in Action Team

Date: February 19, 2025

Response 2.1

Section 15088 of the CEQA Guidelines only requires detailed responses when a comment raises significant environmental issues. The concern has been reviewed against current CEQA guidelines, with City Staff and City Attorney and no further need for review or any additional mitigation is required. Thus, no changes to the document are necessary. The comment will, however, become part of the administrative record and will be considered by the decision makers. Thank you for participating in the CEQA process.