



11/20/2023

VIA EMAIL ONLY

Nathan Perez, Senior Planner
City of Perris Planning Division
135 North "D" Street
Perris, CA 92570
Email: nperez@cityofperris.org

RE: NOP Comments for Perris Airport Logistics Center Project

Dear Mr. Perez,

On behalf of Californians Allied for a Responsible Economy ("CARE CA") thank you for the opportunity to provide comments on the Notice of Preparation ("NOP") for environmental review of the Perris Airport Logistics Center Project (the "Project"). The proposed Project will be the construction of two industrial warehouse/distribution buildings totaling 867,070 square feet on one site and a trailer storage lot with a 100-square-foot guard shack on another site.

The Initial Study ("IS") identifies the Project's potentially significant impacts under CEQA to include Aesthetics, Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Noise, Transportation, Tribal Cultural Resources, and Utilities and Service Systems. CARE CA respectfully requests, under CEQA complete analysis of these impacts, imposition of all feasible mitigation and study of a reasonable range of alternatives, including at least two environmentally superior alternatives to the Project.

The City should also consider the following comments:

i) Project Description: The Project description contains a statement of the project objectives that the lead agency uses to determine a reasonable range of alternatives. The City should avoid developing objectives that are so narrow as to exclude any meaningful alternative other than the Project. Such a narrow approach for describing project objectives ensures that the alternatives analysis is essentially useless and foregone conclusion. In *We Advocate Through*

Envtl. Review v. City of Mount Shasta, the court found that the project objectives were unreasonably narrow and impacted analysis of the no-project alternative.

ii) Unspecified Industrial Uses: The DEIR should clearly articulate assumptions regarding the type and mix of warehouse uses¹ that would likely occupy the massive warehouse space to ensure that the unique impacts of each use (i.e., both truck and vehicular trips, air quality, GHG emissions, public health risk and other environmental effects) are comprehensively evaluated and disclosed to the public and City decision makers throughout the CEQA process.

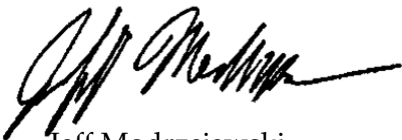
If the Project will not include cold storage, then the City must include California Air Resources Board (CARB) recommended design measures in the DEIR. CARB recommends requiring contractual language in tenant lease agreements or restrictive covenant over parcels to prohibit use of transport refrigeration units (TRU).

iii) Public Health: The project sites are close to residences. We all know that the proposed uses will bring in hundreds and hundreds of diesel emitting trucks and cargo handling equipment into the neighborhood. No doubt, this will affect the public's health and we must not ignore the unjust consequences of toxic pollution on surrounding communities and workers.

The City must ensure that the DEIR is not deficient in its informational discussion of air quality impacts as they connect to adverse human health effects. Therefore, estimates of the significance of air quality impacts must be consistent with current epidemiological studies regarding the effects of pollution and various kinds of environmental stress on public health. In addition, the DEIR must include a mobile source Health Risk Assessment that includes both construction and operational diesel PM emissions and cancer risk assessment.

Thank you for the opportunity to submit NOP comments. CARE CA respectfully urges the City to take this opportunity to protect the environment and the community to the maximum extent feasible. We look forward to reviewing and commenting on subsequent environmental review documents when these documents are released for public review.

Sincerely,



Jeff Modrzejewski
Executive Director

¹ <http://newpromisefarms.com/files/2018/07/HighCube-Warehouse-Oct-2016-Study-ITE.pdf>