

# Letter 1

## Lilburn Accounting

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**From:** Chantal Power <cpower@interwestgrp.com>  
**Sent:** Monday, August 16, 2021 8:13 AM  
**To:** Cheryl Tubbs; Bobby Nassir; Grace Williams  
**Subject:** FW: Markham Street Truck & Trailer Storage

We received comments from the neighboring resident to the north of the property. Please include this in the response to comments.



**INTERWEST**  
CHANTAL POWER, AICP  
**SENIOR PLANNER**

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909.754.1653  
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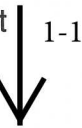
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**From:** Adriana Mitchell <luckyshoes2007@yahoo.com>  
**Sent:** Sunday, August 15, 2021 6:55 AM  
**To:** Chantal Power <cpower@interwestgrp.com>  
**Subject:** Markham Street Truck & Trailer Storage

Chantal Power  
City of Perris Planning Division  
135 N. "D" Street  
Perris, Calif. 92570-2200

Dear Sir/Madam:

I am writing to you today on behalf of my mother, Ines Siedloczek, who is 92 years old and resides at 115 E. Nance Street, Perris, Ca. 92572.



I have received and reviewed your Notice of Intent to Adopt Mitigated Negative Declaration No. 2361 for Markham Street Truck and Trailer Storage Facility Located on the North Side of Markham St. Between Perris Blvd and Redlands Ave., dated July 28, 2021.

1-1  
cont

Due to the proposed truck terminal is to be built adjacent to my mother's property. there are a few concerns that my mom and her family would like to address:

1-2

- Due to the noise (air brakes), will there be a LARGE BLOCK WALL and LANDSCAPE between my mother's property and the terminal to buffer the noise?

- How are you addressing the air pollutants created by the number of diesel trucks (247 stalls), going in and out of this truck terminal and parking lot which could cause health issues to my mother, caregivers and family? How are they protected from this?

1-3

- Declaration No. 2361 states that security guards WILL NOT be present 24 hours. What security measures are you providing my mother and her property from people scanning her wall?

1-4

I am my mother's POA and Trustee and would appreciate if you would direct answers and all correspondence, notices and concerns to my attention:

1-5

Adriana Mitchell

10 Indianola Circle

The Colony, TX 75056

email: [Luckyshoes2007@yahoo.com](mailto:Luckyshoes2007@yahoo.com)

Sincerely,

Adriana Mitchell

Total Control Panel

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September 14, 2021

Chantal Power, AICP  
City of Perris  
Development Services Department: Planning Division  
101 North D Street  
Perris, CA 92570-2200

**Subject: Response to Letter No. 1 Initial Study/Mitigated Negative Declaration, City of Perris; Markham Street Truck and Trailer Storage Facility; State Clearinghouse (SCH) No. 2021080049**

This comment letter is an email submitted by Ms. Adriana Mitchell (10 Indianola Circle, The Colony, TX 75056) on behalf of Ines Siedloczek who resides at 115 East Nance Street, Perris, CA 92572.

**Response to Comment 1-2:**

As noted in the Initial Study (page 56), a Noise Impact Analysis dated September 16, 2020, as well as a revised memorandum dated March 19, 2021 were prepared by Urban Crossroads and included as Appendix E to the Initial Study. This study was primarily completed to evaluate noise from truck using the Project Site, not travelling to/from the Site. Using reference operational noise level measurements outlined in the Noise Analysis, the exterior operational noise levels from the Project at the nearest residential structure located at 75 East Nance Street and near the property line were estimated. This property is adjacent to the west of your property of concern. The Project modeled operational noise levels from the Project satisfy the City of Perris daytime noise standards at 75 Nance Street without or with the potential 10-foot-high wall. The operational noise levels satisfy the nighttime noise standards both at the residential structure and at the property line which is nearest the Project Site. The operational noise analysis shows that the Project-related noise levels will satisfy the City of Perris daytime and nighttime noise standards at the property line with a 10-foot-high wall which will be constructed as part of the Project.

The City of Perris has adopted a designated truck route map and Perris Boulevard is identified as a designated truck route. This is why the Noise Analysis did not evaluate truck noise along Perris Boulevard. Designated truck route maps from the General Plan and the Perris Valley Commerce Center Specific Plan were utilized to route the Project's truck traffic from the Project and future cumulative development projects throughout the study area. All trailer truck access from Project Site will be directed from Perris Boulevard to Harley Knox Boulevard then to the 215-Interstate Freeway. Trucks will travel along Perris Boulevard, a designated truck route, approximately 335 feet west of your property in question.

**Response to Comment 1-3:**

A Mobile Source Health Risk Assessment (HRA) dated April 28, 2021 was prepared for the Proposed Project in accordance with PVCCSP EIR and was summarized in the Initial Study. The HRA evaluated the potential health risk impacts to sensitive receptors (which are residents) and adjacent workers associated with the development of the proposed Project, more specifically,

health risk impacts as a result of exposure to Toxic Air Contaminants (TACs) including diesel particulate matter (DPM) as a result of heavy-duty diesel trucks accessing the site.

The residential land use with the greatest potential exposure to Project TAC source emissions is the existing residence, approximately 376 feet north of the Project site (75 Nance Street). The receptor for modeling purposes was placed at the private outdoor living areas (backyards) facing the Project site. At the maximally exposed individual receptor (MEIR), the maximum incremental cancer risk attributable to Project TAC source emissions is estimated at 3.14 in one million, which is less than South Coast Air Quality Management District's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Because all other modeled residential receptors would be exposed to lesser concentrations and are located at a greater distance from the Project site and primary truck route than the MEIR analyzed herein, and TACs generally dissipate with distance from the source, all other residential receptors in the vicinity of the Project site would be exposed to less emissions and, therefore, less risk than the MEIR identified herein. As such, the Project will not cause a significant human health or cancer risk to nearby residences.

**Response to Comment 1-4:**

An actual tenant has not yet been finalized for the Project and therefore specific security demands are not certain. However, based on similar operations it is estimated that security will be provided a minimum 10 – 14 hours/day. Additionally, the northerly block wall, at ten feet high, is intended to act as both a noise barrier and a deterrent to trespassing.

## Letter 2



Gavin Newsom, Governor  
Jared Blumenfeld, CalEPA Secretary  
Liane M. Randolph, Chair

September 2, 2021

Chantal Power  
Senior Planner  
City of Perris Planning Division  
135 North "D" Street  
Perris, California 92570-2200  
[cpower@interwestgrp.com](mailto:cpower@interwestgrp.com)

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.<sup>1</sup> 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.

2-1

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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 Heath 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.

2-2

2-3

- 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.<sup>2</sup>
- 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<sub>x</sub>) standard starting in the year 2022.<sup>3</sup>
- Including language in tenant lease agreements, requiring the installing of vegetative walls<sup>4</sup> or other effective barriers that separate loading docks and people living or working nearby.

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

3. In 2013, CARB adopted optional low-NO<sub>x</sub> emission standards for on-road heavy-duty engines. CARB encourages engine manufacturers to introduce new technologies to reduce NO<sub>x</sub> emissions below the current mandatory on-road heavy-duty diesel engine emission standards for model-year 2010 and later. CARB's optional low-NO<sub>x</sub> 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.

2-4

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](mailto:stanley.armstrong@arb.ca.gov).

Sincerely,



Robert Krieger, Branch Chief, Risk Reduction Branch

cc: see next page.

cc: State Clearinghouse  
[state.clearinghouse@opr.ca.gov](mailto:state.clearinghouse@opr.ca.gov)

Carlo De La Cruz, Senior Campaign Representative, Sierra Club  
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Alan De Salvio, Deputy Director of Mojave Desert Operations, Mojave Desert Air  
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Morgan Capilla, NEPA Reviewer, U.S. Environmental Protection Agency, Air Division,  
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Stanley Armstrong, Air Pollution Specialist, Risk Reduction Branch

September 14, 2021

Chantal Power, AICP  
City of Perris  
Development Services Department: Planning Division  
101 North D Street  
Perris, CA 92570-2200

**Subject: Response to Letter No. 2 Initial Study/Mitigated Negative Declaration, City of Perris; Markham Street Truck and Trailer Storage Facility; State Clearinghouse (SCH) No. 2021080049**

This letter is in response to the comment letter received from the California Air Resources Board dated September 2<sup>nd</sup>, 2021, concerning the Initial Study/Mitigated Negative Declaration for the Markham Street Truck and Trailer Facility, which was submitted on August 4<sup>th</sup>, 2021 to the City of Perris.

**Response to Comment 2-1:**

A Mobile Source Health Risk Assessment (HRA) dated April 28, 2021, by Urban Crossroads was completed for the Proposed Project (Appendix A-1 of the Initial Study) in accordance with Perris Valley Commerce Center Specific Plan (PVCCSP) EIR mitigation measure MM Air 15. The HRA evaluates the potential health risk impacts to sensitive receptors (which are residents) and adjacent workers associated with the development of the proposed Project, more specifically, health risk impacts as a result of exposure to Toxic Air Contaminants (TACs) including diesel particulate matter (DPM) as a result of heavy-duty diesel trucks accessing the site. The findings of the HRA as follows:

*Individual Exposure Scenario:*

The residential land use with the greatest potential exposure to Project TAC source emissions is referred to in the HRA as Location R4, which represents the existing residence, approximately 376 feet northwest of the Project site. Receptor R4 is placed at the private outdoor living areas (backyards) facing the Project site. At the maximally exposed individual receptor (MEIR), the maximum incremental cancer risk attributable to Project TAC source emissions is estimated at 3.14 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Because all other modeled residential receptors would be exposed to lesser concentrations and are located at a greater distance from the Project site and primary truck route than the MEIR analyzed herein, and TACs generally dissipate with distance from the source, all other residential receptors in the vicinity of the Project site would be exposed to less emissions and, therefore, less risk than the MEIR identified herein. As such, the Project will not cause a significant human health or cancer risk to nearby residences.

*Worker Exposure Scenario:*

The worker receptor land use with the greatest potential exposure to Project TAC source emissions is Location R2, which represents the Penske Logistics Building, approximately 70 feet east of the Project site. Receptor R2 is placed at the building façade where a worker could remain

for a typical workday. At the maximally exposed individual worker (MEIW), the maximum incremental cancer risk is 0.84 in one million which is less than the SCAQMD's threshold of 10 in one million. Maximum non-cancer risks at this same location were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Because all other modeled worker receptors are located at a greater distance than the MEIW analyzed in the HRA, and DPM dissipates with distance from the source, all other worker receptors in the vicinity of the Project site would be exposed to less emissions and therefore less risk than the MEIW identified herein. As such, the Project will not cause a significant human health or cancer risk to adjacent workers.

Therefore, potential health risk impacts on the development of the 9.5-acre site have been addressed.

**Response to Comment 2-2:**

This comment states that the Draft IS/MND should model TRUs. At the time of this writing, it has not been determined if the ultimate tenant would operate TRUs. However, the project was modeled without cold storage as a use and would be approved as such by the City. Therefore, in the event such use is proposed in the future, the City would analyze such use for compliance with CEQA and would require additional environmental analysis, if applicable.

**Response to Comment 2-3:**

Comment noted. As the project does not exceed thresholds, the Planning Department may consider adding additional measures.

**Response to Comment 2-4:**

Comment noted. As the project does not exceed thresholds the Planning Department may consider adding additional measures.

## Letter 3

JASON E. UHLEY  
General Manager-Chief Engineer



1995 MARKET STREET  
RIVERSIDE, CA 92501  
951.955.1200  
951.788.9965 FAX  
www.rcflood.org

### RIVERSIDE COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT

239991

September 2, 2021

City of Perris  
Planning Department  
135 North D Street  
Perris, CA 92570

Attention: Chantal Power

Re: CUP 20-05100, SPA 20-05180 and  
PM 20-051279, APNs 302-110-031 and  
302-110-032

The Riverside County Flood Control and Water Conservation District (District) does not normally recommend conditions for land divisions or other land use cases in incorporated cities. The District also does not plan check City land use cases or provide State Division of Real Estate letters or other flood hazard reports for such cases. District comments/recommendations for such cases are normally limited to items of specific interest to the District including District Master Drainage Plan facilities, other regional flood control and drainage facilities which could be considered a logical component or extension of a master plan system, and District Area Drainage Plan fees (development mitigation fees). In addition, information of a general nature is provided.

The District's review is based on the above-referenced project transmittal, received August 3, 2021. The District **has not** reviewed the proposed project in detail, and the following comments do not in any way constitute or imply District approval or endorsement of the proposed project with respect to flood hazard, public health and safety, or any other such issue:

- This project would not be impacted by District Master Drainage Plan facilities, nor are other facilities of regional interest proposed.
- This project involves District proposed Master Drainage Plan facilities, namely, Perris Valley MDP Line D and Lateral D-2. The District will accept ownership of such facilities on written request of the City. Facilities must be constructed to District standards, and District plan check and inspection will be required for District acceptance. Plan check, inspection, and administrative fees will be required.
- This project proposes channels, storm drains 36 inches or larger in diameter, or other facilities that could be considered regional in nature and/or a logical extension of the adopted Perris Valley Master Drainage Plan. The District would consider accepting ownership of such facilities on written request of the City. Facilities must be constructed to District standards, and District plan check and inspection will be required for District acceptance. Plan check, inspection, and administrative fees will be required.

- This project is located within the limits of the District's Perris Valley San Jacinto River Homeland/Romoland Line A Homeland/Romoland Line B Area Drainage Plan for which drainage fees have been adopted. If the project is proposing to create additional impervious surface area, applicable fees should be paid only by cashier's check, wire transfer, phone or online payment to the Flood Control District or City prior to issuance of grading or building permits. Fees to be paid should be at the rate in effect at the time of issuance of the actual permit.
- An encroachment permit shall be obtained for any construction related activities occurring within District right of way or facilities, namely, Perris Valley MDP Line D. For further information, contact the District's Encroachment Permit Section at 951.955.1266.
- The District's previous comments are still valid.

**GENERAL INFORMATION**

This project may require a National Pollutant Discharge Elimination System (NPDES) permit from the State Water Resources Control Board. Clearance for grading, recordation, or other final approval should not be given until the City has determined that the project has been granted a permit or is shown to be exempt.

If this project involves a Federal Emergency Management Agency (FEMA) mapped floodplain, then the City should require the applicant to provide all studies, calculations, plans, and other information required to meet FEMA requirements, and should further require the applicant obtain a Conditional Letter of Map Revision (CLOMR) prior to grading, recordation, or other final approval of the project and a Letter of Map Revision (LOMR) prior to occupancy.

If a natural watercourse or mapped floodplain is impacted by this project, the City should require the applicant to obtain a Section 1602 Agreement from the California Department of Fish and Wildlife and a Clean Water Act Section 404 Permit from the U.S. Army Corps of Engineers, or written correspondence from these agencies indicating the project is exempt from these requirements. A Clean Water Act Section 401 Water Quality Certification may be required from the local California Regional Water Quality Control Board prior to issuance of the Corps 404 permit.

Very truly yours,



DEBORAH DE CHAMBEAU  
Engineering Project Manager

ec: Riverside County Planning Department  
Attn: Phayvanh Nanthavongdouangsy  
SLJ:ju

September 14, 2021

Chantal Power, AICP  
City of Perris  
Development Services Department: Planning Division  
101 North D Street  
Perris, CA 92570-2200

**Subject: Response to Letter No. 3, Riverside County Flood Control and Water Conservation District, September 2, 2021**

This letter addresses the District's Master Drainage Plan Facilities, of which MDP Line D and Lateral D-2 are planned to cross through the Project Site. The Applicant is currently working with the District to reach agreement regarding the construction and ownership of drainage facilities.

These comments are not related to CEQA and therefore no further response is required.