



# South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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## **Mitigated Negative Declaration (MND) for the Proposed Cottonwood Commons**

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

### Project Description

The Lead Agency proposes to develop a total of 45,375 square feet of retail uses including a gasoline station with 16 fueling pumps on an approximately 6.24-acre vacant site (Proposed Project). Based on a review of aerial photographs, SCAQMD staff found that an elementary school is located approximately 1,400 feet west of the Proposed Project. Construction is expected to take approximately 10 months<sup>1</sup>.

### Air Quality Analysis – Localized Air Quality Impact Analysis during Construction

Sensitive receptors are people that have an increased sensitivity to air pollution or environmental contaminants. They include schools, parks and playgrounds, daycare centers, nursing homes, elderly care facilities, hospitals, and residential dwelling units. Based a review of aerial photographs, SCAQMD staff found that an elementary school is located approximately 1,400 feet (or 430 meters) west of the Proposed Project. However, the Lead Agency did not quantify the Proposed Project's localized construction emissions in the MND. Therefore, SCAQMD staff recommends that the Lead Agency quantify the Proposed Project's localized construction emissions and disclose the localized air quality impacts in the Final MND to ensure that any nearby students and teachers at the elementary school are not adversely affected by the Proposed Project's construction activities. SCAQMD guidance for performing a localized air quality analysis is available on SCAQMD website<sup>2</sup>. The Lead Agency should use CalEEMod to calculate NOx, CO, PM10, and PM2.5 emissions and compare them to the SCAQMD localized air quality significance thresholds in the SCAQMD's Mass Rate Look-up Tables for the Source Area Receptor No. 28 (Hemet/San Jacinto Valley). The Lead Agency should also specify the maximum daily disturbance of the site and apply the appropriate receptor distance based on the nearest sensitive receptors in the analysis.

### Air Quality Analysis – Operational Impact Analysis

In the Air Quality analysis, the Lead Agency found that the Proposed Project's regional construction and operational air quality impacts would be less than significant. However, it does not appear that the Air Quality analysis include operational ROG emissions generated from storage tanks or from the fueling process. This may have likely led to an under-estimation of the Proposed Project's operational air quality impacts. It is important to note that while CalEEMod<sup>3</sup> quantifies mobile source emissions (e.g., trip visits by patrons) associated with operating a gasoline service station, CalEEMod does not quantify the operational stationary source emissions from the storage tanks and fueling equipment. Therefore, it is

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<sup>1</sup> MND, Page 34.

<sup>2</sup> South Coast Air Quality Management District. *Localized Significance Thresholds*. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

<sup>3</sup> CalEEMod incorporates up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and is available free of charge at: [www.caleemod.com](http://www.caleemod.com).

recommended that the Lead Agency use its best efforts to quantify and disclose operational emissions from the fueling process in the Final MND.

#### Health Risk Assessment

As stated above, the Proposed Project would be located near an elementary school. Benzene, which is a toxic air contaminant, may be emitted from the Proposed Project's gasoline refueling operations. To ensure that children and teachers at the elementary school are not going to be adversely affected by the exposure to benzene, it is recommended that the Lead Agency evaluate, quantify, and perform a health risk assessment for the Proposed Project and disclose the health impacts in the Final MND. Guidance for performing a gasoline dispensing station health risk assessment can be found in the SCAQMD's *Emission Inventory and Risk Assessment Guidelines for Gasoline Dispensing Stations*<sup>4</sup>.

#### Guidance Regarding Gasoline Dispensing Facilities Sited Near Sensitive Receptors

SCAQMD staff recognizes that there are many factors Lead Agencies must consider when making local planning and land use decisions. To facilitate stronger collaboration between Lead Agencies and SCAQMD to reduce community exposure to source-specific and cumulative air pollution impacts, SCAQMD adopted the *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*<sup>5</sup> in 2005. Additional guidance can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Health Perspective*<sup>6</sup>. SCAQMD staff recommends that the Lead Agency review and consider these guidance when making local planning and land use decisions.

#### Compliance with SCAQMD Rules

Since the Proposed Project includes gasoline service station with 16 fueling pumps, a permit from SCAQMD would be required, and SCAQMD should be identified as a Responsible Agency for this Project in the Final MND. The assumptions in the air quality analysis in the Final MND will be the basis for permit conditions and limits.

The Final MND should also demonstrate compliance with SCAQMD Rules, including, but are not limited to, Rule 201 – Permit to Construct, Rule 203 – Permit to Operate, and Rule 461 – Gasoline Transfer and Dispensing. If there are permitting questions concerning the gasoline service station, they can be directed to SCAQMD Engineering and Permitting staff at (909) 396-2551.

#### Closing

Pursuant to 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. Please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final MND. When responding to issues raised in the comments, response should provide sufficient details giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful or useful to decision makers and to the public who are interested in the Proposed Project.

SCAQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact me at [lsun@aqmd.gov](mailto:lsun@aqmd.gov) if you have any questions.

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<sup>4</sup> South Coast Air Quality Management District. *Emission Inventory and Risk Assessment Guidelines for Gasoline Dispensing Stations*. Accessed at: <http://www.aqmd.gov/home/permits/risk-assessment>.

<sup>5</sup> South Coast Air Quality Management District. May 2005. *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*. Accessed at: <http://www.aqmd.gov/home/library/documents-support-material/planning-guidance/guidance-document>.

<sup>6</sup> California Air Resources Board. April 2005. *Air Quality and Land Use Handbook: A Community Health Perspective*. Accessed at: <http://www.arb.ca.gov/ch/handbook.pdf>.

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Sincerely,

*Lijin Sun*

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Planning, Rule Development & Area Sources

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