

## South Coast Air Quality Management District

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## <u>Review of the Draft Mitigated Negative Declaration (MND) for the</u> <u>Ravella Planned Development Project</u>

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

The Lead Agency proposes to develop an approximately 20-acre site into two separate projects: 1) an approximately five-acre commercial plaza containing three lots; and 2) a residential development. The commercial area will feature three lots: Lot 1) a 5,200 square foot market,) a 5,076 square foot fuel station with a canopy structure, and 23 spaces for parking; Lot 2) a 9,750 square foot commercial building and 42 parking spaces, and Lot 3) a 20,000 square foot commercial building that can be used as a professional office and/or retail building. The residential portion of the proposed development will occur on Lot 4 with construction of 115 dwelling units and ancillary uses (roads, four retention basins, open space and a park site).

In the air quality analyses, the Lead Agency estimated regional and localized impacts comparing the estimated emissions with the applicable SCAQMD recommended thresholds of significance. In addition, the Lead Agency cited applicable SCAQMD rules and regulations that apply during construction activities and during long-term operations. Besides the rules and regulations cited starting on page 47 in the Air Quality Section, the proposed 5,076 square foot fuel station will require a project specific evaluation of potential health risks from the potential toxic air contaminants (TAC) from the fueling emissions to sensitive receptors located near the proposed fuel station. The estimated health risks from gas station TAC emissions should then be compared to the SCAQMD thresholds. Further, the proposed construction and operation of the fuel station will also require permit applications under SCAQMD Rule 201 – Permit to Construct, Rule 203 – Permit to Operate and Rule 461 - Gasoline Transfer and Dispensing and SCAQMD should be identified as a responsible agency. Questions concerning SCAQMD permits can be directed SCAQMD Engineering and Compliance staff at (909) 396-2551. The Final MND should be revised to include the project's potential health risk impacts and include the before mentioned SCAQMD permit requirements.

Pursuant to Public Resources Code Section 21092.5, SCAQMD staff requests that the Lead Agency provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. Further, staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

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