



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

August 10, 2017

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Mitigated Negative Declaration (MND) for the Proposed CR England Expansion Project

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 construct a new 1,206-square-foot (sf) office building and an 8,720 sf fueling station canopy ("Proposed Project"). The Proposed Project is surrounded by industrial uses to the north, west, and south, and vacant land to the east.

Air Quality Analysis

In the Air Quality Analysis, the Lead Agency found that the Proposed Project's regional operational air quality impacts would be less than significant. However, the air quality analysis did not include operational ROG emissions generated from storage tanks and from the fueling process. It is important to note that while CalEEMod¹ quantifies mobile source emissions (e.g., trip visits by patrons) associated with operating a service station, CalEEMod does not quantify the operational stationary source emissions from the storage tanks and fueling equipment. SCAQMD staff believes that the MND has likely underestimated the Proposed Project's air quality impacts. Therefore, it is recommended that the Lead Agency quantify operational stationary source emissions and include the emissions in the Final MND. In the event that the Lead Agency finds, after revising the air quality analysis, that Proposed Project's operational air emissions would exceed SCAQMD's CEQA regional daily significance thresholds², SCAQMD staff recommends that the Lead Agency consider mitigation measures to reduce those significant impacts to the maximum feasible extent (CEQA Guidelines Sections 15070 to 15075 and Section 15126.4).

Permits

In the event that the fueling station will require a permit from SCAQMD, the Lead Agency should identify SCAQMD as Responsible Agency for the Proposed Project in the Final MND. Should there be any questions on permits, please contact SCAQMD's Engineering and Permitting staff at (909) 396-3385. For more general information on permits, please visit the SCAQMD's webpage, at: <http://www.aqmd.gov/home/permits>.

¹ 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.

² SCAQMD's CEQA regional daily pollutant emissions significance thresholds can be found here: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>.

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Pursuant to the 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. 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 Jack Cheng, Air Quality Specialist, CEQA IGR Section, at (909) 396-2448, if you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS:JC

SBC170725-04

Control Number