



# South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

May 24, 2017

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## **Mitigated Negative Declaration (MND) for the Proposed Inland Center Gas Station 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 32,677-square-foot gas station with twelve pumps, convenience store, and car wash on 0.78 acres (“project”). The project is surrounded by Interstate 215 to the north and east, residential dwellings to the south, and commercial uses to the west.

### Air Quality Analysis

In the Air Quality Analysis, the Lead Agency found that the 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 CalEEMod<sup>1</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. The SCAQMD staff believes that the MND has likely underestimated the 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 project operational air emissions would exceed the SCAQMD’s CEQA regional daily significance thresholds<sup>2</sup>, the SCAQMD staff recommends that the Lead Agency consider mitigation measures to reduce those impacts to the maximum extent feasible that is below significant levels in accordance with the CEQA Guidelines Sections 15070 to 15075 and Section 15126.4.

### 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 the SCAQMD to reduce community exposure to source-specific and cumulative air pollution impacts, the SCAQMD adopted the *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*<sup>3</sup> in 2005. Additionally, the California Air Resources Board’s (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective*<sup>4</sup> recommended in 2005 to avoid the siting of housing within 300 feet of a large gas station or 50 feet for a typical gas station. In April 2017, CARB

<sup>1</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)

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

<sup>3</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>4</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/landuse.htm>

released a Technical Advisory as a supplement to this Handbook<sup>5</sup>. These Guidance documents provide recommended policies that local governments can use in their General Plans or through local planning to prevent or reduce potential air pollution impacts and protect public health. The SCAQMD staff recommends that the Lead Agency review and consider these Guidance documents when making local planning and land use decisions.

### **Permits**

Based on a review of the project description, the SCAQMD staff determines that the project requires a permit from SCAQMD. On page 22 of the MND, the Lead Agency included a discussion on permit applications, and on page 3, the Lead Agency identified SCAQMD as a responsible agency for the project. Should there be any questions on permits, please contact the SCAQMD's Engineering and Permitting staff at (909) 396-3385. For more general information on permits, please visit the SCAQMD webpage, at: <http://www.aqmd.gov/home/permits>.

Pursuant to the CEQA Guidelines Section 15074, prior to approving the 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

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SBC170426-06

Control Number

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<sup>5</sup> California Air Resources Board. April 2017. "Technical Advisory: Strategies to Reduce Air Pollution Exposure near High-Volume Roadways." Accessed at: <https://www.arb.ca.gov/ch/landuse.htm>.