



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

October 10, 2017

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**Mitigated Negative Declaration (MND) for the Proposed
Main Street Plaza: Planning Cases P15-0907 (CUP), P15-0908 (CUP), P15-0909 (DR), P16-
0285 (VR), P16-0651 (VR), P17-0544 (PCRN) & P17-0646 (GE)**

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 gas station with 16 pumps and a 2,546-square-foot convenience store and carwash (Proposed Project). The Proposed Project is surrounded by commercial uses.

Compliance with SCAQMD Rules

Since the Proposed Project is a gasoline service and dispensing facility, a permit from SCAQMD would be required, and SCAQMD should be identified as a responsible agency for this project in the Final MND. 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.

Air Quality 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, the Air Quality analysis did not include operational ROG emissions generated from storage tanks or from the fueling process, which may have likely led to an under-estimation of the Proposed Project's operational air quality impacts. It is important to note that while CalEEMod¹ 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 recommended that the Lead Agency quantify operational emissions from the fueling process in the Final MND.

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

Health Risk Assessment

The Proposed Project would be sited in close proximity to existing residential uses. Benzene, which is a toxic air contaminant, may be emitted from the Proposed Project's gasoline refueling operations. SCAQMD staff is concerned about the potential health impacts on the residents from being exposed to benzene. As such, it is recommended that the Lead Agency evaluate, quantify, and perform a health risk assessment for the Proposed Project 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*².

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*³ in 2005. Additionally, the California Air Resources Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective*⁴ 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 released a Technical Advisory as a supplement to this Handbook⁵. These Guidance documents provide planning guidance and 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. Therefore, SCAQMD staff recommends that the Lead Agency review and consider these Guidance documents when making local planning and land use decisions.

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

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Control Number

² South Coast Air Quality Management District. Accessed at: <http://www.aqmd.gov/home/permits/risk-assessment>.

³ 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>.

⁴ 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>.

⁵ 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>.