



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 Zanderson Plaza 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 commercial center which includes a gasoline station with 20 gasoline pumps, convenience store, carwash, three drive-through restaurants, and 40,000 square feet of multi-tenant retail space on 8.6 acres (“proposed project”). The proposed project is surrounded by residential development to the north, east, and south, and a church to the west.

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 and from the fueling process, which has 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. Additionally, based on a review of the Air Quality Analysis and Appendix A – Air Quality-GHG Report, SCAQMD staff found that construction emissions from the “parking lot” land use were not calculated. Therefore, it is recommended that the Lead Agency quantify construction emissions from the parking lot, as well as operational emissions from the fueling process in the Final MND. In the event that the Lead Agency finds, after revising the Air Quality analysis, that the proposed project’s construction and operational emissions would exceed SCAQMD’s regional air quality CEQA significance thresholds for operation², SCAQMD staff recommends that the Lead Agency consider mitigation measures to reduce those impacts to the maximum extent feasible in accordance with the CEQA Guidelines Sections 15070 to 15075 and 15126.4.

Permits and 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 under CEQA for the proposed project. 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. 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 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 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>

Guidance Regarding Gasoline Dispensing Facilities Sited Near Sensitive Receptors

Based on a review of the Project Description and aerial photographs, SCAQMD staff found that residential uses are located immediately north, east, and south of the proposed project. 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 avoiding 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 recommendations 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. 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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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>.