



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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City of Menifee Community Development Department

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Mitigated Negative Declaration (MND) for the Proposed McCall Square Project

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 CEQA document.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to construct seven self-storage buildings totaling 150,541 square feet and an 84,200-square-foot retail center including a six-pump gas station on 18.1 acres. The project is located on the northwest corner of Menifee Road and McCall Boulevard in the City of Menifee.

SCAQMD Staff's Comments

The Lead Agency determined the proposed project would have less than significant impacts to regional and localized air quality during construction and operation.¹ However, it does not appear that operational air quality impacts were adequately analyzed. Additionally, the proposed project will need to obtain a SCAQMD permit for operation.

Operational Impacts

Upon review of the MND, it does not appear that the air quality analysis included operational ROG emissions generated from storage tanks or from the fueling process. This may have likely led to an under-estimation of the proposed project's operational air quality impacts. Therefore, it is recommended that the Lead Agency quantify and disclose operational emissions from the fueling process in the final CEQA document. Additionally, since the proposed project includes the operation of a gas station, the project has the potential to expose nearby sensitive receptors to toxic air contaminants, such as benzene.² SCAQMD staff has concerns about the potential health impacts on sensitive receptors. Therefore, it is recommended that the Lead Agency prepare a Health Risk Assessment (HRA) and determine the level of significance in the final CEQA document.³ Guidance for this analysis can be found in the SCAQMD's *Emission Inventory and Risk Assessment Guidelines for Gasoline Dispensing Stations*.⁴

¹ MND, Air Quality and Greenhouse Gases Appendices, Chapter 6 Air Quality Impact Analysis.

² Sensitive receptors are 25 meters away. MND, Air Quality and Greenhouse Gases Appendices, Chapter 4, Page 4.

³ SCAQMD has developed the CEQA significance threshold of 10 in one million for cancer risk. When SCAQMD acts as the Lead Agency for its own projects or Responsible Agency for permit projects, SCAQMD staff conducts a HRA, compares the maximum cancer risk to the threshold of 10 in one million to determine the level of significance for health risk impacts, and identifies mitigation measures if the risk is found to be significant. Health risks from operating a gasoline service station must be demonstrated to be below 10 in one million before a permit can be issued.

⁴ SCAQMD's *Emission Inventory and Risk Assessment Guidelines for Gasoline Dispensing Stations*. Accessed at: <http://www.aqmd.gov/home/permits/risk-assessment>

SCAQMD Permits and Rules

Pursuant to SCAQMD's Rule 461 – Gasoline Transfer and Dispensing, a permit from SCAQMD would be required, and SCAQMD should be identified as a responsible agency under CEQA for the proposed project in the final CEQA document. Additionally, since the operation of gasoline stations emit toxics air contaminants, HRAs are required as part of the SCAQMD permitting requirements under SCAQMD's Rule 1401 – New Source Review of Toxic Air Contaminants.⁵ Any assumptions used in the air quality and HRA analysis in the final CEQA document will be used as the basis for permit conditions and limits. The final CEQA document should also demonstrate compliance with applicable SCAQMD Rules, including, but not limited to, Rule 201 – Permit to Construct, Rule 203 – Permit to Operate.

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>.

Response to Comments

Pursuant to CEQA Guidelines Section 15074, prior to approving the proposed project, the Lead Agency shall consider the final CEQA document for adoption together with any comments received during the public review process. Please provide the SCAQMD with written responses to the comment contained herein prior to the adoption of the final CEQA document. When responding to issues raised in the comments, response should provide sufficient details giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful or useful to decision makers and the public who are interested in the proposed project.

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 Alina Mullins, Assistant Air Quality Specialist, at amullins@aqmd.gov or (909) 396-2402, should you have any questions.

Sincerely,

Jillian Wong

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⁵ SCAQMD's Rule 1401 – New Source Review of Toxic Air Contaminants. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf>