



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 Commonwealth Crossing

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 develop a total of 48,972 square feet of office and retail uses including a gasoline station with 12 fueling pumps on 9.51 acres (Proposed Project). Based on a review of aerial photographs and Figure A, *Aerial Map*¹, in the MND and aerial photographs, SCAQMD staff found that residential uses are located immediately to the north, southwest, and west of the Proposed Project.

Compliance with SCAQMD Rules

Since the Proposed Project includes gasoline service station, a permit from SCAQMD would be required, and SCAQMD should be identified as a Responsible Agency for this Project in the Final MND. The assumptions in the air quality analysis in the Final MND will be the basis for permit conditions and limits.

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 and localized construction and operational air quality impacts would be less than significant. However, it does not appear that the Air Quality analysis include 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. It is important to note that while CalEEMod² 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 use its best efforts to quantify and disclose operational emissions from the fueling process in the Final MND.

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

¹ MND. Page 13.

² 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.

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*³.

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 SCAQMD to reduce community exposure to source-specific and cumulative air pollution impacts, SCAQMD adopted the *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*⁴ in 2005. Additionally, it is recommended that a 50-foot separation between a gasoline dispensing facility and sensitive land uses (e.g., residential uses)⁵. SCAQMD staff recommends that the Lead Agency review and consider these guidance when making local planning and land use decisions.

Closing

Pursuant to 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. Please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final MND. 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 to 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 me at lsun@aqmd.gov 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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³ South Coast Air Quality Management District. Accessed at: <http://www.aqmd.gov/home/permits/risk-assessment>.

⁴ 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>.

⁵ California Air Resources Board. 2005. *Air Quality and Land Use Handbook: A Community Health Perspective*. Page 4. Accessed at: <https://www.arb.ca.gov/ch/handbook.pdf>.