



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 Coachella Travel Centre Project

South Coast Air Quality Management District (South Coast AQMD) 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 MND.

South Coast AQMD Staff's Summary of Project Description

The Lead Agency proposes to construct a 3,800-square-foot convenience store, a gasoline service station with 10 pumps, two restaurants totaling 8,088 square feet, and an 11,259-square-foot hotel with 116 rooms on 14.1 acres (Proposed Project). The Proposed Project is located on the southeast corner of Avenue 50 and State Route 86 within the City of Coachella. Construction is anticipated to begin in December 2019, and the Proposed Project will be operational by January 2021¹. Upon review of the Transportation/Traffic Section, South Coast AQMD staff found that the Proposed Project is expected to generate 3,040 trips per day². Sensitive receptors are located within 400 feet of the Proposed Project³.

Permits and Compliance with South Coast AQMD Rules

Since the Proposed Project includes the operation of a gasoline service station with 10 pumps, a permit from South Coast AQMD will be required, and South Coast AQMD should be identified as a Responsible Agency under CEQA for the Proposed Project in the Final MND. Should there be any questions on permits, please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385. For more general information on permits, please visit South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>. The Final MND should also include a discussion of compliance with applicable South Coast AQMD Rules, including, but not limited to, Rule 201 – Permit to Construct⁴, Rule 203 – Permit to Operate⁵, Rule 461 – Gasoline Transfer and Dispensing⁶ and Rule 1401 – New Source Review of Toxic Air Containments⁷. Any assumptions used in the Air Quality and Health Risk Assessment (HRA) analyses in the Final MND will be used as the basis for permit conditions and limits.

¹ MND. Environmental Checklist Form. Page 3.

² *Ibid.* XVI Transportation/Traffic. Pages 54 through 55.

³ *Ibid.* III Air Quality. Page 26.

⁴ South Coast AQMD. Rule 201 – Permit to Construct. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>.

⁵ South Coast AQMD. Rule 203 – Permit to Operate. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>.

⁶ South Coast AQMD. Rule 461 – Gasoline Transfer and Dispensing. Accessed at: <https://www.aqmd.gov/docs/default-source/compliance/Gas-Dispensing/rule-461.pdf>.

⁷ South Coast AQMD. 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>.

The 2015 revised Office of Environmental Health Hazard Assessment (OEHHA) methodology⁸ is being used by South Coast AQMD for determining operational health impacts for permitting applications and also for all CEQA projects where South Coast AQMD is the Lead Agency. If there is any information in the permitting process suggesting that the Proposed Project would result in significant adverse air quality impacts not analyzed in the Final MND or substantially more severe air quality impacts than those analyzed in the Final MND, the Lead Agency should commit to reevaluating the Proposed Project's air quality and health risks impacts through a CEQA process (CEQA Guidelines Section 15162).

South Coast AQMD Staff's Summary of the Air Quality Analysis

In the Air Quality Analysis Section, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared those emissions to South Coast AQMD's recommended regional and localized air quality CEQA significance thresholds. Based on the analyses, the Lead Agency found that the Proposed Project's regional and localized air quality impacts would be less than significant⁹. However, it did not appear that the operational Air Quality Analysis was consistent with the information presented in the Transportation/Traffic section of the MND. Additionally, it did not appear that the Air Quality Analysis included operational ROG emissions from storage tanks and from the fueling process or a Health Risk Assessment (HRA) to disclose the health risks from the Proposed Project's gasoline service station. Please see the attachment for more information.

Conclusion

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 South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, responses 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, informative, or useful to decision makers and the public who are interested in the Proposed Project. Further, if the Lead Agency makes a finding that additional recommended mitigation measures are not feasible, the Lead Agency should describe the specific reasons for rejecting or substituting these mitigation measures in the Final MND (CEQA Guidelines Section 15074.1).

South Coast AQMD 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,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment
LS:AM
RVC190509-03
Control Number

⁸ Office of Environmental Health Hazard Assessment. "Notice of Adoption of Air Toxics Hot Spots Program Guidance Manual for the Preparation of Health Risk Assessments 2015". Accessed at: <https://oehha.ca.gov/air/crmr/notice-adoption-air-toxics-hot-spots-program-guidance-manual-preparation-health-risk-0>.

⁹ MND. III Air Quality, Pages 24 through 27.

ATTACHMENT**Air Quality Analysis – Operational Emissions***Daily Trip Rates*

1. Upon review of the Air Quality Analysis section and Appendix 1: *Air Quality and GHG Impact Analyses*, South Coast AQMD staff found that the Lead Agency adjusted the CalEEMod default vehicle trips to be less than what was generated by CalEEMod. These changes resulted in a trip generation of 1,802 vehicle trips¹⁰. The Lead Agency justified the change by stating that, “trip rates [are] provided by [the] applicant¹¹”. CalEEMod generates trip rates based on land use types selected by the user. If a user changes the trip rates associated with a land use type, this should be substantiated by a project specific traffic study. Upon a review of the Transportation/Traffic section in the main body of the MND, the Lead Agency states that the Proposed Project would generate an average 3,040 trips per day¹². Modeling 1,802 trips when the Proposed Project is expected to generate 3,040 trips may have likely led to an underestimation of the Proposed Project’s operational air quality impacts from mobile sources. Therefore, to be consistent with the daily trips in the Transportation and Traffic section, South Coast AQMD staff recommends that the Lead Agency use the project specific traffic study information (e.g., 3,040 trips per day) in CalEEMod to quantify the Proposed Project’s operational air emissions. Alternatively, the Lead Agency may use the default trip rates that are generated by CalEEMod.

ROG Emissions from Storage Tanks or Fueling Process

2. Upon a review of the Air Quality Analysis, it did not appear that the air quality analysis included operational ROG emissions generated from storage tanks or from the fueling process during operation. This may have likely led to an under-estimation of the Proposed Project’s operational air quality impacts. Although South Coast AQMD Rule 461 – Gasoline Transfer and Dispensing requires the use of California Air Resources Board certified Phase I and Phase II enhanced vapor recovery systems with minimum volumetric efficiencies of 98% and 95%, respectively¹³, ROG emissions are not entirely eliminated from the fueling process and should be included when quantifying the Proposed Project’s operational emissions. As an informational document, the Final MND should, at a minimum, include a discussion on potential operational air quality impacts from the fueling process. The Lead Agency should use its best efforts to quantify and disclose ROG emissions from the fueling process in the Final MND. If there is no substantial evidence to support a quantitative analysis of ROG emissions from the fueling process, the Lead Agency should disclose the reasons supported by factual information in the Final MND. It is also important to note that while CalEEMod¹⁴ 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.

¹⁰ *Ibid.* Page 27; and Appendix 1 Air Quality and GHG Impact Analyses. CalEEMod Annual, Summer, and Winter Runs.

¹¹ *Ibid.*

¹² MND. XVI Transportation/Traffic. Pages 54 through 55.

¹³ South Coast AQMD. Rule 461 – Gasoline Transfer and Dispensing. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-461.pdf>.

¹⁴ 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.

Air Quality Analysis – Health Risk Assessment (HRA)

3. Sensitive receptors are people that have an increased sensitivity to air pollution or environmental contaminants. Sensitive receptors include schools, daycare centers, nursing homes, elderly care facilities, hospitals, and residential dwelling units. As stated above, the Proposed Project includes, among others, the operation of a gasoline service station. The Proposed Project has the potential to expose nearby residents located within 400 feet of the Proposed Project to toxic air contaminants, such as benzene, which is a known carcinogen. South Coast AQMD staff has concerns about the potential health impacts to sensitive receptors from the exposures to benzene during the operation of the Proposed Project. Therefore, to facilitate informed decision-making and public participation with useful information about the Proposed Project's potential long-term health impacts to nearby residents, it is recommended that the Lead Agency prepare a Health Risk Assessment (HRA) analysis to disclose the health risks in the Final MND and include feasible mitigation measures if the cancer risk is found to be significant¹⁵. Guidance for performing a Health Risk Assessment can be found on South Coast AQMD's website¹⁶.

Additional Recommended Mitigation Measures

4. In the event that, upon revisions to the Air Quality Analysis based on Comment Nos. 1 through 3, the Lead Agency finds that the Proposed Project would result in significant adverse air quality and health risks impacts from operation, mitigation would be required (CEQA Guidelines Section 15126.4.). Therefore, South Coast AQMD staff has compiled a list of recommended mitigation measures as suggested resources and guidance to the Lead Agency to assist in the identification of feasible mitigation measures for incorporation in the Final MND. For more information on potential mitigation measures as guidance to the Lead Agency, please visit South Coast AQMD's CEQA Air Quality Handbook website¹⁷.

Mitigation Measures for Operational Air Quality Impacts from Mobile Sources

- Provide incentives for vendors and material delivery trucks that would be visiting the hotel to encourage the use of zero-emission or near-zero emission heavy-duty trucks during operation, such as trucks with natural gas engines that meet CARB's adopted optional NOx emissions standard of 0.02 grams per brake horsepower-hour (g/bhp-hr). At a minimum, incentivize the use of 2010 model year¹⁸ or newer engines that meet CARB's 2010 engine emission standards of 0.01 g/bhp-hr for particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks. Include analyses to evaluate and identify sufficient power available for zero emission trucks and supportive infrastructures in the Energy and Utilities and Service Systems Sections of the Final MND, where appropriate.

¹⁵ South Coast AQMD has developed the CEQA significance threshold of 10 in one million for cancer risk. When South Coast AQMD acts as the Lead Agency, South Coast AQMD 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. The 2015 OEHHHA methodology is being used by South Coast AQMD for determining operational health impacts for permitting applications and also for all CEQA projects where South Coast is the lead agency.

¹⁶ South Coast AQMD. Risk Assessment Procedures for Rules 1401. Accessed at: <http://www.aqmd.gov/home/permits/risk-assessment>.

¹⁷ South Coast Air Quality Management District. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

¹⁸ CARB adopted the statewide On-Road Truck and Bus Regulation in 2010. The Regulation requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent. More information on the CARB's Truck and Bus Regulations is available here: <https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm>.

- Provide electric vehicle (EV) charging stations for the hotel and restaurant uses. Require at least 5% of all vehicle parking spaces include EV charging stations, or at a minimum, require the Proposed Project to be constructed with the appropriate infrastructure to facilitate sufficient electric charging for passenger vehicles and trucks to plug-in. Electrical hookups should be provided at the onsite truck stop for truckers to plug in any onboard auxiliary equipment. Electrical panels should be appropriately sized to allow for future expanded use. The Lead Agency should also include analyses to evaluate and identify sufficient power available for zero emission trucks and supportive infrastructures (e.g., EV charging stations) in the Energy and Utilities and Service Systems Sections of the Final MND, where appropriate.
- Provide incentives for employees working at the proposed retail uses to encourage the use of public transportation or carpooling, such as discounted transit passes or carpool rebates.
- Implement a rideshare program for employees working at the proposed retail uses and set a goal to achieve a certain participation rate over a period of time.

Mitigation Measures for Operational Air Quality Impacts from Area Sources

- Maximize the use of solar energy including solar panels. Installing the maximum possible number of solar energy arrays on the building roofs and/or on the Proposed Project site to generate solar energy for the facility and/or EV charging stations.
- Require the use of electric landscaping equipment, such as lawn mowers and leaf blowers.
- Require use of electric or alternatively fueled sweepers with HEPA filters.
- Maximize the planting of trees in landscaping and parking lots.
- Use light colored paving and roofing materials.
- Utilize only Energy Star heating, cooling, and lighting devices, and appliances.