



# 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 Kassab Travel Center 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 MND.

### SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to construct an 8,360-square-foot convenience store, 6,092 square feet of gasoline dispensing area with 18 pumps, and a 2,543-square-foot restaurant on 2.84 acres (Proposed Project). The Proposed Project is located near the southwest corner of Riverside Drive and Collier Avenue in the City of Lake Elsinore, Riverside County, California. Construction of the Proposed Project is expected to begin late 2019 with grading activities and end by late 2020<sup>1</sup>.

### Permits and Compliance with SCAQMD Rules

Since the Proposed Project includes the operation of a gasoline station with 18 pumps, a permit from SCAQMD will be required, and SCAQMD should be identified as a Responsible Agency for the Proposed Project in the Final MND. In addition to the discussion on SCAQMD Rule 461<sup>2</sup>, the Final MND should include discussions to demonstrate compliance with applicable SCAQMD Rules, including, but not limited to, Rule 201 – Permit to Construct<sup>3</sup>, Rule 203 – Permit to Operate<sup>4</sup>, and Rule 1401 – New Source Review of Toxic Air Containments<sup>5</sup>. Additionally, based on a review of the MND, SCAQMD staff found that the Proposed Project's operations-related toxic air contaminant impacts analysis was based on an assumption of "a throughput of 2 million gallons of gasoline per year"<sup>6</sup>. It is important to note that 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. The 2015 revised Office of Environmental Health Hazard Assessment (OEHHA) methodology is being used by SCAQMD for determining operational health impacts for permitting applications and also for all CEQA projects where SCAQMD is the Lead Agency. 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>.

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<sup>1</sup> MND. Page 8.

<sup>2</sup> MND. Page 63.

<sup>3</sup> South Coast Air Quality Management District. Rule 201 – Permit to Construct. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>.

<sup>4</sup> South Coast Air Quality Management District. Rule 203 – Permit to Operate. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>.

<sup>5</sup> South Coast Air Quality Management District. 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>.

<sup>6</sup> MND. Page 61.

Air Quality and Health Risk Assessment Analyses

In the Air Quality Analysis section, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared those emissions to SCAQMD'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 construction and operational air quality impacts would be less than significant. However, 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. It is important to note that while CalEEMod<sup>7</sup> 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 clarify if the Proposed Project's operational ROG emissions from storage tanks and the fueling process have been included in the Air Quality Analysis, or use best efforts to quantify and disclose operational emissions from the fueling process in the Final MND.

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 SCAQMD with written responses to all comments contained herein prior to the adoption 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, informative, 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 me at [lsun@aqmd.gov](mailto:lsun@aqmd.gov), should you have any questions.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

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<sup>7</sup> 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](http://www.caleemod.com).