



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Review of the Draft Mitigated Negative Declaration (MND) for the Proposed City Hub Center at Valley and Pepper Project

The 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.

According to the project description, the Lead Agency proposes to construct a new commercial center that includes a 6,000 square foot restaurant, a 9,000 square foot retail building, a 3,500 square foot quick service restaurant, a 6,500 square foot gas station with a convenience market, a 4,800 square foot drive thru car wash, a 90 room four story hotel located at the northwest corner Valley Boulevard and Pepper Avenue in City of Colton in San Bernardino County.

The SCAQMD staff has concerns regarding the regional significance threshold analyses for operation emission estimates. In addition, the SCAQMD staff has comments regarding the sensitive receptors and mitigation measures used in the evaluation of air quality and health risk impacts. Further details are in the attachment.

Pursuant to Public Resources Code Section 21092.5, SCAQMD staff requests that the Lead Agency provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the final CEQA document. Further, staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Sam Wang, Air Quality Specialist – CEQA Section, at (909) 396-2649, if you have any questions regarding these comments.

Sincerely,

Jillian Wong

Jillian Wong, Ph.D.
Program Supervisor
Planning, Rule Development & Area Sources

Attachment

JW:GM:SW
SBC160224-01
Control Number

Attachment

Regional and Localized Emission Estimates

1. Based on Table III.2. on page IS-16 of the Draft MND, the totals from the “area source emissions” and “commercial/hotel center” emissions do not equal the “total operational emissions”. Furthermore, the Lead Agency did not provide SCAQMD staff with the CalEEMod input and output files which are crucial to SCAQMD staff’s ability to review the air quality analysis for accuracy and completeness. SCAQMD staff recommends that the Lead Agency include the CalEEMod output files as an Appendix and revise Table III.2. in the Final MND, in order to provide substantial evidence for the air quality impacts.
2. In the Draft MND, the Lead Agency did not evaluate localized air quality impacts from the project. An inspection of aerial maps and the surrounding land uses section on page IS-2 note that the proposed project is located within one-quarter mile of a sensitive receptor, the San Bernardino County Hospital, east of the project site. Therefore, the SCAQMD staff recommends that the Lead Agency evaluate localized air quality impacts to ensure that any nearby sensitive receptors are not adversely affected by the construction and operational activities that are occurring in close proximity. SCAQMD guidance for performing a localized air quality analysis can also be found at the SCAQMD website¹. Should the Lead Agency conclude after its analyses that construction or operational air quality impacts exceed the SCAQMD daily significance thresholds, staff has compiled mitigation measures² to be implemented, in addition to the measures listed starting on page IS-14 in the Draft MND, if the air quality impacts are determined to be significant.

Gas Station Impacts and SCAQMD Permitting Requirements

3. According to the project description, a 6,500 square foot gas station with a convenience market will be constructed. Since gas stations are known to have emissions of toxic air contaminants (TAC), the Lead Agency should include a project specific HRA to disclose the health risks from TAC emissions from the gas station and compare those health risks to the SCAQMD threshold.
4. Since the proposed project description includes gasoline dispensing equipment, which requires a SCAQMD permit to construct and operate, the Lead Agency should list SCAQMD as a CEQA responsible agency and describe compliance with SCAQMD Rule 461 - Gasoline Transfer and Dispensing in the Final CEQA document. Questions concerning SCAQMD permits for the equipment can be directed SCAQMD Engineering and Compliance staff at (909) 396-2551.

¹ <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>

² <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>