



# South Coast Air Quality Management District

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**Initial Study/Mitigated Negative Declaration (IS/MND) for the  
Sandalwood Travel Center and Tentative Parcel Map 38215 Project  
(Proposed Project)  
(SCH No: 2026020244)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to review the above-mentioned document. City of Calimesa is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff have provided a brief summary of the project information and prepared the following comments, which are organized by topic of concern.

Summary of Proposed Project Information in the IS/MND

Based on the IS/MND, the Proposed Project comprises two primary components: a Tentative Parcel Map (TPM) to subdivide an approximately 11.2-acre site into three parcels, and subsequent commercial development within the subdivided area.<sup>1</sup> The Sandalwood Travel Center, under the commercial development, would be constructed on Parcel 3 of the approved TPM.<sup>2</sup> The Sandalwood Travel Center would include four multi-product fuel dispensers (MPDs), a convenience store with associated common area, a diesel fueling canopy accommodating five fueling positions with six dispensers, on-site parking, site access and circulation improvements, and associated signage.<sup>3</sup> The Proposed Project also includes approximately 1.9 acres of off-site improvements.<sup>4</sup> The project site is bounded by 7th Street to the west, Sandalwood Drive to the south, and Interstate 10 (I-10) to the east.<sup>5</sup> A review of aerial imagery indicates that the nearest sensitive receptor (e.g., residential land use) is located less than 100 feet northwest of the overall project site boundary and approximately 900 feet northwest of the Sandalwood Travel Center development footprint. Construction of the Proposed Project is anticipated to commence in 2026 and would occur over an approximately 12-month period.<sup>6</sup>

South Coast AQMD Comments

*Completion of CEQA Air Quality Impacts Analysis During Operation Activities*

Section 3.3 (Air Quality) of the IS/MND includes an evaluation of construction-related emissions relative to the applicable Localized Significance Thresholds (LSTs). However, the IS/MND does not

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<sup>1</sup> IS/MND, p. 3.

<sup>2</sup> *Ibid.*

<sup>3</sup> *Ibid.* p. 4.

<sup>4</sup> *Ibid.* p. 5.

<sup>5</sup> *Ibid.* p. 3.

<sup>6</sup> *Ibid.* p. 5.

provide a corresponding LST analysis for project operational emissions. Pursuant to Section 15064 of the CEQA Guidelines (Determining the Significance of the Environmental Effects Caused by a Project), the Lead Agency is responsible for conducting a thorough and evidence-based assessment of the Project's potential environmental impacts, including both regional and localized air quality effects. In the absence of an operational LST analysis, the document does not fully evaluate potential localized impacts to nearby sensitive receptors during long-term project operation.

Therefore, the Lead Agency is recommended to revise the IS/MND to include a table summarizing the maximum daily on-site operational emissions, as calculated using the California Emissions Estimator Model (CalEEMod).<sup>7</sup> These emissions should then be compared to the applicable South Coast AQMD LSTs to determine whether localized operational impacts would exceed established thresholds of significance and include the results in the Final MND. The localized impact assessment may be conducted using the South Coast AQMD LST screening tables, where applicable, or through refined dispersion modeling, depending on project characteristics and receptor proximity. Incorporating this analysis will provide a comprehensive evaluation of the Proposed Project's potential air quality impacts at both the regional and localized levels, consistent with CEQA requirements and best practices in air quality analysis.

### *South Coast AQMD Air Permits and Role as a Responsible Agency*

Since the Proposed Project consists of four MPDs capable of dispensing both gasoline and diesel fuel, as well as a five-position diesel fueling canopy with six dispensers, one or more air permits from South Coast AQMD will be required. The Final MND should include a discussion about the potentially applicable rules that the Proposed Project needs to comply with. Those rules may include, for example, Rule 201 – Permit to Construct,<sup>8</sup> Rule 203 – Permit to Operate,<sup>9</sup> Rule 401 – Visible Emissions,<sup>10</sup> Rule 402 – Nuisance,<sup>11</sup> Rule 403 – Fugitive Dust,<sup>12</sup> Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,<sup>13</sup> Rule 1113 – Architectural Coating, Regulation XIII – New Source Review,<sup>14</sup> Rule 1401 – New Source Review of Toxic Air Contaminants,<sup>15</sup> Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines,<sup>16</sup> etc. It is important to note that when air permits from the South Coast AQMD are required, the role of the South Coast AQMD would change from a Commenting Agency to a Responsible Agency under CEQA. In addition, if South Coast AQMD is identified as a Responsible Agency, per CEQA Guidelines Sections 15086, the Lead Agency is required to consult with South Coast AQMD.

CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of the process for conducting a review of the Proposed Project and issuing discretionary approvals. Moreover, it is important to note that if a Responsible Agency determines that a CEQA document is not adequate to rely upon for its discretionary approvals, the Responsible Agency must take further actions listed in CEQA Guideline Section 15096(e), which could have the effect of delaying the implementation of the Proposed Project.

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<sup>7</sup> CalEEMod is available free of charge at: [www.caleemod.com](http://www.caleemod.com).

<sup>8</sup> South Coast AQMD. Rule 201 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>

<sup>9</sup> South Coast AQMD. Rule 203 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>

<sup>10</sup> South Coast AQMD. Rule 401 available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf>

<sup>11</sup> South Coast AQMD. Rule 402 available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>

<sup>12</sup> South Coast AQMD. Rule 403 available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403>

<sup>13</sup> South Coast AQMD. Rule 1110.2 available at: [https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110\\_2.pdf](https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf)

<sup>14</sup> South Coast AQMD. Regulation XIII available at: <https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii>

<sup>15</sup> South Coast AQMD. Rule 1401 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf>

<sup>16</sup> South Coast AQMD. Rule 1470 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf>

In its role as CEQA Responsible Agency, the South Coast AQMD is obligated to ensure that the CEQA document prepared for this Proposed Project contains a sufficient project description and analysis to be relied upon in order to issue any discretionary approvals that may be needed for air permits. South Coast AQMD is concerned that the project description and analysis in its current form in the MND is inadequate to be relied upon for this purpose.

For these reasons, the final CEQA document should be revised to include a discussion about any and all new stationary and portable equipment requiring South Coast AQMD air permits, provide the evaluation of their air quality and greenhouse gas impacts, and identify South Coast AQMD as a Responsible Agency for the Proposed Project as this information will be relied upon as the basis for the permit conditions and emission limits for the air permit(s). Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions regarding what types of equipment would require air permits. For more general information on permits, please visit South Coast AQMD's webpage at <https://www.aqmd.gov/home/permits>.

### Conclusion

The Lead Agency is recommended to revise the CEQA analysis to address the aforementioned comments and provide the necessary evidence to sufficiently support the conclusions reached. If the requested information and analysis are not included in the final CEQA document, either the Final MND or other type of CEQA document, the Lead Agency should provide reasons for not doing so. Pursuant to California Public Resources Code Section 21092.5(b) and 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 and notify each public agency when any public hearings are scheduled. 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, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided. In addition, if the Lead Agency decides to adopt the Final MND, please provide South Coast AQMD with a notice of any scheduled public hearing(s).

Thank you for the opportunity to provide comments. 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 Danica Nguyen, Air Quality Specialist, at [dnguyen1@aqmd.gov](mailto:dnguyen1@aqmd.gov) should you have any questions.

Sincerely,

*Sam Wang*

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Planning, Rule Development & Implementation

SW:DN

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