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**Draft Initial Study/Mitigated Negative Declaration (IS/MND) for Washington Plaza Project (Proposed Project) (SCH No.: 2026100085)**

South Coast Air Quality Management District (South Coast AQMD) Staff appreciate the opportunity to review the above-mentioned document. The City of Murrieta 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 Draft MND

Based on the Draft IS/MND[1], the Proposed Project is a proposed commercial development on a 3.4-acre vacant site located at the southeast corner of Washington Avenue and Magnolia Street in the City of Murrieta, California. The project proposes approximately 14,106 square feet of commercial retail and service uses across three main structures:

- **Fast-Food Restaurant with Drive-Through:** An approximately 4,456-square-foot quick-service restaurant
- **Express Automated Car Wash:** An approximately 4,150-square-foot single-tunnel facility
- **Convenience Store:** An approximately 4,000-square-foot retail market
- **Fast-Food Retail:** An approximately 1,500-square-foot food retail space attached immediately north of the convenience store
- **Gas Station:** Fueling area featuring eight fuel pumps (16 vehicle fueling positions) under an overhead canopy, supported by two underground storage tanks (25,000-gallon and 22,000-gallon capacities)
- **Parking Area:** Provides 100 parking spaces

The Proposed Project is located at 24020 and 24070 Washington Avenue and 41908 Magnolia Street, with the surrounding boundaries and adjacent land uses identified as follows[2]:

[1] Washington Plaza Project, Initial Study/Mitigated Negative Declaration. *p.* 1.
[2] *Ibid*. *p.* 4.

- **North Boundary:** Adjacent to Magnolia Street and existing single-family residential development
- **South Boundary:** Adjacent to vacant parcels proposed for a 95-unit workforce housing project and future residential development
- **East Boundary:** Adjacent to an existing single-family residence with associated outbuildings
- **West Boundary:** Adjacent to Washington Avenue and the Murrieta Valley High School campus

Based on a review of aerial photographs, South Coast AQMD Staff found that the nearest sensitive receptor (e.g., residential development) is a single-family residence located at 41900 Magnolia Street, adjacent to the Proposed Project site's east boundary.[3]

Construction of the Proposed Project is anticipated to occur in July 2026, over a 6-month period.

## South Coast AQMD Comments

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

Since the Proposed Project would include a gas station with eight fuel pumps and two underground storage tanks, air permits from South Coast AQMD will be required. 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. 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.

[3] Washington Plaza Project, Appendix A – Air Quality, Greenhouse Gas Emissions, and Energy Supporting Information, Health Risk Assessment. *p*. 14.

*Inconsistency in Application of CalEEMod Default Values for Construction Haul Trip Emissions*

Based on South Coast AQMD reviews of the Draft IS/MND Appendix A, the analysis appears to contain an inconsistency in application of CalEEMod default values in calculation of construction haul trips emissions. The Draft IS/MND states that CalEEMod defaults were used for hauling trips calculations[4] (i.e., a standard haul truck trip of 20 miles). However, upon South Coast AQMD Staff's review of all the landfills listed in the Draft IS/MND Table 10 as potential destination for solids disposal, none of the listed landfills are located within 20 miles of the Proposed Project site.

Therefore, Lead Agency is suggested to review and clarify this discrepancy and ensure that the estimated emissions associated with grading activities are based on accurate and consistent calculations.

*Incompatible Land Use Issue Based on CARB's Guidance: Sitting a Gasoline Dispensing Facility Within Close Proximity to Existing and New Sensitive Land Uses (Residential Areas)*

South Coast AQMD is concerned about the potential health impacts of placing gasoline dispensing facilities in close proximity to existing and new sensitive land uses (proposed high-density residential areas), since refueling at gasoline dispensing facilities releases benzene into the air. Benzene is a potent carcinogen and one of the highest risk air pollutants regulated by CARB as a toxic air contaminant. While gasoline dispensing facilities account for a small part of total benzene emissions and the impact from these facilities decreases rapidly as the distance from the facility increases, pollution levels in the immediate vicinity of these facilities may be higher than in the surrounding area. Based on a review of aerial photographs, South Coast AQMD Staff found that the nearest sensitive receptor is a single-family residence located at 41900 Magnolia Street, adjacent to the Proposed Project site's east boundary. According to CARB guidance, a 50 ft. separation is recommended for typical gas dispensing facilities.[5]

Consequently, the Lead Agency is recommended to follow CARB's land-use guidance to ensure that sensitive receptors are not heavily affected by the gasoline dispensing activities and freeway emissions. Moreover, given the multi-use intensity of the Proposed Project (i.e., gas station, drive-thru, and car wash), the Lead Agency is recommended to consider for additional operational air quality protections, such as a physical vapor barrier wall, thick vegetative buffers, or on-site air quality monitoring. By adhering to the CARB's guidance document and implementing proactive mitigation measures (MMs), the Lead Agency can avoid, eliminate or reduce the adverse impacts of activities at gasoline dispensing facilities on public health, ensuring that vulnerable communities are adequately protected from disproportionate exposure to air pollution.

*Recommended Revision to Mitigation Measure (MM) for Construction*

The air quality analysis in the Draft IS/MND concludes that the Proposed Project's unmitigated construction diesel particulate matters (DPM) emissions have the potential to exceed the South Coast AQMD significance threshold for cancer risk of 10 in one million. CEQA also requires that

[4] *Ibid*. *p*. 19.

[5] CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* can be found at: ARB's Community Health: 2005-04-00 ARB's Air Quality and Landuse Handbook: A Community Health Perspective

all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse air quality impacts.

While implementation of mitigation measure MM HRA-1, which mandates utilization of Tier 4 Final for all diesel-fueled offroad construction equipment, would bring the risk down to 1.51 in one million, it may not comprehensively outline the enforceability and verifiability procedure for the Lead Agency to ensure contractor's compliance.

Thus, the Lead Agency is recommended to consider strengthening the mitigation measure MM HRA-1 by establishing explicit, enforceable verification protocols, to ensure that all diesel-fueled off-road machinery strictly satisfies Tier 4 Final emissions standards. This could include pre-construction submittal of certified Tier 4 Final engine serial numbers, daily on-site equipment logs, immediate stop-work penalties, or mandating an independent third-party inspection process and unannounced site audits to enforce mitigation measure MM HRA-1.

To further reduce construction-related emissions in a disproportionately impacted community, it is recommended that the Lead Agency takes the following mitigation measures into consideration:

- Participating in CARB's California Clean Construction (CCC) program[6], including use of the zero-emission off-road construction equipment where feasible, and use of cleanest available diesel technology for diesel equipment used
- Promoting use of zero- or near-zero emission construction equipment where feasible
- Implementing enhanced dust control measures (e.g., soil stabilizers, paving unpaved roads)
- Limiting idling of diesel equipment and designating staging activities away from sensitive receptors
- Providing community notifications regarding construction schedules and dust-generating activities

**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 explaining 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 are available to work with the Lead Agency to address any air quality questions that may arise from this comment

[6] CARB's California Clean Construction (CCC) program is available at: https://ww2.arb.ca.gov/california-clean-construction-program

letter. Please contact Zoya Banan, PhD., Air Quality Specialist, at ZBanan@aqmd.gov or me at SWang1@aqmd.gov should you have any questions.

Sincerely,

*Sam Wang*

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