

June 5, 2019

Mr. Daniel Casey
City of Rialto
Planning Division
150 S. Palm Avenue
Rialto, CA 92376

SUBJECT: Response to SCAQMD Comments on IS/MND for Riverside & Randall Gas Station Project

Dear Daniel:

This letter is in response to the City's request for Lilburn Corporation to provide a Response to Comment for South Coast Air Quality Management District's (SCAQMD) letter of June 5, 2019. The purpose of the response is to provide clarification to the Planning Commission subsequent to the Initial Study being circulated for public review.

The SCAQMD's submitted a comment letter on the Initial Study/Mitigated Negative Declaration (IS/MND) prepared for the Riverside & Randall Gas Station Project proposed to be located at the southwest corner of Riverside Avenue and Randall Avenue. The comments in the SCAQMD letter have been numbered to make reviewing the responses to specific comments easier for the reviewer (see attached letter). The numbered comments are summarized below followed by a response to each.

Comment 1: Upon review of the Air Quality Analysis section and CalEEMod modeling output files, South Coast AQMD staff found that the land use types in CalEEMod are inconsistent with the Proposed Project's description. The Proposed Project's description states that the Proposed Project includes a gasoline service station with 10-fuel dispenser fueling stations and a 5,460-square-foot fuel canopy, a 7,250-square-foot convenience store with a drive-thru, a 1,750-square-foot automated carwash, and a 1,800-square-foot restaurant with a drive-thru. In CalEEMod, the Lead Agency quantified construction and operational emissions for the restaurant and the convenience market with 20 gas pumps, but did not quantify emissions for the 5,460-square-foot fuel canopy or the 7,250-square-foot convenience store with a drive-thru. These omissions may have led to an underestimation of the Proposed Project's construction and operational air quality impacts. Therefore, South Coast AQMD staff recommends that the Lead Agency clarify if the 5,460-square-foot fuel canopy and the 7,250-square-foot convenience store with a drive-thru were included in the CalEEMod modeling run. Alternatively, South Coast AQMD staff recommends that the Lead Agency

revise the Air Quality Analysis to quantify emissions from constructing and operating the fuel canopy and convenience store, and include these emissions for determining the level of significance for the Proposed Project's construction and operational air quality impacts in the Final MND.

Response 1: The Proposed Project includes a gasoline service station with a 10-fuel dispenser fueling station (20 pumps total, one on each side of each station) and a 5,460-square-foot fuel canopy (this is a roof over the proposed pumps, not an enclosed building), a 7,250-square-foot convenience store with a drive-thru (for prepared food pick-up), a 1,750-square-foot automated carwash, and a 1,800-square-foot restaurant with a drive-thru.

Using the CalEEMod model, the land uses selected were Convenience Market With Gas Pumps (20 Pumps were selected in lieu of using square-footage) and Fast Food Restaurant with a drive-thru (2,250 square feet). Each land use was selected to be consistent with the operational trips identified in the project's January 3, 2019 Traffic Impact Analysis (TIA). Refer to the attached TIA Project Trip Generation and the CalEEMod Trip Summary for additional information and to confirm consistency.

Comment 2: Upon a review of the Air Quality Analysis, it did not appear that the analysis included operational ROG emissions generated from storage tanks or from the fueling process during operation. This may have likely led to an underestimation 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%, respectively¹⁵, ROG emissions are not entirely eliminated from the fueling process and should be taken into consideration when analyzing the Proposed Project's operational air quality impacts. 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 CalEEMod¹⁶ 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.

Response 2: In the CalEEMod model, the land use for a Convenience Market with Gas Pumps was selected (20 Pumps). The cited emissions generated are in fact accounted for within the SCAQMD recommended CalEEMod model. In addition, a Health Risk Assessment (HRA) was prepared to address SCAQMD's request to prepare

focused HRAs for gasoline dispensing facilities. The analysis presented therein reflects a maximum annual throughput of approximately 3,500,000 gallons. This is preliminarily determined to be the approximate upper limit of gasoline throughput at which the respective fueling stations could operate while precluding potentially significant health risks. Ultimate fuel throughput allowances/requirements would be established by SCAQMD through the fueling station permitting processes noted below. No significant health risk impacts related to emissions were identified.

As indicated in the comment letter, the developer will be required to comply with the following rules/permits from SCAQMD prior to operational use. These include but are not limited to: Rule 461 – Gasoline Transfer and Dispensing, Rule 201 – Permit to Construct, Rule 203 – Permit to Operate, and Rule 1401 – New Source Review of Toxic Air Containments. Therefore, construction and operational impacts have been addressed in the CEQA document. The SCAQMD permitting process (as indicated) will further quantified emissions for purposes of approving/issuing permits.

Comment 3: In the event that, upon revisions to the Air Quality Analysis based on Comment Nos. 1 and 2, 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 website.

Mitigation Measures for Operational Air Quality Impacts from Mobile Sources

- Provide incentives for vendors and material delivery trucks that would be visiting the retail and restaurant operations 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.
- Provide electric vehicle (EV) charging stations for the retail 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 and restaurant 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 and restaurant 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.

Response 3: Comment noted. City will consider the referenced mitigation measures

Mr. Daniel Casey
June 5, 2019
Page 5

If you should have any questions or require additional information, please do not hesitate to give us a call.

Sincerely,

A handwritten signature in black ink, appearing to read 'Frank Amendola', with a long horizontal flourish extending to the right.

Frank Amendola
Project Manager

Table 3

Project Trip Generation

Land Use	Quantity	Units ¹	Source ²	Morning Peak Hour			Evening Peak Hour			Daily
				Inbound	Outbound	Total	Inbound	Outbound	Total	
<u>Trip Generation Rates</u>										
Fast-Food Restaurant With Drive Thru	1.000	TSF	ITE 934	20.50	19.69	40.19	16.99	15.68	32.67	470.95
Super Convenience Market/Service Station	1.000	VFP	ITE 960	14.04	14.04	28.08	11.48	11.48	22.96	230.52
<u>Trips Generated</u>										
Fast-Food Restaurant With Drive Thru	1.800	TSF	ITE 934	37	35	72	31	28	59	848
Fast-Food Restaurant With Drive Thru	0.450	TSF	ITE 934	9	9	18	8	7	15	212
Super Convenience Market/Service Station	20	VFP	ITE 960	281	281	562	230	229	459	4,610
Gross Trips Generated				327	325	652	269	264	533	5,670
<u>Trip Reductions</u>										
Internal Capture (5%) ³				-16	-16	-32	-13	-13	-26	-284
Subtotal With Internal Capture				311	309	620	256	251	507	5,386
Pass-By Trips (25%) ⁴				-78	-77	-155	-64	-63	-127	-1,347
Net New Project Trips Generated				233	232	465	192	188	380	4,039

¹ TSF = Thousand Square Feet; VFP = Vehicle Fueling Positions.

² ITE = Institute of Transportation Engineers, Trip Generation Manual, 10th Edition, 2017; ### = Land Use Code

³ Internal capture percentage is estimated based on procedures provided in Institute of Transportation Engineers, Trip Generation Handbook, 2nd Edition (see Attachment A).

⁴ Per City of Rialto guidelines, pass-by trip reduction not to exceed 25%.

Randall at Riverside Commercial Project - San Bernardino-South Coast County, Winter

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio-CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day															
Mitigated	5.4886	35.6719	35.6664	0.1074	5.8732	0.0806	5.9539	1.5717	0.0755	1.6472	11,033.866	11,033.866	11,033.866	1.1557		11,062.757
Unmitigated	5.4886	35.6719	35.6664	0.1074	5.8732	0.0806	5.9539	1.5717	0.0755	1.6472	11,033.866	11,033.866	11,033.866	1.1557		11,062.757
Total																

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated		Mitigated	
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT	Annual VMT	Annual VMT
Convenience Market With Gas Pumps	3,284.00	3,284.00	3,284.00	1,960,136		1,960,136	
Fast Food Restaurant with Drive Thru	754.99	754.99	754.99	794,539		794,539	
Total	4,038.99	4,038.99	4,038.99	2,754,676		2,754,676	

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diversed	Pass-by
Convenience Market With Gas	16.60	8.40	6.90	0.80	80.20	19.00	14	21	65
Fast Food Restaurant with Drive Thru	16.60	8.40	6.90	2.20	78.80	19.00	29	21	50

4.4 Fleet Mix