

SENT VIA E-MAIL AND USPS:

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**Mitigated Negative Declaration (MND) for the Proposed
Alder Plaza Project (Conditional Use Permit Nos. 810-812, Precise Plan of Design No. 2452,
Environmental Assessment Review NO. 16-26)**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comment is 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 develop a 4,100-square-foot commercial building, a 3,200-square-foot restaurant, and a diesel fuel station with a 1,262-square-foot canopy and four fuel dispensers on a 3.9-acre portion of 6.05 acres (Proposed Project). The Proposed Project site is partially developed with an existing gasoline station with eight gasoline dispensers and three diesel dispensers¹. "The nearest sensitive land uses are single-family homes, located over 0.5 mile away to the northeast and to the southwest of the Project site. No schools, hospitals or other sensitive uses are located within 0.5 mile of the Project²." Construction is expected to be completed within three months³.

Compliance with SCAQMD Rules

Since the Proposed Project includes the operation of a diesel fuel station in addition to the operation of an existing gasoline station, a permit or modification to an existing permit from SCAQMD would be required, and SCAQMD should be identified as a Responsible Agency for the Proposed Project in the Final MND. The assumptions in the air quality analysis in the Final MND will be the basis for permit conditions and limits. The Final MND should also demonstrate compliance with applicable SCAQMD Rules, including, but are not limited to, Rule 201 – Permit to Construct, Rule 203 – Permit to Operate, and Rule 461 – Gasoline Transfer and Dispensing. If there are permitting questions concerning the gasoline service station, they can be directed to SCAQMD Engineering and Permitting staff at (909) 396-2551.

Air Quality Analysis

In the Air Quality analysis, 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 CalEEMod⁴ 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

¹ MND. Page 7.

² *Ibid.* Page 19.

³ *Ibid.* Appendix C, *Air Quality and Greenhouse Gas Assessment*. CalEEMod Output. Page 6.

⁴ 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.

tanks and fueling equipment. Therefore, it is recommended that the Lead Agency use its best efforts to quantify and disclose operational emissions from the fueling process in the Final MND.

Closing

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 the 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 or useful to decision makers and to 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 if you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

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