

Appendix B

Notice of Preparation Comment Letters



February 1, 2024

Lupita Garcia, Associate Planner
City of Perris
Development Services Department
135 N. "D" Street
Perris, CA 92570

Subject: EMWD Comments for the Perris Ethanac Travel Center Project Notice of Preparation of a Draft Environmental Impact Report

Location: Northwest corner of Trumble and Ethanac Roads in the City of Perris, Riverside County, California.

Dear Ms. Lupita Garcia:

Eastern Municipal Water District (EMWD) thanks you for the opportunity to comment on the Perris Ethanac Travel Center Project Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR). The project involves the construction and operation of a travel center facility for regional and local highway traveling users. Implementation of the project would include the development of fueling facilities, travel amenities, a drive-through restaurant, parking facilities, fencing, and landscaping. The project would also include the installation of new on-site water lines and sewer lines that would connect with existing water and sewer infrastructure located in Trumble Road and Ethanac Road.

EMWD offers the following comments:

To define the impact(s) on the environment and on existing EMWD facilities, and as development within this area occurs over time, the proponents of implementing development projects shall consult EMWD's Development Services Department to compare proposed and existing water demands and sewer flows, and prepare a Design Conditions report (DC), formally known as the Plan of Service (POS), to detail all

Board of Directors

Philip E. Paule, *President* Stephen J. Corona, *Vice President* Jeff Armstrong Randy A. Record David J. Slawson

2270 Trumble Road • P.O. Box 8300 • Perris, CA 92572-8300

T 951.928.3777 • F 951.928.6177 www.emwd.org

pertinent facilities necessary to serve such implementing development projects, resulting in an approved DC, prior to final design and plan check of such facilities.

To help define EMWD's Design Conditions, EMWD requires beginning dialogue with project proponents at an early stage in the site design and development, via a one-hour complementary Due Diligence meeting. To set up this meeting the project proponent should complete a Project Questionnaire (form NBD-058) and submit to EMWD. To download this form or for additional information, please visit our web page www.emwd.org, then select the "Developer" link, then select the "New Development Process Forms" link. This meeting will offer the following benefits:

1. Describe EMWD's development process
2. Identify project scope and parameters
3. Provide a preliminary review of the project within the context of existing infrastructure
4. Discuss potential candidacy for recycled water service
5. Identify project submittal requirements to start the Design Conditions review

Following the Due Diligence meeting, and to proceed with a project, the Design Conditions will need to be developed by the developer's engineer and reviewed/approved by EMWD prior to submitting improvement plans for Plan Check. The DC process and approval will provide the following:

1. Technical evaluation of the project's demands and existing system capacities
2. Identification of impacts to existing facilities
3. Identification of additional on-site and off-site facilities, necessary to serve the project
4. Identification of easement requirements, if necessary
5. Identification of potential EMWD's cost participation in facility oversizing, if applicable

If you have questions or concerns, please do not hesitate to contact Maroun El-Hage at (951) 928-3777, extension 4468 or by e-mail at El-hagem@emwd.org.

Sincerely,

Anthony Budicin
Director of Environmental and Regulatory Compliance

ANB: hs

Attachments: Copy of Public Notice



RIVERSIDE COUNTY FLOOD CONTROL
AND WATER CONSERVATION DISTRICT

242235

February 4, 2022

City of Perris
Planning Department
135 North D Street
Perris, CA 92570

Attention: Lupita Garcia

Re: CUP 22-05002, CUP 22-05003
APNs 329-250-011 and -012

The Riverside County Flood Control and Water Conservation District (District) does not normally recommend conditions for land divisions or other land use cases in incorporated cities. The District also does not plan check City land use cases or provide State Division of Real Estate letters or other flood hazard reports for such cases. District comments/recommendations for such cases are normally limited to items of specific interest to the District including District Master Drainage Plan facilities, other regional flood control and drainage facilities which could be considered a logical component or extension of a master plan system, and District Area Drainage Plan fees (development mitigation fees). In addition, information of a general nature is provided.

The District's review is based on the above-referenced project transmittal, received February 1, 2022. The District **has not** reviewed the proposed project in detail, and the following comments do not in any way constitute or imply District approval or endorsement of the proposed project with respect to flood hazard, public health and safety, or any other such issue:

- ☐ This project would not be impacted by District Master Drainage Plan facilities, nor are other facilities of regional interest proposed.
- ☒ This project involves District proposed Master Drainage Plan facilities, namely, Romoland MDP Line A-11a. The District will accept ownership of such facilities on written request of the City. Facilities must be constructed to District standards, and District plan check and inspection will be required for District acceptance. Plan check, inspection, and administrative fees will be required.
- ☐ This project proposes channels, storm drains 36 inches or larger in diameter, or other facilities that could be considered regional in nature and/or a logical extension of the adopted Perris Valley Master Drainage Plan. The District would consider accepting ownership of such facilities on written request of the City. Facilities must be constructed to District standards, and District plan check and inspection will be required for District acceptance. Plan check, inspection, and administrative fees will be required.
- ☒ This project is located within the limits of the District's ☐Perris Valley ☐San Jacinto River ☒Homeland/Romoland Line A ☐Homeland/Romoland Line B Area Drainage Plan for which

drainage fees have been adopted. If the project is proposing to create additional impervious surface area, applicable fees should be paid by cashier's check, wire transfer or online payment only to the Flood Control District or City prior to issuance of grading or building permits. Fees to be paid should be at the rate in effect at the time of issuance of the actual permit.

☐ An encroachment permit shall be obtained for any construction related activities occurring within District right of way or facilities, namely, _____. For further information, contact the District's Encroachment Permit Section at 951.955.1266.

☐ The District's previous comments are still valid.

GENERAL INFORMATION

This project may require a National Pollutant Discharge Elimination System (NPDES) permit from the State Water Resources Control Board. Clearance for grading, recordation, or other final approval should not be given until the City has determined that the project has been granted a permit or is shown to be exempt.

If this project involves a Federal Emergency Management Agency (FEMA) mapped floodplain, then the City should require the applicant to provide all studies, calculations, plans, and other information required to meet FEMA requirements, and should further require the applicant obtain a Conditional Letter of Map Revision (CLOMR) prior to grading, recordation, or other final approval of the project and a Letter of Map Revision (LOMR) prior to occupancy.

If a natural watercourse or mapped floodplain is impacted by this project, the City should require the applicant to obtain a Section 1602 Agreement from the California Department of Fish and Wildlife and a Clean Water Act Section 404 Permit from the U.S. Army Corps of Engineers, or written correspondence from these agencies indicating the project is exempt from these requirements. A Clean Water Act Section 401 Water Quality Certification may be required from the local California Regional Water Quality Control Board prior to issuance of the Corps 404 permit.

Very truly yours,



DEBORAH DE CHAMBEAU
Engineering Project Manager

cc: Riverside County Planning Department
Attn: Phayvanh Nanthavongdouangsy

WMC:blm



RIVERSIDE COUNTY FLOOD CONTROL
AND WATER CONSERVATION DISTRICT

254844

February 8, 2024

City of Perris
Planning Department
135 North D Street
Perris, CA 92570

Attention: Lupita Garcia

Re: CUPs 22-05002, 22-05003 and Variance
24-05022, Perris Ethanac Travel Center
Project, APNs 329-250-011, 329-250-012

The Riverside County Flood Control and Water Conservation District (District) does not normally recommend conditions for land divisions or other land use cases in incorporated cities. The District also does not plan check City land use cases or provide State Division of Real Estate letters or other flood hazard reports for such cases. District comments/recommendations for such cases are normally limited to items of specific interest to the District including District Master Drainage Plan facilities, other regional flood control and drainage facilities which could be considered a logical component or extension of a master plan system, and District Area Drainage Plan fees (development mitigation fees). In addition, information of a general nature is provided.

The District's review is based on the above-referenced project transmittal, received January 26, 2024. The District **has not** reviewed the proposed project in detail, and the following comments do not in any way constitute or imply District approval or endorsement of the proposed project with respect to flood hazard, public health and safety, or any other such issue:

- ☐ This project would not be impacted by District Master Drainage Plan facilities, nor are other facilities of regional interest proposed.
- ☒ This project involves District proposed Master Drainage Plan facilities, namely, Romoland Master Drainage Plan Line A-11a. Currently, the downstream portion of Line A-11a is maintained by the City of Perris. For consistency, if the adjacent upstream portion of the line is to be constructed, it shall also be maintained by the City.
- ☐ This project proposes channels, storm drains larger than 36 inches in diameter, or other facilities that could be considered regional in nature and/or a logical extension a District's facility, the District would consider accepting ownership of such facilities on written request by the City. The Project Applicant shall enter into a cooperative agreement establishing the terms and conditions of inspection, operation, and maintenance with the District and any other maintenance partners. Facilities must be constructed to District standards, and District plan check and inspection will be required for District acceptance. Plan check, inspection, and administrative fees will be required. The regulatory permits' terms and conditions shall be approved by the District prior to improvement plan approval, map recordation, or finalization of the regulatory permits. There shall be no unreasonable constraint upon the District's ability to operate and maintain the flood control facility(ies) to protect public health and safety.
- ☒ This project is located within the limits of the District's ☐Perris Valley ☐San Jacinto River ☒Homeland/Romoland Line A ☐Homeland/Romoland Line B Area Drainage Plan for which drainage fees have been adopted. If the project is proposing to create additional impervious surface area, applicable fees should be paid (in accordance with the Rules and Regulations for Administration of Area Drainage Plans) to the Flood Control District or City prior to issuance of grading or building permits. Fees to be paid should be at the rate in effect at the time of issuance of the actual permit.

Re: CUPs 22-05002, 22-05003 and Variance
24-05022, Perris Ethanac Travel Center
Project, APNs 329-250-011, 329-250-012

254844

- ☐ An encroachment permit shall be obtained for any construction related activities occurring within District right of way or facilities, namely, _____. If a proposed storm drain connection exceeds the hydraulic performance of the existing drainage facilities, mitigation will be required. For further information, contact the District's Encroachment Permit Section at 951.955.1266.
- ☒ The District's previous comments dated February 4, 2022 have been updated herein.

GENERAL INFORMATION

This project may require a National Pollutant Discharge Elimination System (NPDES) permit from the State Water Resources Control Board. Clearance for grading, recordation, or other final approval should not be given until the City has determined that the project has been granted a permit or is shown to be exempt.

If this project involves a Federal Emergency Management Agency (FEMA) mapped floodplain, then the City should require the applicant to provide all studies, calculations, plans, and other information required to meet FEMA requirements, and should further require the applicant obtain a Conditional Letter of Map Revision (CLOMR) prior to grading, recordation, or other final approval of the project and a Letter of Map Revision (LOMR) prior to occupancy.

The project proponent shall bear the responsibility for complying with all applicable mitigation measures defined in the CEQA document (i.e., Negative Declaration, Mitigated Negative Declaration, Environmental Impact Report) and/or Mitigation Monitoring and Reporting Program, if a CEQA document was prepared for the project. The project proponent shall also bear the responsibility for complying with all other federal, state, and local environmental rules and regulations that may apply.

If a natural watercourse or mapped floodplain is impacted by this project, the City should require the applicant to obtain a Section 1602 Agreement from the California Department of Fish and Wildlife and a Clean Water Act Section 404 Permit from the U.S. Army Corps of Engineers, or written correspondence from these agencies indicating the project is exempt from these requirements. A Clean Water Act Section 401 Water Quality Certification may be required from the local California Regional Water Quality Control Board prior to issuance of the Corps 404 permit.

Very truly yours,



AMY MCNEILL
Engineering Project Manager

EM:blj

February 26, 2024

Lupita Garcia
Associate Planner
City of Perris, Development Services Department
135 North "D" Street
Perris, CA 92570-2200

RE: City of Perris Project – Notice of Preparation (NOP) and Public Scoping Meeting Notice for the preparation of a Draft Environmental Impact Report (DEIR) for the Perris Ethanac Travel Center Project – Conditional Use Permit (CUP) 22-05002, and Variance 24-05022 for a freeway sign

Dear Ms. Garcia,

Thank you for the opportunity to review the above proposal for the Perris Ethanac Travel Center located on approximately 14.4-acres at the northwest corner of Ethanac and Trumble Roads located adjacent to the City of Menifee and the I-215 Freeway. Menifee is aware that the project involves a 13,980 square-foot travel center building with a drive-thru restaurant, an 8,452 square-foot shop building for minor truck services, two fueling facilities (20-foot tall canopy to the north with 7 diesel fueling lanes/positions and a 19-foot tall canopy to the south with 8 gas islands with 16 fueling positions), 203 parking spaces (116 are truck spaces), two above-ground storage tank farms and a freeway sign which requires approval of a variance. The City of Menifee has reviewed the project and offers the following preliminary comments.

- The Notice of Preparation (NOP) and Environmental Initial Study (IS) determines that an Environmental Impact Report (EIR) is required for the project based on potential to cause significant environmental impacts. However, all environmental topics except for "Greenhouse Gas Emissions" were determined to result in less than significant environmental impacts and will not be further analyzed in the Draft Environmental Impact Report (DEIR). The City of Menifee is concerned that the project may have the potential for other significant impacts – see below.
- In the City of Menifee's March 7, 2022 comment letter to the City of Perris, Menifee expressed concerns related to aesthetic impacts and lack of details in the plans to fully understand visual impacts of the project, which is in a highly visible location adjacent to the City of Menifee in gateway areas of both the City of Menifee and City of Perris. The aesthetics discussion of the IS indicates that the Project would include two aboveground storage tank farms with 14-foot decorative block wall and pilasters and an 8-foot-tall split face block wall surrounding the majority of the Project site; however, it remains unclear where the decorative block walls will be constructed, what they are actually screening, and makes no mention of whether trucks in the proposed truck parking areas will be screened. A site plan is provided but it does not clearly depict the decorative walls discussed or show their location and height and no building or wall elevations are provided. Further detail is needed on the aboveground storage tank farms, including, size of the tank farms, how many tanks are proposed, size of tanks/capacity, and what is being stored in the tanks (diesel, gasoline, propane, or other?). The aesthetic analysis lacks

these details along with site photos, line of site analysis and visual simulations from various vantage points of public views.

In addition, a 65-foot pole sign/freeway sign proposed at the northwest corner of the site, requires a variance. A 65-foot-high sign for this use seems excessive and the discussion makes no mention of Perris's height standard, how much the standard will be exceeded, or any specifics on unique site conditions/constraints, such as a substantially lower grade than that of the adjacent freeway, or how much it may be lower. If the sign is at a lower grade than that of the freeway, is the requested increase in height above the standard, equivalent to the difference in grade? Finally, the aesthetics discussion makes no mention of the size of the sign face and no images are provided to illustrate the design of the sign, which is important particularly given its size and adjacency to the freeway. There is concern that the sign is described as a pole sign, which conjures images of a bare pole support with a can sign on top. For any freeway sign requiring a variance to be as tall as the proposed sign, such sign needs to be a high-quality pylon sign designed to be architecturally integrated and consistent with the building architecture of the proposed project. Given the lack of aesthetic analysis to support a less than significant determination, impacts related to aesthetics may be significant, and the DEIR needs to further analyze and mitigate any significant impacts related to aesthetics.

- The City of Menifee's Engineering Department has reviewed the traffic impacts analysis for any potential impacts to Menifee streets and has identified deficiencies which need to be addressed to appropriately analyze traffic impacts of the project to Menifee streets and identify improvements necessary to address and minimize those impacts. Please refer to attached February 23, 2024 City of Menifee Public Works/Engineering Department comments relating to the traffic analysis.
- Finally, please provide all future environmental notices/documents to the City of Menifee Planning Department for review once they become available.

We appreciate your consideration of these comments and thank you again for the opportunity to provide comments. We respectfully look forward to discussing these items further prior to the approval of this project. If you have questions, please contact me at 951-723-3744 or by e-mail at ddarnell@cityofmenifee.us

Sincerely,

Doug Darnell

Doug Darnell, AICP
Principal Planner

Cc: Cheryl Kitzerow, AICP Community Development Director, City of Menifee
Nick Fidler, Public Works and Engineering Director, City of Menifee
Orlando Hernandez, Deputy Community Development Director, City of Menifee
Alberto Paiva, Deputy Public Works Director/City Engineer, City of Menifee

Attachment: February 23, 2024 City of Menifee Public Works/Engineering Department Comments



CITY OF MENIFEE

MEMORANDUM

PUBLIC WORKS/ENGINEERING DEPARTMENT

DATE: February 23, 2024

TO: Doug Darnell, AICP, Principal Planner

FROM: Haile Ford, PE, Senior Engineer

CC: Steven Strapac, PE, PLS, QSD, Assistant City Engineer

RE: City of Perris' Ethanac Travel Center – CUP 22-05002 – PC2 Engineering Comments

The PC2 comments noted herein are for review of the following:

- Ethanac Travel Center Project Initial Study, prepared by De Novo Planning Group, dated January 2024 – Section 4.10: Hydrology and Water Quality, and Section 4.17: Transportation

Public Works / Engineering has reviewed the referenced documents and has the following comments:

Section 4.10: Hydrology and Water Quality:

1. Based on the information presented in this section, all drainage drains to the northwest and west, away from the City of Meniffee. Therefore, Engineering has no further comments on this submittal.

Section 4.17: Transportation (Transportation Analysis dated October 2022):

1. Of the seven locations that were analyzed, the intersection of Ethanac Road and Sherman Road was not analyzed. This location was requested to be analyzed in the City's comments dated March 7, 2022. Please explain why this location was not analyzed.
2. One of the recommended improvements is to add a second eastbound through lane at the intersection of Ethanac Road and Trumble Road. Regarding this intersection, please note the following comments:
 - a. Adding a second eastbound through lane at this intersection would encroach into the City of Meniffee's jurisdiction. Please coordinate in advance with the City of Meniffee regarding this recommended improvement.
 - b. Provide an exhibit that shows the proposed widening and improvements at this intersection.

- c. The south driveway on Trumble Road may be too close to this intersection.
 - d. The curb and gutter on Trumble Road north of Ethanac Road should line up with the frontage improvements on Trumble Road south of Ethanac Road.
3. In the Drive-Through Queuing Analysis section, please clarify if this analysis was performed for the project only or if it also considered the “Cumulative Plus Project” condition.

General Comments:

1. The following projects in the City of Menifee's jurisdiction are also in the immediate vicinity of this project:
- The Core 5 industrial warehouse project (City of Menifee Planning Case No. PLN23-0171).
 - The Trumble / Watson industrial warehouse project (City of Menifee Planning Case No. DEV2022-019).

Coordinate in advance with the City of Menifee regarding these projects, to ensure that the recommendations in the Transportation Analysis do not conflict with the traffic recommendations for these City of Menifee projects.

As you coordinate with the City of Menifee, keep in mind the following City of Menifee Level of Service (LOS) Guidelines:

- The traffic study / analysis area, at a minimum, shall generally include streets on which the proposed project will add 50 or more peak-hour trips, up to a 5-mile radius from the project location. The limits of this area may be extended if the project has a regional impact on the regional transportation system.
- Additional intersections of concern, which may include but not be limited to project driveways, may also require analysis.
- For projects located in the vicinity of schools, traffic counts may be required during the school season as determined by the Community Development Department or Public Works / Engineering Department.
 - A Roadway Segment Analysis shall be required for roadway segments where 500 or more daily trips are added along the City of Menifee's Circulation Element roadway network, up to a 5-mile radius from the project location.

- Additional intersections and roadway segments may be required to be analyzed at the discretion of the City of Menifee's Traffic Engineer.
- The City of Menifee has identified LOS D as the standard for acceptable operating conditions for intersections, except at constrained intersections and roadway segments in close proximity to I-215, where LOS E is acceptable during peak hours.
- The traffic study / analysis shall address whether or not the required LOS will be achieved after the proposed project is constructed. Intersections or roadway segments not meeting the required LOS may be conditioned for improvements toward meeting the LOS standard. Specifically, a project would not meet the LOS standard if: (1) The pre-project condition at an intersection or roadway segment is at or better than the minimum acceptable LOS, and the addition of project trips results in an unacceptable LOS. (2) The pre-project condition is at LOS E or F, and the project adds 50 or more peak-hour trips to the intersection or roadway segment. This type of impact would be considered a "cumulative" project impact, in which the project would be required to contribute a fair-share payment toward reducing the impact.
- Fair-share contributions may be recommended to improve LOS conditions under the "Existing Plus Project" scenario if the existing condition is at an unacceptable LOS. All fair-share contributions shall be calculated using the following equation:

$$d = \frac{c}{(b - a)}$$

Where:

a = Existing Traffic Volume

b = Opening Year Cumulative With Project Volume

c = Proposed Project Trips

d = Fair Share Percentage

2. The applicant / developer and the City of Perris should coordinate with Caltrans for the necessary right-of-way required for future interchange widening and improvements.
3. The applicant / developer should provide appropriate right-of-way dedication for the ultimate improvements along Ethanac Road. It should be noted that Ethanac Road is designated as a 6 to 8-Lane Divided Expressway in the Circulation Element of the City of Menifee's General Plan.
4. Check the Caltrans Highway Design Manual for appropriate distances. In the City's previous review, the proposed driveway facing Ethanac Road appeared to be too close to the I-215 northbound on-ramp.

5. In the City's previous review, it was the City's belief that the proposed driveway facing Ethanac Road might align with Encanto Road. It was also the City's belief that the City of Perris had plans to close Encanto Road at this location, due to the proximity of the interchange.
6. Provide an exhibit that shows proposed improvements on the south side of Ethanac Road.
7. Clarify whether there will be a curbed median on Ethanac Road from I-215 to Trumble Road. As noted in General Comment No. 3 above, Ethanac Road is designed as a 6 to 8-Lane Divided Expressway in the Circulation Element of the City of Menifee's General Plan.

The applicant / developer is advised to prepare a response letter in the next submittal, responding back to each comment in this Memo. Any questions can be directed to Haile Ford at (951) 723-1774 (office), (213) 215-6772 (cell), or by email at hford@cityofmenifee.us.



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:

February 26, 2024

lgarcia@cityofperris.org

Lupita Garcia, Associate Planner
City of Perris
135 North "D" Street
Perris, CA 92570

Notice of Preparation of a Draft Environmental Impact Report for the Perris Ethanac Travel Center Project (Proposed Project)

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to comment on the above-mentioned document. Our comments are recommendations on the analysis of potential air quality impacts from the Proposed Project that should be included in the Draft Environmental Impact Report (EIR). Please send a copy of the Draft EIR upon its completion and public release directly to South Coast AQMD as copies of the Draft EIR submitted to the State Clearinghouse are not forwarded. **In addition, please send all appendices and technical documents related to the air quality, health risk, and greenhouse gas analyses (electronic versions of all emission calculation spreadsheets, air quality modeling, and health risk assessment input and output files, not PDF files). Any delays in providing all supporting documentation for our review will require additional review time beyond the end of the comment period.**

Responsible Agency and South Coast AQMD Permits

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.

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 <http://www.aqmd.gov/home/permits>.

CEQA Air Quality Analysis

Staff recommends that the Lead Agency use South Coast AQMD's CEQA Air Quality Handbook and website¹ as guidance when preparing the air quality and greenhouse gas analyses. It is also recommended that the Lead Agency use the CalEEMod² land use emissions software, which can estimate pollutant emissions from typical land use development and is the only software model maintained by the California Air Pollution Control Officers Association.

South Coast AQMD has developed both regional and localized significance thresholds. South Coast AQMD staff recommends that the Lead Agency quantify criteria pollutant emissions and compare the emissions to South Coast AQMD's CEQA regional pollutant emissions significance thresholds³ and localized significance thresholds (LSTs)⁴ to determine the Proposed Project's air quality impacts. The localized analysis can be conducted by either using the LST screening tables or performing dispersion modeling.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips, and hauling trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers and air pollution control devices), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, emissions from the overlapping construction and operational activities should be combined and compared to South Coast AQMD's regional air quality CEQA *operational* thresholds to determine the level of significance.

The Proposed Project would include, among other things, a diesel and gasoline service station with 16 pumps. Benzene, which is one of the toxic air contaminants, may be emitted from the operation. To ensure that sensitive receptors are not going to be adversely affected by the exposure to benzene, it is recommended that the Lead Agency evaluate, quantify, and perform a health risk assessment for the Proposed Project in the Draft EIR⁵.

Mitigation Measures

In the event that the Proposed Project results in significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize these impacts. Any impacts resulting from mitigation measures must also be analyzed. Several resources to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project include South Coast AQMD's CEQA Air Quality Handbook,⁶ South Coast AQMD's Mitigation Monitoring and

¹ South Coast AQMD's CEQA Handbook and other resources for preparing air quality analyses can be found at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>.

² CalEEMod is available free of charge at: www.caleemod.com.

³ South Coast AQMD's CEQA regional pollutant emissions significance thresholds can be found at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>.

⁴ South Coast AQMD's guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

⁵ South Coast AQMD. Guidance for performing a gasoline dispensing station health risk assessment can be found here: <http://www.aqmd.gov/home/permits/risk-assessment>.

⁶ <https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>

Reporting Plan for the 2022 Air Quality Management Plan,⁷ and Southern California Association of Government's Mitigation Monitoring and Reporting Plan for the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy.⁸

South Coast AQMD staff is available to work with the Lead Agency to ensure that air quality, greenhouse gas, and health risk impacts from the Proposed Project are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at swangl@aqmd.gov.

Sincerely,

Sam Wang

Sam Wang
Program Supervisor, CEQA IGR
Planning, Rule Development & Implementation

SW
RVC240201-03
Control Number

⁷ South Coast AQMD's 2022 Air Quality Management Plan can be found at: <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan> (Chapter 4 - Control Strategy and Implementation).

⁸ Southern California Association of Governments' 2020-2045 RTP/SCS can be found at: https://www.connectsoal.org/Documents/PEIR/certified/Exhibit-A_ConnectSoCal_PEIR.pdf.

