



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Mitigated Negative Declaration (MND) for the Proposed Merrill Gardens Assisted Living and Memory Care Facility

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 demolish an existing commercial building and construct a 121,061 square-foot assisted living and care facility on 29,077 square feet ("Proposed Project"). The Proposed Project is surrounded by commercial development and public facilities. Based on a review of aerial photographs, the Proposed Project would be approximately 100 feet from a gasoline dispensing station. Construction is expected to begin in 2017 and be completed within sixteen months.

Health Risk Assessment due to the Proposed Project's Proximity to a Gasoline Dispensing Station

Based on the project description, future residents at the Proposed Project would be exposed to toxic emissions from the gasoline dispensing station. Therefore, SCAQMD staff recommends that the Lead Agency conduct a Health Risk Assessment (HRA) to disclose the potential health risks to the people who will live and work at the Proposed Project. Guidance for performing a gasoline dispensing station HRA ("*Emission Inventory and Risk Assessment Guidelines for Gasoline Dispensing Stations*") can be found at: http://www.aqmd.gov/docs/default-source/planning/risk-assessment/gas_station_hra.pdf.

Guidance on Siting Sensitive Receptors Near Sources of Air Pollution

SCAQMD staff recognizes that there are many factors Lead Agencies must consider when making local planning and land use decisions. To facilitate stronger collaboration between Lead Agencies and SCAQMD to reduce community exposure to source-specific and cumulative air pollution impacts, SCAQMD adopted the *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*¹ in 2005. Additionally, the California Air Resources Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective*² recommends avoiding siting residences within 300 feet of a large gas station or 50 feet for a typical gas station. These Guidance documents provide recommended policies that local governments can use in their General Plans or through local planning to prevent or reduce potential air pollution impacts and protect public health. SCAQMD staff recommends that the Lead Agency review and consider these Guidance documents when making local planning and land use decisions.

¹ South Coast Air Quality Management District. May 2005. "*Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*." Accessed at: <http://www.aqmd.gov/home/library/documents-support-material/planning-guidance/guidance-document>.

² California Air Resources Board. April 2005. "*Air Quality and Land Use Handbook: A Community Health Perspective*." Accessed at: <http://www.arb.ca.gov/ch/landuse.htm>.

Compliance with SCAQMD Rule 1403

Since the Proposed Project includes demolition, asbestos may be encountered. Therefore, the Lead Agency should include a discussion to demonstrate compliance with SCAQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities in the Final MND.

Pursuant to the 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. 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 Ryan Bañuelos, Air Quality Specialist, CEQA Section, at (909) 396-3479, if you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS/JC:RB

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