



South Coast Air Quality Management District

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

SENT VIA E-MAIL AND USPS:

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khart@ci.stanton.ca.us

Kelly Hart, Community Development Director
City of Stanton, Community Development Department
7800 Katella Avenue
Stanton, CA 90680

Mitigated Negative Declaration (MND) for the Village Center Project

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 155,296 square feet of commercial uses and construct 237 condominium units (up to 281,368 square feet), redevelop 42,300 square feet of commercial uses, and reuse 62,700 square feet of commercial uses on 21.87 acres (Proposed Project). The Proposed Project is generally bounded by commercial uses to the north, Beach Boulevard to the east, commercial development to the south, and residential uses to the west. Based on a review of aerial photographs, SCAQMD staff found that the Proposed Project would be located less than 230 feet from a gasoline dispensing station. Construction for the commercial phase is expected to begin in February 2018 and last until September 2018. The construction period for the residential phase is not currently available.

SCAQMD Staff's Summary of Air Quality Analysis

In the Air Quality Section, the Lead Agency quantified the construction and operational emissions and compared them to SCAQMD's regional and localized air quality CEQA significance thresholds to determine the significance of air quality impacts. The Lead Agency found that during the construction phase, construction activities would produce NO_x emissions that would exceed SCAQMD's localized air quality CEQA significance thresholds. However, after incorporation of mitigation measure (MM) AQ-2, NO_x emissions would be reduced to less than significant.

SCAQMD Staff's Comments

SCAQMD staff has comments about MM AQ-2, potential health impacts due to proximity to a gasoline dispensing station, and guidance on siting sensitive receptors near sources of air pollution. Comments are provided as follows.

1. Recommended Changes to the Existing Mitigation Measure (MM) AQ-2

CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant impacts. To further reduce the significant NO_x emissions during the construction phase, SCAQMD staff recommends the following change to MM AQ-2 that the Lead Agency should include in the Final MND. For more information on potential mitigation measures as guidance to the Lead Agency, please visit SCAQMD's CEQA Air Quality Handbook website at <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

MM AQ-2: The construction contractor(s) shall use construction equipment fitted with Tier 34 engines for all construction equipment of 50 horsepower or greater. The construction contractor shall maintain a list of all operating equipment in use on the project site for verification by the City of Stanton Building Division official or his/her designee. The construction equipment list shall state the makes, models, and number of construction equipment on-site. Equipment shall be properly serviced and maintained in accordance with manufacturer recommendations.

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

Based on the project description, the Proposed Project would be sited less than 230 feet from the gasoline dispensing station, and people living and working at the Proposed Project will likely have a high chance to be exposed to toxic emissions from the station. Therefore, SCAQMD staff recommends that the Lead Agency conduct a Health Risk Assessment (HRA) to disclose the potential health risks in the Final MND. 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.

3. *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 in 2005. Additionally, the California Air Resources Board's (CARB) Air Quality and Land Use Handbook: A Community Health Perspective 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. Since the Proposed Project includes residential uses, which may likely be sited near the gasoline dispensing station, SCAQMD staff recommends that the Lead Agency review and consider these Guidance documents when making local planning and land use decisions.

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. 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, 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:RB

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