



# South Coast Air Quality Management District

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SENT VIA E-MAIL:

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## **Mitigated Negative Declaration (MND) for the Proposed Pilot Travel Center Project (PEN21-0077) (Proposed Project)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The City of Moreno Valley is the Lead Agency under the California Environmental Quality Act (CEQA) for the Proposed Project. The following comments include information on South Coast AQMD's permits that the Lead Agency should consider in the Final MND.

In the MND, the Lead Agency proposes to construct and operate a 14,087-square-foot travel center and a fueling service station with 16 gasoline pumps and nine diesel pumps on 17.28 acres (Proposed Project). The MND calculated the residential cancer risk based on a 70-year exposure and the workplace cancer risk based on a 40-year exposure. The South Coast AQMD's CEQA significance threshold of 10 in a million for cancer risk is based on a 30-year exposure duration for sensitive receptors and a 25-year exposure duration for off-site workers. Since the Lead Agency compared the Proposed Project's cancer risk to the South Coast AQMD's CEQA significance threshold of 10 in a million to determine the level of significance for the Proposed Project's health risk impacts, the Lead Agency should use a 30-year exposure period for sensitive receptors (residents) and a 25-year exposure period for off-site workers to re-calculate the Proposed Project's health risks in the Final MND.

Since implementation of the gasoline service portion of the Proposed Project requires permits from South Coast AQMD, the Lead Agency should identify South Coast AQMD as the CEQA Responsible Agency for the Proposed Project in the Final MND (CEQA Guidelines Section 15381). Any assumptions used in the Final MND will be used as the basis for permit conditions and limits for the Proposed Project. The 2015 revised Office of Environmental Health Hazard Assessment (OEHHA) methodology is being used by South Coast AQMD for determining operational health risks for permitting applications and also for all CEQA projects where South Coast AQMD is the Lead Agency. Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions on permits. For more general information on permits, please visit South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>.

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 South Coast AQMD with written responses to all

comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, responses 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, informative, or useful to decision makers and the public who are interested in the Proposed Project.

South Coast AQMD 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](mailto:lsun@aqmd.gov) if you have questions or wish to discuss the comments.

Sincerely,

*Lijin Sun*

Lijin Sun.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

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