



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 Five Star Foods Project

South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are 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 approximately 13,000-square-foot industrial building and construct a 58,130-square-foot warehouse, including approximately 32,037 square feet¹ of manufacturing on 2.76 acres (Proposed Project). The Proposed Project is located at 10234 4th Street on the northwest corner of Center Avenue and 4th Street. Construction of the Proposed Project is expected to occur over approximately nine months and become operational in 2019².

SCAQMD Staff's Summary of Air Quality Analysis

In the Air Quality, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared those emissions to SCAQMD's recommended regional and localized air quality CEQA significance thresholds. Based on the analysis, the Lead Agency found that the Proposed Project's construction and operational emissions would not exceed SCAQMD's regional or localized air quality CEQA significance thresholds.

SCAQMD Permits and Consultation

The Proposed Project, among others, would include 32,037 square feet of manufacturing. It is recommended that the Lead Agency consult with SCAQMD's Engineering and Permitting staff to determine if operation of any of the proposed manufacturing equipment or associated activities would require a permit from SCAQMD or if any equipment would need to be registered under the Portable Equipment Registration Program (PERP) through the California Air Resources Board (CARB)³. If a permit from SCAQMD is required, SCAQMD should be identified as a Responsible Agency for the Proposed Project in the Final MND. Any assumptions used in the Air Quality Analysis in the adopted Final MND will be used as the basis for permit conditions and limits for the Proposed Project. Should there be any questions on permits, please contact SCAQMD's Engineering and Permitting staff at (909) 396-3385. For more general information on permits, please visit SCAQMD's webpage at: <http://www.aqmd.gov/home/permits>. For more information on the PERP Program, please contact CARB at (916) 324-5869 or visit CARB's webpage at: <https://ww2.arb.ca.gov/our-work/programs/portable-equipment-registration-program-perp>.

¹ MND. *Air Quality, Global Climate Change, and Health Risk Assessment Impact Analyses*, Page 7.

² Ibid. Page 89.

³ South Coast Air Quality Management District. *Portable Equipment Registration Program (PERP)*. Accessed at: <http://www.aqmd.gov/home/permits/equipment-registration/perp>.

Conclusion

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 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, informative, or useful to decision makers and 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 Robert Dalbeck, Assistant Air Quality Specialist, at RDalbeck@aqmd.gov or (909) 396-2139, should you have any questions.

Sincerely,

Lijin Sun

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