



South Coast Air Quality Management District

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July 29, 2015

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Draft Mitigated Negative Declaration (Draft MND) for the Proposed Mine and Reclamation Plan (CUP 93-02, Mod #2) Modification

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned Draft MND. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final MND document. Based on the project description, the proposed Modification #2 would incorporate 64-acres to an existing approved 114-acre mining area. The proposed modification would remove a previously operated aggregate plant and ready mix operation and allow mining of available aggregate resources.

SCAQMD staff has concerns that the Draft MND does not properly identify baseline estimates for existing operational emissions in the Draft MND. Table AQ4 – Station Source Emissions from Aggregate Processing & Ready Mix Plants – does not specify baseline operating conditions or assumptions used to develop the baseline emissions. Furthermore, based on review of historical SCAQMD Inspection Reports, the aggregate processing and ready mix plants have not been in operation since 2012. Therefore, the CEQA baseline for this project should be zero and no credit should be given for existing baseline emissions. SCAQMD staff recommends revising the air quality analysis to remove the CEQA baseline emissions or provide additional information to support the existing baseline emissions used in the analysis.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD staff with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. The SCAQMD staff is available to work with the Lead Agency to address these issues and any other air quality questions that may arise. Please contact Jack Cheng, Air Quality Specialist – CEQA Section, at (909) 396-2448, if you have any questions regarding these comments.

Sincerely,

Jillian Wong

Jillian Wong, Ph.D.

Program Supervisor

Planning, Rule Development & Area Sources

JW:JC

SBC150626-01

Control Number