



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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**Public Review Initial Study/Mitigated Negative Declaration (IS/MND) for the Proposed
444 North Nash Street Data Center Project (Proposed Project)
(State Clearinghouse No. 2022110041)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The City of El Segundo is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. The following comments include reviewing the requirements in CEQA Statute & Guidelines, recommended revisions to the CEQA regional and localized operation air quality impacts analysis, air quality mitigation measures, and information about South Coast AQMD rules and permits that the Lead Agency should incorporate in the Revised or Final IS/MND.

South Coast AQMD Staff's Summary of Project Information in the IS/MND

Based on the IS/MND, the Lead Agency proposes to install up to seven additional emergency backup diesel generators on a 0.5-acre portion of an approximately 6.14-acre property,¹ which results in a total of 15 backup diesel generators.² The Proposed Project would have four backup generators installed on platforms on top of existing generators, and three other backup generators would be built on concrete foundations.³ The Proposed Project is located at 444 North Nash Street, El Segundo.⁴ Based on a review of aerial photographs, South Coast AQMD staff found that the nearest sensitive receptor (e.g., Da Vinci School) is approximately 1,300 feet south-southeast of the Proposed Project. Construction of the Proposed Project is anticipated to last approximately two months, beginning in mid-2022 and ending in late 2022.⁵

South Coast AQMD Staff's Comments

Recommend reviewing the requirements in CEQA Statute & Guidelines, providing background information on the facility, and making determinations on the type of appropriate CEQA document, baseline, and scope to be used for the Proposed Project

¹ IS/MND. Page 7.

² *Ibid.* Page 14.

³ *Ibid.*

⁴ *Ibid.* Page 7.

⁵ *Ibid.* Page 21.

Pursuant to State CEQA Guidelines Article 4 and Article 5, the environmental setting, scope, and baseline of IS/MND prepared and conducted by the Lead Agency for the Proposed Project amend Environmental Assessment No. EA-971 should be consistent with the original IS/MND (2012 discretionary City approval for the existing data center and up to 14 emergency backup diesel generators). However, it appears the IS/MND uses only the northeast portion of the property and includes the seven additional emergency generators when defining the scope and baseline of the Proposed Project for the environmental impact assessment. In addition, South Coast AQMD is the responsible agency for the permitted and proposed emergency engines. However, the background information of the facility (e.g., South Coast AQMD's facility ID and permit numbers of those permitted equipment) is not provided. The original IS/MND is also not available on the website to verify facility design information, including the permit conditions and the technical specifications for the emergency engine equipment. It is unclear what basis was used to evaluate the environmental impacts in the original IS/MND. It is recommended that the Lead Agency review the requirement in CEQA Statute & Guidelines, providing background information on the facility, and making determinations on the type of appropriate CEQA document, baseline, and scope to be used for the Proposed Project.

Recommend Revisions to the CEQA Regional Operation Air Quality Impacts Analysis

Regional Operational Emissions Analysis

In the IS/MND, the Lead Agency discusses and concludes that the Proposed Project's unmitigated operational emissions would exceed the South Coast AQMD CEQA regional air quality significance thresholds for NOx emissions.⁶ Due to the NOx emissions exceedance, the Lead Agency proposes Mitigation Measures (MM) AQ-1 to limit the generator maintenance, staff training, and testing on any single day to no more than 110 minutes for the entire facility of up to 15 generators.⁷ Hence, the Proposed Project's mitigated operational emissions are reduced and less than the South Coast AQMD CEQA regional air quality significance thresholds.⁸ Table 4.3-5: Operational Emissions (Maximum pounds per day) in the IS/MND show unmitigated and mitigated operation emissions, with the emissions calculated using California Emissions Estimator Model (CalEEMod).⁹ However, the operational emissions from CalEEMod output files¹⁰ and the emissions calculations spreadsheet in Appendix D¹¹ do not match the values presented in the IS/MND. For instance, the IS/MND shows the NOx emissions as 412.89 lbs/day (unmitigated) and 25.19 lbs/day (mitigated),¹² but the CalEEMod output files and the emissions calculations spreadsheet in Appendix D show different values. Therefore, South Coast AQMD staff is not able to verify any of the unmitigated and mitigated operational emissions in the IS/MND and its appendices. South Coast AQMD staff recommends that the Lead Agency provide a more detailed explanation of how the operational emissions are calculated with supporting evidence and include them in the Revised or Final IS/MND. Alternatively, if the explanation is not provided in the Revised or Final IS/MND to verify the emissions values, the Lead Agency should review and

⁶ *Ibid.* Page 39.

⁷ *Ibid.* Page 47.

⁸ *Ibid.* Page 39.

⁹ *Ibid.* Page 40.

¹⁰ Appendix A. CalEEMod Output Files.

¹¹ Appendix D. Page 12 of PDF.

¹² IS/MND. Page 40.

revise both IS/MND, CalEEMod output files, and the emissions calculations spreadsheet to ensure that all documents present the emissions consistently to avoid any discrepancies and include the revisions in the Revised or Final IS/MND. If the revisions are not included in the Revised or Final IS/MND, the Lead Agency should provide reasons for not having it supported by substantial evidence in the record.

In addition, the Lead Agency discusses that with the proposed MM AQ-1, the mitigated operation emissions are less than South Coast AQMD CEQA Regional Operational Air Quality Significance Thresholds.¹³ South Coast AQMD staff is not able to verify and replicate the mitigated operation emissions that the Lead Agency includes in the IS/MND due to the lack of supporting evidence. Based on the emissions calculations spreadsheet in Appendix D, the Caterpillar 3516C, rated at 3,643 horsepower (hp), has the highest NOx emission factors out of 15 generators. Therefore, South Coast AQMD staff uses this generator model's emissions factor to re-calculate the mitigated operation emissions by using the proposed limit of 110 minutes as the maximum operating time for more conservative results and finds that the mitigated NOx emission is 55.67 lbs/day, which slightly exceeds the South Coast AQMD CEQA Regional Operational Air Quality Significance Thresholds for NOx. It is recommended that the Lead Agency review the definitions of CEQA Environmental Setting for the project baseline (per CEQA Guidelines Section 15125) for the Proposed Project, determine which emission source would be included and result in an emissions increase, and revise the emission calculations with the most accurate and conservative results and include them in the Revised or Final IS/MND. If the mitigated operational NOx emissions are found to be exceeded the significance thresholds, the Lead Agency should propose and discuss other additional air quality mitigation measures to further reduce the emissions, re-calculate operation emissions with the implementation of new mitigation measures, and include them in the Revised or Final IS/MND. If the revision and/or new air quality mitigation measures are not included in the Revised or Final IS/MND, the Lead Agency should provide reasons for not having it supported by substantial evidence in the record.

Localized Operational Emissions Analysis

In the IS/MND, the Lead Agency discusses the localized construction and operation emissions and shows in Table 4.3-6: Significance of Localized Emissions.¹⁴ The localized emissions are calculated using the Mass Rate LST Lookup Table in the IS/MND.¹⁵ However, based on the aerial maps, the Proposed Project is surrounded by two-stories buildings. Therefore, South Coast AQMD staff suggests the Lead Agency re-evaluate the localized operational emissions by conducting dispersion modeling to include building downwash in order to predict more accurate and conservative results, determine the significance levels, and include the revised localized operation emissions in the Revised or Final IS/MND. If the revision is not included in the Revised or Final IS/MND, the Lead Agency should provide reasons for not having it supported by substantial evidence in the record.

¹³ *Ibid.* Page 47.

¹⁴ *Ibid.* Page 42.

¹⁵ South Coast AQMD LST Mass Rate Lookup Table can be found at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

Recommend Revisions to the Air Quality Mitigation Measures

In the IS/MND, the Lead Agency proposes Mitigation Measure MM AQ-1 as “Generator maintenance, staff training, and testing shall be limited on any single day to no more than 110 minutes for the entire facility (up to 15 generators).¹⁶ However, if this statement is one of the permit conditions for the generators, the Lead Agency should not claim it as a mitigation measure since the Lead Agency needs to have those generators in compliance pursuant to the permit conditions. Additionally, as mentioned in the first comment, if the mitigated operation NOx emissions exceed the South Coast AQMD CEQA Regional Operational Air Quality Significance Thresholds, other additional mitigation measures should be considered and discussed in the Revised or Final IS/MND to further reduce the NOx emissions to be below the significance thresholds. Therefore, South Coast AQMD staff recommends that the Lead Agency proposes and discusses other additional mitigation measures to further reduce the operational emissions of the Proposed Project and includes them in the Revised or Final IS/MND. If the revision is not included in the Revised or Final IS/MND, the Lead Agency should provide reasons for not having it supported by substantial evidence in the record.

Responsible Agency and South Coast AQMD Permits

In the event that the Proposed Project or implementation of the Proposed Project requires modifying the existing or the use of new stationary equipment, permits from South Coast AQMD are required unless a written permit is not required.¹⁷ The Lead Agency should use good-faith effort to include a discussion of equipment that will require South Coast AQMD permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project in the Revised or Final IS/MND. If any activities involve using equipment that either emits or controls air pollution, the Lead Agency should consult with South Coast AQMD staff to determine whether or not permits or plans are required and approved by South Coast AQMD prior to the construction and operation. The Lead Agency should determine which South Coast AQMD Rules apply to the Proposed Projects’ equipment, such as Rule 431.2 – Sulfur Content of Liquid Fuels¹⁸ and Rule 1110.2 – Emissions from Gaseous and Liquid-Fueled Engines,¹⁹ will be applicable and discussed in the Revised or Final IS/MND. Please contact South Coast AQMD’s Engineering and Permitting staff at (909) 396-3385 or visit South Coast AQMD’s web page for more general information on permits: <http://www.aqmd.gov/home/permits>.

Conclusion

According to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the IS/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 Revised or Final IS/MND. When the Lead Agency’s position is at variance with recommendations raised in the comments, the issues raised in the comments should be addressed in detail, giving reasons why specific comments and suggestions

¹⁶ IS/MND. Page 47.

¹⁷ South Coast AQMD. Rule 219. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/Rule-219.pdf>.

¹⁸ South Coast AQMD. Rule 431.2 – Sulfur Content of Liquid Fuels. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-431-2.pdf>.

¹⁹ South Coast AQMD. Rule 1110.2 – Emissions from Gaseous- and Liquid-Fueled Engines. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1110-2.pdf>.

are not accepted. There should be good faith and 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 Danica Nguyen, Air Quality Specialist, at dnguyen1@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

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Planning, Rule Development, and Implementation

SW:DN

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