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Draft Environmental Impact Report (DEIR) for the Coachella Airport Business Park Project (Proposed Project) (SCH No: 2023040106)

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to review the above-mentioned document. The City of Coachella is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff has provided a brief summary of the project information and prepared the following comments which are organized by topic of concern.

Summary of Proposed Project Information in the DEIR

Based on the DEIR, the Proposed Project would include the development of a currently vacant and undeveloped approximate 47.96 acres in the southeastern portion of the city of Coachella.[1] The overall Proposed Project site would be developed for approximately 42.36 acres of industrial uses while an Imperial Irrigation District (IID) substation would be located at the northern 5.6 acres of the Project site. The key components of the Project are summarized below:[2]

- **Fuel Station and Retail:** Ten fueling position gas station with an associated convenience store, located at the site's entrance along Airport Boulevard. The gas station is anticipated to have a maximum throughput of 2.0 million gallons of gasoline per year.[3]
- **Small Business Buildings:** Eighteen buildings, each approximately 4,500 square feet (totaling about 81,000 square feet).[4]
- **Personal Vehicle Storage:** Four structures averaging 19,200 square feet each (totaling approximately 76,800 square feet).[5]
- **Self-Storage Buildings:** Seventeen buildings ranging from 5,200 to 10,400 square feet (totaling approximately 128,600 square feet).[6]
- **Warehouses:** Five small warehouses ranging from 9,600 to 24,000 square feet (approximately 96,000 square feet total). Six large warehouses ranging from 22,400 to

[1] DEIR, page ES-1.
[2] *Ibid.*
[3] DEIR, page 4.3-26.
[4] DEIR, page 2.0-4.
[5] *Ibid.*
[6] *Ibid.*

48,800 square feet (approximately 233,100 square feet total) would be developed along the northern portion of the site near the proposed substation.[7]

- **IID Electrical Substation:** A 315-foot by 315-foot IID substation which would require at least one 1–25 mega volt ampere, 92/13.2 kilovolt (kV) transformer bank to meet the Project's electrical demands. The substation would also include new 92 kV transmission line extensions, associated distribution feeders/backbones, and distribution line extensions.[8]

The construction of the Coachella Airport Business Park Development is planned to occur in multiple phases, spanning a significant period, and is anticipated to overlap with operational activities. The project is scheduled for three phases[9];

- Phase I construction is estimated to take approximately one to five years following Project approvals, with a projected start in Fall 2027.
- Phase II is anticipated to occur over approximately five to 10 years.
- Phase III is projected to occur over approximately 20 years.

This phased approach indicates that the overall construction, from initial groundbreaking to the completion of all three phases, will extend well beyond 2035. For the purpose of air quality and greenhouse gas (GHG) emission analyses, the aggregate total construction time for all three phases was analyzed as 3.2 years, to represent a worst-case scenario.[10]

Based on a review of aerial photographs, South Coast AQMD staff found that the nearest sensitive receptor (e.g., residential development) is located 50 feet to the south of the project site, across Airport Blvd.

South Coast AQMD Comments

Use of EMFAC2021 Instead of EMFAC2025

According to the DEIR and Appendix B – Air Quality, Energy, Greenhouse Gas emissions and Health Risk Assessment Impact Analysis, the Lead Agency utilizes EMFAC 2021 emission factors as the methodology for the Proposed Project's analysis. According to CARB, the EMFAC 2025[11] was officially released in May 2025. Since the Proposed Project's DEIR was prepared in July 2025, South Coast AQMD staff recommends that the Lead Agency revise the emissions calculations utilizing the EMFAC 2025 emissions factors and include them in the Final EIR.

Outdated AERMET and Meteorological Data Used in AERMOD Modeling

Appendix B of the DEIR indicates that meteorological data processed by AERMET version 16216 (version 9) were used for the modeling. However, South Coast AQMD released a newer, approved

[7] *Ibid.*
[8] *Ibid.*
[9] DEIR, page 2.0-8
[10] DEIR, page 4.3-16.
[11] CARB EMFAC 2021. Access at: https://arb.ca.gov/emfac

version of AERMOD-ready MET data files (Version 11) in October 2023.[12] The updated dataset was developed using the U.S. EPA's AERMET processor Version 22112, along with pre-processors AERMINUTE Version 15272 and AERSURFACE Version 20060.[13] The U.S. EPA's current preferred and recommended meteorological data preprocessor for the AERMOD , as of the latest release, is AERMET version 24142, released in November 2024.[14]

Use of outdated meteorological data and model versions is inconsistent with the U.S. EPA's Guideline on Air Quality Models (40 CFR Part 51, Appendix W)[15] and may result in inaccurate or non-conservative health risk estimates. To ensure accuracy and consistency with federal modeling guidelines, the Lead Agency should re-run the dispersion modeling using the more recent meteorological data processed by the most recent U.S. EPA-recommended versions of AERMET (version 24142), revise the health risk results accordingly, and include the updated results in the Final EIR.

Incorrect Pollutant Averaging Time

South Coast AQMD staff's review of the dispersion modeling files noted that the PM2.5 pollutant type and averaging time of 24-Hour and annual[16] keywords were selected for the pollutant averaging time in the control pathway in the AERMOD model. However, according to the South Coast AQMD Risk Assessment Procedures v9.0 and South Coast AQMD Modeling Guidance for AERMOD,[17] a detailed HRA utilizing AERMOD should be run using the "OTHER" type and pollutant averaging time 1-hour and PERIOD.

In addition, South Coast AQMD staff's review of the modeling files noted that industrial buildings were not included in the building downwash option in the AERMOD dispersion model during operation which resulted in an underestimation of the ground-level pollutant concentrations near the buildings.

Thus, the Lead Agency is recommended to: 1) re-run the construction and operational HRAs to utilize 1-hour and PERIOD averaging time to determine the health risk impacts to the sensitive receptors and off-site workers and include the industrial buildings in the building downwash to analyze more accurate ground-level concentrations; and 2) include the results in the Final EIR.

Health Risk Assessment (HRA) during Project Operation

CEQA Guidelines Sections 15126.2 and 15126.4 require a DEIR to include a description of the significant environmental effects of a Proposed Project, significant environmental effects which

[12] South Coast AQMD AERMOD-Ready MET Data Files available at https://www.aqmd.gov/assets/aermet/AERMET_files_And_HRA_Tool.html
[13] South Coast AQMD Data for AERMOD available at https://www.aqmd.gov/home/air-quality/meteorological-data/data-for-aermod
[14] U.S. EPA Air Quality Dispersion Modeling - Preferred and Recommended Models available at https://www.epa.gov/scram/meteorological-processors-and-accessory-programs
[15] Code of Federal Regulations. Title 40. Part 51. Appendix W available at https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-51/appendix-Appendix%20W%20to%20Part%2051
[16] South Coast AQMD Risk Assessment Procedures v9.0. Access at: https://www.aqmd.gov/docs/default-source/permitting/hra-procedures/hraprocedures9-0_103124.pdf
[17] South Coast AQMD Modeling Guidance for AERMOD. Access at: South Coast AQMD Modeling Guidance for AERMOD

cannot be avoided, significant irreversible environmental changes, growth-inducing impacts, and mitigation measures proposed to minimize the significant adverse impacts. An impact is considered significant under CEQA if it leads to a "substantial, or potentially substantial, adverse change in the environment." In addition to the air quality impacts from the criteria air pollutants and greenhouse gases, the adverse air quality health risk impacts associated with increased emissions of toxic air contaminants (TACs) from all sources (including but not limited to expected future permitted stationary and portable sources, mobile sources, and other emission sources) during the operation phases need to be appropriately evaluated using qualitative and/or quantitative approaches to justify whether there will be potentially substantial adverse impacts.

The Appendix B of the DEIR indicate that the operational risks from the proposed gas station was prepared using the South Coast AQMD's Risk Tool (V1.103). However, this tool is only applicable to CEQA permitting projects and is not applicable to Proposed Project.

As mentioned earlier in this letter, the aerial maps indicate that the nearest sensitive receptor, a residential area, is located adjacent to or within 50 feet south of the Proposed Project site. As such, the Lead Agency is recommended to conduct an operational phase HRA, which should include evaluating truck emissions (including the truck routes to and from the site, truck loading/unloading docks, and their proximity to the sensitive receptors) and the impact of diesel-powered stationary and portable sources under the foreseeable probable future conditions. An HRA assessment is essential for determining the potential cancer risk impacts associated with the operation of the Proposed Project to the offsite sensitive receptors and workers so that they can be compared to the South Coast AQMD Air Quality Significance Thresholds for TACs[18] to determine whether there will be a potentially significant air quality impact. The analysis should also disclose the potential health risks for chronic and acute impacts of the Proposed Project's operation on residents living and/or workers working outside the Proposed Project's boundary in the Revised DEIR or Final EIR.

Hauling Mileage Information During Construction

The Proposed Project's construction activities include site preparation, grading, building construction, paving, and architectural coating.[19] Appendix B of the DEIR indicates that the Proposed Project would require approximately 21,040 cubic yards of soil import which would generate a total of 2,630 haul truck trips.[20] According to the DEIR, the Proposed Project site would be serviced by the Badlands Landfill and Burrtec landfill facilities which are located 69 miles and 31 miles from the project site, respectively.[21] However, the haul truck length trip in CalEEMod analysis shows 20 miles. Thus, the air quality analysis during construction is potentially underestimated in the DEIR. It is essential to include all the emission sources in the air quality analysis to determine the significance level during construction and propose all the feasible mitigation measures to reduce or minimize the impacts. In addition, the information and assumptions should be consistent throughout the CEQA document and its appendices. The Lead Agency is recommended to revise CalEEMod and the DEIR to update the haul truck distances to reflect the maximum potential haul trip distances to 69 miles.

[18] South Coast AQMD Air Quality Significance Thresholds available at: https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf
[19] DEIR. Table 4.6-2, page 4.6-8.
[20] Appendix B – Air Quality, Energy, Greenhouse Gas emissions and Health Risk Assessment Impact Analysis, page 43.
[21] *Ibid*. CalEEMod, page 183.

Use of South Coast AQMD's Mass Rate Localized Significance Threshold (LST) Look-Up Table to Analyze the Proposed Project's Localized Air Quality Impact appears Inconsistent with Guidance for the LST Methodology

The localized significance threshold (LST) analysis in the DEIR appears to incorrectly rely on the LST screening tables to determine the significance of localized air quality impacts. As indicated in Table 3-2 of the LST methodology,[22] these screening tables are not applicable for projects larger than five acres. Since the Proposed Project site size is 47.96 acres and is located in close proximity to sensitive receptors, including residential uses as noted earlier in this letter, reliance on the LST screening tables may underestimate localized air quality impacts. Therefore, it is recommended that the Lead Agency conduct project-specific dispersion modeling to accurately assess the localized air quality impacts from both construction and operational phases of the Proposed Project and compare the results to the Ambient Air Quality Standards for Criteria Pollutants on the South Coast AQMD Air Quality Significance Thresholds[23] and include the results in the Final EIR.

Potential Underestimation of Emissions Due to Imprecise Assumptions for Truck Trip Lengths and Trip Rates in Emissions Analysis

Appendix B of the DEIR explains that air quality impact analysis was based on the assumption that the average truck trip length is 20 miles. However, the project site is located approximately 150 miles away from the Ports of Los Angeles and Long Beach which means that the air quality analysis underestimated the emissions from trucks traveling from the Ports to the project site. For this reason, the Lead Agency is recommended to revise the Final EIR using project-specific assumptions for vehicle trip lengths and rates, including applying more conservative trip lengths such as designating specific mileage distance for local trips and 150 miles for Port-related trips. Tailoring these parameters and assumptions to be based on project-specific data will ensure a more accurate assessment of emissions, accounting for the unique circumstances and logistical realities of the Proposed Project.

Railroad Adjacent to The Project Site

Based on the review of an aerial photograph and the DEIR, the Proposed Project site is located adjacent to a railroad.[24] The DEIR should explain whether transportation by railroad will be utilized for this project. If so, locomotive emissions should be included in the air quality analysis and Health Risk Assessment (HRA) in the revised CEQA document.

AB 617 ECV CERP Alignment

The Proposed Project area includes the Assembly Bill 617 (AB 617) designated Eastern Coachella Valley (ECV) community and is heavily impacted by air pollution generated from sources such as the Salton Sea, pesticides, fugitive road dust, open burning and illegal dumping, diesel mobile

[22] South Coast AQMD Final Localized Significance Threshold Methodology available at: https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf

[23] South Coast AQMD Air Quality Significance Thresholds available at: https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf

[24] DEIR, page 4.6-1.

sources, Greenleaf Desert View Power Plant, and land use issues. As part of the AB 617 process, South Coast AQMD is required to work with a Community Steering Committee (CSC) to develop a Community Emission Reductions Plan (CERP) that identifies air quality priorities and related actions to address those air quality priorities and reduce air pollution in the community. The South Coast AQMD Governing Board adopted the ECV CERP on June 4, 2021. South Coast AQMD staff recommends that the Lead Agency review the actions to reduce air pollution in the ECV community included in Chapter 5 of the ECV CERP, which can be found here: https://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/eastern-coachella-valley/final-cerp/final-cerp-july-2021.pdf?sfvrsn=9#page=101. South Coast AQMD staff also recommends the Lead Agency continue working with South Coast AQMD to explore whether additional measures to further reduce emissions can be identified and implemented at the Proposed Project to support actions in the ECV CERP.

Air Quality Mitigation Measures for NOx and PM Emissions from Construction

According to the CARB Strategies for Reducing Emissions from Off-Road Construction Equipment, the implementation of off-road Tier 5 starting in 2027 or 2028 and the Governor's Executive Order in September 2020 requires CARB to develop and propose a full transition to Zero Emissions (ZE) by 2035.[25] Considering the scope of the project, it is crucial to ensure that the levels of construction emissions, specifically NOx and PM_{10}, remain below significant thresholds during the construction period for each proposed individual project. Moving towards achieving this goal, where feasible, involves opting for electric emission-free engines instead of diesel-fueled engines for the construction equipment. This proactive choice not only aligns with environmental concerns but also demonstrates a commitment to minimizing the project's environmental footprints. The abatement of NOx can also be pursued by enforcing greener constructions, such as, limiting the usage of older engines in favor of adopting the latest available technologies, or even incorporating exhaust retrofits such as cutting-edge exhaust aftertreatment techniques. Additionally, several other resources to assist the Lead Agency with identifying additional potential mitigation measures for the Proposed Project are included in the South Coast AQMD's CEQA Air Quality Handbook[26] for both operational and construction emissions.

Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program

On May 7, 2021, South Coast AQMD's Governing Board adopted Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program, and Rule 316 – Fees for Rule 2305. Rules 2305 and 316 are new rules that will reduce regional and local emissions of nitrogen oxides (NOx) and particulate matter (PM), including diesel PM. These emission reductions will reduce public health impacts for communities located near warehouses from mobile sources that are associated with warehouse activities. Also, the emission reductions will help the region attain federal and state ambient air quality standards. Rule 2305 applies to owners and operators of warehouses greater than or equal to 100,000 square feet. Under Rule 2305, operators are subject to an annual WAIRE Points Compliance Obligation that is calculated based

[25] Presentation can be found at: https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/combined-construction-carb-amp-aqmp-presentations-01-27-21.pdf

[26] South Coast AQMD's CEQA Air Quality Handbook, Available at: https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook

on the annual number of truck trips to the warehouse. WAIRE Points can be earned by implementing actions in a prescribed menu in Rule 2305, implementing a site-specific custom plan, or paying a mitigation fee. Warehouse owners are only required to submit limited information reports, but they can opt to earn Points on behalf of their tenants if they so choose because certain actions to reduce emissions may be better achieved at the warehouse development phase, for instance the installation of solar and charging infrastructure. Rule 316 is a companion fee rule for Rule 2305 to allow South Coast AQMD to recover costs associated with Rule 2305 compliance activities. Since the Proposed Project consists of the development of a total of 329,100 square feet warehouses, the Proposed Project's warehouse owners and operators will be required to comply with Rule 2305 once the warehouse is occupied. Therefore, South Coast AQMD staff recommends that the Lead Agency review South Coast AQMD Rule 2305 to determine the potential WAIRE Points Compliance Obligation for future operators and explore whether additional project requirements and CEQA mitigation measures can be identified and implemented at the Proposed Project that may help future warehouse operators meet their compliance obligation[27]. South Coast AQMD staff is available to answer questions concerning Rule 2305 implementation and compliance by phone or email at (909) 396-3140 or waire-program@aqmd.gov. For implementation guidance documents and compliance and reporting tools, please visit South Coast AQMD's WAIRE Program webpage.[28]

Additional Recommended Air Quality and Greenhouse Gases Mitigation Measures and Project Design Considerations

CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse air quality impacts. To further reduce the Proposed Project's air quality impacts, South Coast AQMD recommends incorporating the following mitigation measures and project design considerations into the Final EIR.

Mitigation Measures for Operational Air Quality Impacts

Mobile Sources

1. Require zero-emission (ZE) or near-zero emission (NZE) on-road haul trucks, such as heavy-duty trucks with natural gas engines that meet the CARB's adopted optional NOx emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr), if and when feasible.

   Note: Given the state's clean truck rules and regulations aiming to accelerate the utilization and market penetration of ZE and NZE trucks, such as the Advanced Clean Trucks Rule and the Heavy-duty Low NOx Omnibus Regulation, ZE and NZE trucks will become increasingly more available to use.

2. Require a phase-in schedule to incentivize the use of cleaner operating trucks to reduce any significant adverse air quality impacts.

[27] South Coast AQMD Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program. Accessed at: http://www.aqmd.gov/docs/default-source/rule-book/reg-xxiii/r2305.pdf.
[28] South Coast AQMD WAIRE Program. Accessed at: http://www.aqmd.gov/waire.

Note: South Coast AQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency.

3. Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the Final EIR. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the Proposed Project through CEQA prior to allowing this higher activity level.

Other Area Sources

1. Maximize the use of solar energy by installing solar energy arrays.

2. Use light-colored paving and roofing materials.

3. Utilize only Energy Star heating, cooling, and lighting devices and appliances.

Design Considerations for Reducing Air Quality and Health Risk Impacts

1. Clearly mark truck routes with trailblazer signs so that trucks will not travel next to or near sensitive land uses (e.g., residences, schools, daycare centers, etc.).

2. Design the Proposed Project such that truck entrances and exits are not facing sensitive receptors and trucks will not travel past sensitive land uses to enter or leave the Proposed Project site.

3. Design the Proposed Project such that any truck check-in point is inside the Proposed Project site to ensure no trucks are queuing outside.

4. Design the Proposed Project to ensure that truck traffic inside the Proposed Project site is as far away as feasible from sensitive receptors.

5. Restrict overnight truck parking in sensitive land uses by providing overnight truck parking inside the Proposed Project site.

Lastly, the South Coast AQMD also suggests that the Lead Agency conduct a review of the following references and incorporating additional mitigation measures as applicable to the Proposed Project in the Final EIR:

1. State of California – Department of Justice: Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act[29]

2. South Coast AQMD 2022 Air Quality Management Plan,[30] specifically:

[29] State of California – Department of Justice, Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act. Available at: https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf
[30] South Coast AQMD, 2022 Air Quality Management Plan (AQMP). Available at: http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan

a) Appendix IV-A – South Coast AQMD's Stationary and Mobile Source Control Measures

b) Appendix IV-B – CARB's Strategy for South Coast

c) Appendix IV-C – SCAG's Regional Transportation Strategy and Control Measure

3. United States Environmental Protection Agency (U.S. EPA): Mobile Source Pollution - Environmental Justice and Transportation.[31]

South Coast AQMD Air Permits and Role as a Responsible Agency

If implementation of the Proposed Project would require the use of new stationary and portable sources, including but not limited to emergency generators, fire water pumps, boilers, etc., air permits from South Coast AQMD will be required. The final CEQA document, should include a discussion about the potentially applicable rules that the Proposed Project needs to comply with. Those rules may include, for example, Rule 201 – Permit to Construct,[32] Rule 203 – Permit to Operate,[33] Rule 401 – Visible Emissions,[34] Rule 402 – Nuisance,[35] Rule 403 – Fugitive Dust,[36] Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,[37] Rule 1113 – Architectural Coating,[38] Regulation XIII – New Source Review,[39] Rule 1401 – New Source Review of Toxic Air Contaminants,[40] Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities, [41]Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants,[42] Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines,[43] etc. It is important to note that when air permits from South Coast AQMD are required, the role of South Coast AQMD would change from a Commenting Agency to a Responsible Agency under CEQA. In addition, if South Coast AQMD is identified as a Responsible Agency, per CEQA Guidelines Sections 15086, the Lead Agency is required to consult with South Coast AQMD.

CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of the process for conducting a review of the Proposed Project and issuing discretionary approvals. Moreover, it is important to note that if a Responsible Agency determines that a CEQA document is not adequate to rely upon for its discretionary approvals, the Responsible Agency must take further actions listed in CEQA Guideline Section 15096(e), which could have the effect of delaying the implementation of the Proposed Project. In its role as CEQA Responsible Agency, the South Coast

[31] United States Environmental Protection Agency (U.S. EPA), Mobile Source Pollution - Environmental Justice and Transportation. Available at: https://www.epa.gov/mobile-source-pollution.
[32] South Coast AQMD. Rule 201 available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf
[33] South Coast AQMD. Rule 203 available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf
[34] South Coast AQMD. Rule 401 available at: https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf
[35] South Coast AQMD. Rule 402 available at: https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf
[36] South Coast AQMD. Rule 403 available at: https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403
[37] South Coast AQMD. Rule 1110.2 available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf
[38] South Coast AQMD. Rule 1113 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf
[39] South Coast AQMD. Regulation XIII available at: https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii
[40] South Coast AQMD. Rule 1401 available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf
[41] South Coast AQMD. Rule 1403 available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1403.pdf
[42] South Coast AQMD. Rule 1466 available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf
[43] South Coast AQMD. Rule 1470 available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf

AQMD is obligated to ensure that the CEQA document prepared for this Proposed Project contains a sufficient project description and analysis to be relied upon in order to issue any discretionary approvals that may be needed for air permits.

For these reasons, the final CEQA document should be revised to include a discussion about any and all new stationary and portable equipment requiring South Coast AQMD air permits, provide the evaluation of their air quality and greenhouse gas impacts, and identify South Coast AQMD as a Responsible Agency for the Proposed Project as this information will be relied upon as the basis for the permit conditions and emission limits for the air permit(s). Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions regarding what types of equipment would require air permits. For more general information on permits, please visit South Coast AQMD's webpage at https://www.aqmd.gov/home/permits.

Conclusion

As set forth in California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), the Lead Agency shall evaluate comments from public agencies on the environmental issues and prepare a written response at least 10 days prior to certifying the Final EIR. As such, please provide South Coast AQMD written responses to all comments contained herein at least 10 days prior to the certification of the Final EIR. In addition, as provided by CEQA Guidelines Section 15088(c), if the Lead Agency's position is at variance with recommendations provided in this comment letter, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided.

Thank you for the opportunity to provide comments. 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 Jivar Afshar, Air Quality Specialist, at jafshar@aqmd.gov should you have any questions.

Sincerely,

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SW:JA

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