South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL: January 15, 2026

mevans@cityofperris.org
Mathew Evans, Contract Planner
City of Perris, Planning Division
135 North D Street
Perris, CA 92570

Draft Environmental Impact Report (EIR) for the Proposed The Cubes at Placentia Industrial Project (Proposed Project) (SCH No.: 2023120020)

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

Summary of Project Information in the Draft EIR

Based on the Draft EIR, the Proposed Project would involve the construction and operation of a 578,265-square-foot (sf) warehouse facility on approximately 27.76 acres,[1] along with roadway access improvements to Wilson Avenue.[2] The Project site is bounded by Placentia Avenue to the south, Wilson Avenue to the west, and the existing Perris Valley Storm Drain Channel to the east.[3] The Proposed Project would include a total of 104 truck dock doors, consisting of 54 dock doors on the north side of the building and 50 dock doors on the south side.[4] Operational activities associated with the Proposed Project would generate an estimated 22 two-axle, 28 three-axle, and 83 four-axle truck round-trips per day.[5] Based on a review of aerial imagery, the nearest existing sensitive receptors, including residential land uses, are located within approximately 100 feet south of the Project boundary. Construction of the Proposed Project is anticipated to occur in a single phase, commencing no earlier than spring 2025 and extending over an approximate 12-month duration, while operation is expected by 2026.[6]

South Coast AQMD Comments

Outdated Meteorological Data in the Health Risk Assessment Modeling

Appendix B (Air Quality, Global Climate Change, HRA, and Energy Impact Analysis) of the Draft EIR indicates that the representative meteorological (MET) station for the health risk assessment

[1] Draft EIR. p. 2-2.
[2] *Ibid*. p. 2-4.
[3] *Ibid*. p. 2-1.
[4] *Ibid*. p. 2-8.
[5] Appendix B – Air Quality, Global Climate Change, HRA, and Energy Impact Analysis. p. 34.
[6] *Ibid*. p. 2-8.

(HRA) is the Perris monitoring station (PERI) with full five years of MET data from January 1, 2012, to December 31, 2016.[7] In addition, based on the technical files provided by the Lead Agency, the MET data used in modeling is the PERI Version 9.

It should be noted that this data corresponds to Version 9 of South Coast AQMD's AERMOD-ready MET dataset, which is no longer available or recommended for use. South Coast AQMD released an updated version of AERMOD-ready meteorological data (Version 11) in October 2024.[8] This updated dataset was developed using the U.S. EPA's AERMET processor (Version 22112), along with AERMINUTE (Version 15272) and AERSURFACE (Version 20060), and reflects current regulatory guidance and processing methodologies.

To ensure technical accuracy, transparency, and consistency with the current South Coast AQMD recommendations, the Lead Agency is recommended to:

- Reassess the selection of meteorological data using the latest Version 11 dataset;
- Revise the HRA modeling inputs accordingly; and
- Include updated air quality modeling results in the Final EIR.

This approach will ensure that air dispersion modeling is based on the most recent and appropriate meteorological data, thereby supporting a robust and defensible environmental analysis.

Truck Idling Duration and Emissions Modeling

Draft EIR and the technical file provided by the Lead Agency labeled *DPM_SR with 24-hour day operation*, an assumption of 15 minutes of idling per truck per day was used to estimate diesel particulate matter (DPM) emissions for the health risk assessment (HRA).[9] However, the actual idling times may be longer in duration since the Proposed Project is anticipated to involve a total of 133 truck trips per day. Moreover, it is reasonable to expect that individual trucks may experience extended periods of idling due to on-site queuing, security checks, staging, loading, and unloading operations, among other factors, particularly during peak hours or in congested circulation areas. As such, a 15-minute idling duration may underestimate actual on-site idling behavior and, consequently, DPM emissions, which are a key contributor to localized health risks.

While the California Air Resources Board (CARB) limits diesel truck idling to five minutes as set forth in the Airborne Toxic Control Measure (ATCM), an exemption from this requirement is allowed for trucks equipped with engines that meet the optional low-NOx idle emission standard, which is typically applicable to model year 2008 and newer trucks. These vehicles, often referred to as "clean idle" certified, are permitted to idle longer than five minutes when situated more than 100 feet from sensitive land uses such as homes and schools.[10] Furthermore, CARB's EMFAC2021 Volume III Technical Document (Table 4.4.2-5) indicates that heavy-duty trucks

[7] Appendix B. p. 44.
[8] South Coast AQMD AERMOD-Ready MET Data Files available at https://www.aqmd.gov/assets/aermet/AERMET_files_And_HRA_Tool.html
[9] *Ibid*. p. 4.2-23 and Technical File Labeled "DPM_SR with 24-hour day operation"
[10] CARB, Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling was promulgated in Chapter 13 of the California Code of Regulations, Section 2485: Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling, available at https://ww2.arb.ca.gov/sites/default/files/2022-06/13_CCR_2485_OAL_06222022-2_ADA_06272022_0.pdf

may idle for up to five hours at a single location under certain conditions.[11] For these aforementioned reasons, as a practical matter, the idling duration for onsite heavy-duty trucks visiting the Proposed Project site could idle for a much longer duration than what was analyzed in the Draft EIR. Thus, the HRA may have substantially underestimated the full extent of operational health risks associated with the DPM emissions from the anticipated onsite heavy-duty truck activities.

Accurate characterization of idling activity is essential to fully assess the potential health risk impacts, particularly for nearby sensitive receptors. Therefore, to ensure the HRA provides an accurate and health-protective estimate of potential exposure, the Lead Agency is recommended to either: 1) revise the operational emissions modeling in the Final EIR to assume a minimum of 30 minutes of idling per truck per day, unless site-specific data or operational constraints justify a shorter duration; or 2) provide empirical evidence, such as facility-specific queuing and processing time studies, vehicle circulation modeling, or comparable industry data, to substantiate the 15-minute assumption as representative of expected operations of the Proposed Project.

Recommended Revision to Health Risk Assessment Analysis and Results

Section 4.2 (Air Quality) of the Draft EIR presents the Health Risk Assessment (HRA) for the Proposed Project and reports a maximum incremental cancer risk of 2.32 in one million at Receptor Location 3 (coordinates 480481.51, 3742521.83).[12] Figure 1 (from Appendix B) provides a snapshot of the AERMOD modeling results and identifies the receptor locations used in the analysis. Based on Figure 1, the maximum modeled concentration is 5.5×10^{-3} micrograms per cubic meter ($\mu g/m^3$).[13] However, a review of the AERMOD modeling files provided by the Lead Agency indicates discrepancies between the concentrations reported in Appendix B and those generated directly from the modeling output. Specifically, the same AERMOD modeling file yields a maximum modeled concentration of approximately 0.201 $\mu g/m^3$,[14] which is substantially higher than the maximum concentration reported in Appendix B.

In addition, Appendix B reports a concentration of 0.00312 $\mu g/m^3$ at Receptor Location 3,[15] corresponding to the stated maximum cancer risk of 2.32 in one million. Further review of the provided AERMOD output files indicates that the modeled concentration at Receptor Location 3 is approximately 0.00825 $\mu g/m^3$,[16] which would correspond to an estimated cancer risk of approximately 7 in one million, assuming the same risk calculation methodology and unit risk factors used in the HRA.

These inconsistencies between the concentrations and cancer risk values reported in Appendix B and those derived directly from the AERMOD modeling files provided by the Lead Agency raise concerns regarding the accuracy and transparency of the HRA presented in the Draft EIR. These discrepancies affect the public's ability to evaluate the magnitude of health risks and undermine confidence in the Draft EIR's conclusion that impacts are less than significant. Under CEQA, an

[11] CARB, EMFAC2021 Volume III Technical Document, Table 4.4.2-5, p. 161., available at https://ww2.arb.ca.gov/sites/default/files/2021-03/emfac2021_volume_3_technical_document.pdf
[12] *Ibid*. p. 4.2-39.
[13] Appendix B. p. 57.
[14] Provided AEMORD Modeling File.
[15] Appendix B. Tables 15-18. p. 50-53.
[16] Provided AERMOD Output File Labeled 19484 Placentia Avenue Industrial.ADO. p. 76.

EIR must provide accurate, consistent, and internally coherent technical analyses to support its conclusions and to allow decision-makers and the public to meaningfully evaluate potential environmental and public health impacts.

Accordingly, the Lead Agency is recommended to re-examine the HRA, verify the modeled concentration outputs, and revise the cancer risk calculations as necessary to ensure consistency between the modeling files, results tables, figures, and narrative discussion. The corrected modeling results and corresponding health risk estimates should be clearly documented and presented in the Final EIR. Even if the revised cancer risk values remain below applicable significance thresholds and are ultimately determined to be less than significant, the Final EIR should disclose the correct concentrations and associated cancer risk estimates to accurately characterize the potential health risk impacts of the Proposed Project on nearby sensitive receptors, consistent with CEQA requirements for full disclosure and informed decision-making.

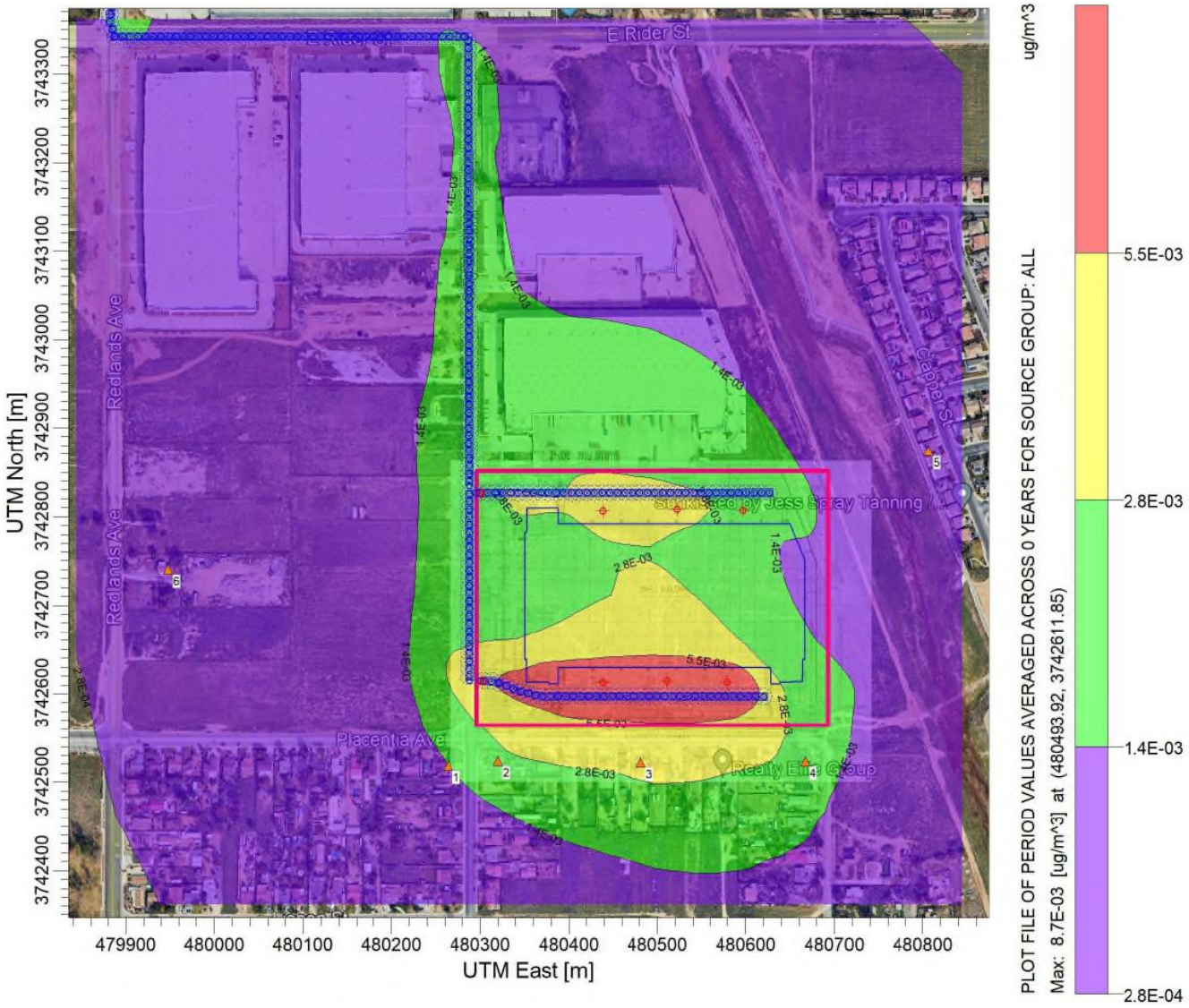

Figure 1: Snapshot from Appendix B

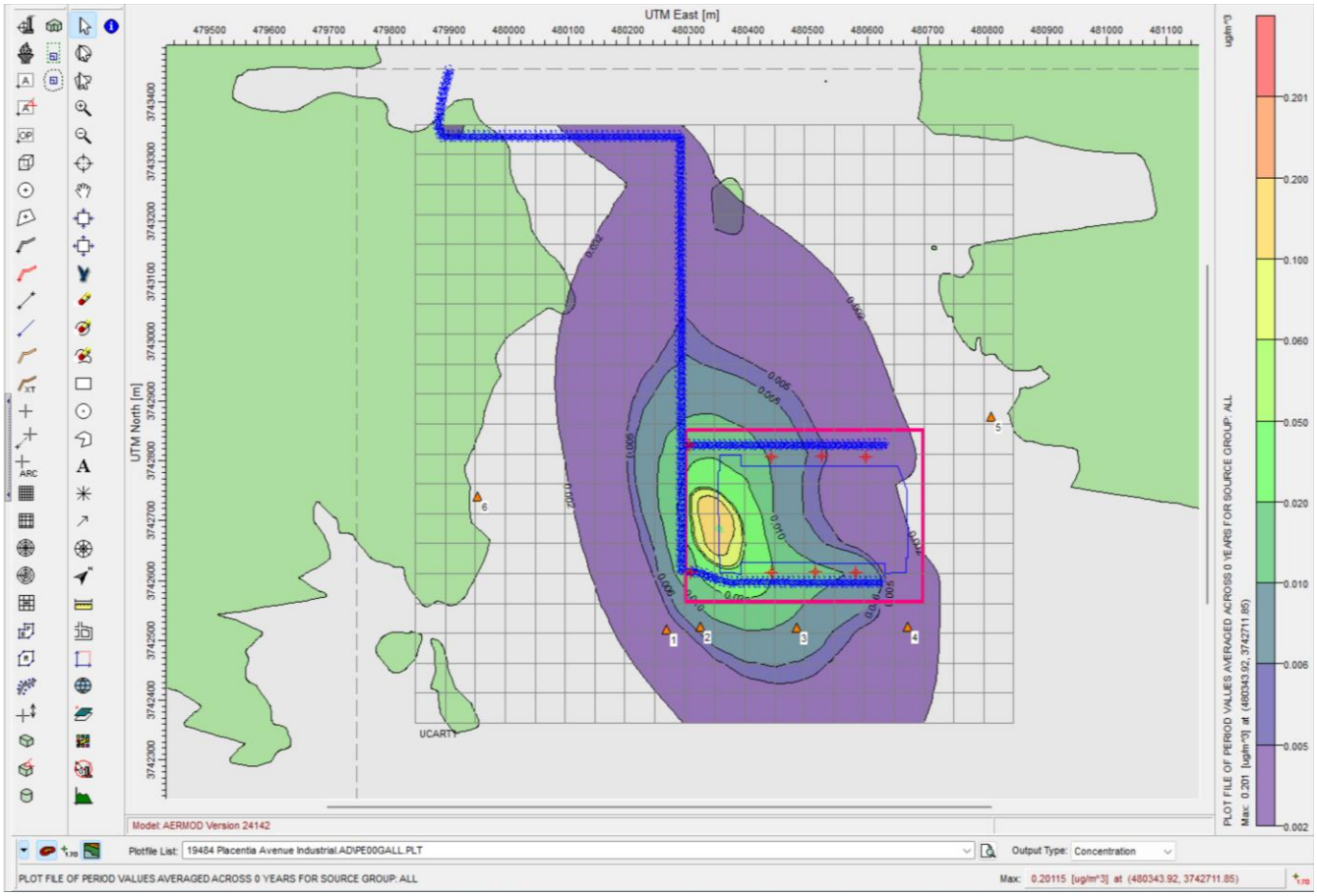

Figure 2: Snapshot from the Provided AERMOD Modeling File by the Lead Agency

Inappropriate Use of South Coast AQMD's Mass Rate Localized Significance Threshold Look-Up Table to Analyze the Proposed Project's Localized Air Quality Impact

The analysis of localized significance thresholds (LSTs) in the Draft EIR appears to rely on the South Coast AQMD LST screening tables to assess localized air quality impacts associated with both construction and operational activities. However, as outlined in Table 3-2 of the South Coast AQMD Final LST Methodology guidance,[17] the screening tables are not intended for projects with a disturbed area exceeding five acres. Given that the Proposed Project encompasses approximately 27.76 acres, which is well above the five-acre screening applicability limit in LST, the reliance on the screening tables for operation is inappropriate because the localized pollutant concentrations are likely underestimated.

To ensure an accurate and technically robust assessment of potential localized air quality impacts, the Lead Agency is recommended to conduct project-specific air dispersion modeling, which quantifies the concentrations of criteria pollutants at sensitive receptor locations during the operational phase, and incorporate the results into the Final EIR.

[17] South Coast AQMD's Final LST Methodology available at https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf

Cumulative Impacts During Operations

Based on the Draft EIR, the Proposed Project would develop a 578,265-square-foot warehouse facility on approximately 27.76 acres within the Perris Valley Commerce Center Specific Plan (PVCCSP) planning area. The PVCCSP was adopted by the City of Perris pursuant to a certified Environmental Impact Report (EIR) on January 10, 2012.[18] Prior to certification, a Draft EIR for the PVCCSP was circulated for public review and comment between July 20, 2011, and September 6, 2011.[19] During the public review period for the PVCCSP Draft EIR, South Coast AQMD submitted comments recommending that the Lead Agency include a more comprehensive and robust analysis of cumulative air quality and air toxics impacts in the Final EIR.[20] Specifically, South Coast AQMD requested that the Lead Agency revisit and refine the estimated number of truck trips projected to serve the site, provide additional analysis demonstrating that project operations would not result in significant air quality or air toxics impacts to nearby sensitive receptors, and evaluate additional mitigation measures to further reduce any potentially significant air quality and air toxics impacts. Since its adoption in 2012, the PVCCSP has been revised and amended numerous times, with the most recent amendment, Perris Valley Commerce Center Specific Plan Amendment No. 12, approved on January 11, 2022.[21] Despite these revisions, the cumulative impacts associated with the amended and additional projects within the PVCCSP planning area have not been comprehensively updated. Furthermore, neither the PVCCSP nor the Draft EIR for the Proposed Project includes a robust and up-to-date analysis of cumulative air quality and air toxics impacts from the full buildout of existing, approved, and reasonably foreseeable future projects within the PVCCSP region.

Review of recent aerial photography indicates that several existing industrial and warehouse uses are located near the Proposed Project site. In addition, sensitive receptors, including nearby residential uses, are present in the surrounding area. Moreover, according to the City of Perris website under Planning – Environmental Documents for Public Review,[22] multiple development projects have been approved or are proposed in the vicinity of the Proposed Project. These include, but are not limited to, the MND for the First Industrial Warehouse 2 at Wilson Avenue Project[23] (October 2021), Conditions of Approval for the IDI Rider 2 and 4 High Cube Warehouses and Perris Valley Storm Drain Channel Improvement Project[24] (June 2021), and Final Mitigated Negative Declaration (MND) for the Redlands and Placentia Project[25] (April 2023). Notably, these projects would contribute additional DPM and other toxic air contaminants (TACs) emissions in an area where sensitive receptors are already present.

[18] ORDINANCE NUMBER 1284 available at https://www.cityofperris.org/home/showpublisheddocument/2923/637250482796800000
[19] Perris Valley Commerce Center Specific Plan Final EIR. 9.0 Introduction, Public Review Summary. Page 9.0-1 available at https://www.cityofperris.org/home/showpublisheddocument/2645/637455522835370000
[20] South Coast AQMD Comment letter for the Perris Valley Commerce Center Specific Plan available at https://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2011/september/perris-valley-commerce-center.pdf
[21] Perris Valley Commerce Center Specific Plan Amendment No. 12, approved January 11, 2022, available at https://www.cityofperris.org/home/showpublisheddocument/2647/637799977032200000
[22] City of Perris. Planning – Environmental Documents available at https://www.cityofperris.org/departments/development-services/planning/environmental-documents-for-public-review.
[23] First Industrial Warehouse 2 at Wilson Avenue Project available at https://www.cityofperris.org/home/showpublisheddocument/14666/637708591228930000
[24] Conditions of Approval for IDI Rider 2 & 4 High Cube Warehouses and Perris Valley Storm Drain Channel Improvement Project available at https://www.cityofperris.org/home/showpublisheddocument/25446/638882597399500000
[25] Redlands and Placentia Project available at https://www.cityofperris.org/home/showpublisheddocument/16796/638241587059130000

Pursuant to CEQA Guidelines Section 15065(a)(3), South Coast AQMD is particularly concerned with the potential for cumulative air quality impacts related to increased concentrations of TACs, including DPM, within the PVCCSP planning area. CEQA requires the evaluation of direct, indirect, and cumulative impacts. In recognition of the growing number of industrial projects within the South Coast Air Basin, South Coast AQMD has initiated a public process to develop additional guidance for evaluating cumulative air quality impacts from increased concentrations of air toxics. To date, six Working Group Meetings (WGMs) have been convened as part of this cumulative impact policy development effort. For more general information on the WGMs, please visit South Coast AQMD's webpage at https://www.aqmd.gov/home/rules-compliance/ceqa/ceqa-policy-development-(new).

Given the density of existing and proposed warehouses and industrial uses within the PVCCSP area, the presence of nearby sensitive receptors, and the absence of an updated cumulative air quality and air toxics analysis, the Lead Agency is recommended, at a minimum, prepare a qualitative cumulative air toxics impact analysis. Such an analysis should identify and discuss past, present, and reasonably foreseeable future projects in the vicinity and evaluate the potential for overlapping and additive air toxics emissions. Additionally, the Lead Agency is encouraged to consider preparing a more detailed quantitative cumulative air toxics and HRA, where feasible, to evaluate the combined potential health risk implications from the Proposed Project and surrounding development. The results of this cumulative analysis, along with any additional feasible mitigation measures, should be included and disclosed in the Final EIR to ensure compliance with CEQA's requirements for full disclosure and informed decision-making.

Recommended Revision to the Air Quality Mitigation Measures

Chapter 2 (Project Description) of the Draft EIR states that the Proposed Project site is located within the PVCCSP area of the City of Perris. The City has adopted the PVCCSP to guide development within approximately 3,500 acres, allowing for a mix of industrial, commercial, and office land uses, as well as supporting public facilities.[26]

Section 4.2 (Air Quality) of the Draft EIR indicates that the Proposed Project is consistent with and has incorporated applicable mitigation measures (MMs) from the PVCCSP, including MM Air 1, MM Air 10, and MM Air 15, through the preparation of a project-level air quality impact analysis.[27] Based on this analysis, the Draft EIR concludes that construction and operation-related air quality impacts, including regional emissions, localized criteria pollutant impacts, and potential health risk impacts, would be less than significant. In addition, Section 4.2 further acknowledges that additional air quality mitigation measures from the PVCCSP are applicable to the Proposed Project.[28] While reliance on the PVCCSP MMs is appropriate under CEQA tiering principles, several of these mitigation measures warrant re-evaluation to ensure they reflect current regulatory standards, technological advancements, and best available emission reduction practices. For instance, PVCCSP mitigation measure MM Air 6 requires the use of Tier 3 off-road diesel engines during construction.[29] While Tier 3 engines represented cleaner technology at the time the

[26] *Ibid*. p. 2-1.
[27] *Ibid*. p. 4.2-45.
[28] *Ibid*.
[29] *Ibid*. p. 4.2-46.

PVCCSP was adopted, they no longer reflect the cleanest or most effective emission control technology currently available, given subsequent advancements such as Tier 4 Final engines and zero-emission (ZE) or near-zero emission (NZE) construction equipment. As written, MM Air 6 may not fully achieve feasible emission reductions consistent with CEQA's mandate to mitigate significant environmental impacts to the extent feasible.

Accordingly, the Lead Agency is recommended to reexamine each applicable air quality mitigation measure from the PVCCSP and update the language, where appropriate, to reflect current best available control technologies and emission reduction strategies. This may include revising existing mitigation measures or adopting additional, project-specific measures that commit the Proposed Project to the use of the cleanest available equipment and operational practices, where technologically and economically feasible. Such revisions would strengthen the Proposed Project's enforceable mitigation commitments, enhance consistency with contemporary air quality planning objectives, and ensure that the Final EIR adequately demonstrates compliance with CEQA's mitigation requirements.

Additional Recommended Air Quality and Greenhouse Gas Mitigation Measures and Project Design Features for Consideration

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, the following mitigation measures and project design considerations are recommended to be incorporated into the Final EIR.

Mitigation Measures to Reduce Operational Air Quality Impacts from Mobile Sources

1. Require ZE or 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 CARB'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 for use.

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

   Note: South Coast AQMD staff are 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.

4. Provide electric vehicle (EV) charging stations or, at a minimum, provide electrical infrastructure, and electrical panels should be appropriately sized. Electrical hookups should be provided for truckers to plug in any onboard auxiliary equipment.

Mitigation Measures to Reduce Operational Air Quality Impacts from 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 incorporate 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[30]

2. South Coast AQMD 2022 Air Quality Management Plan,[31] specifically:

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

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

[30] 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
[31] 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

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

3. United States Environmental Protection Agency (U.S. EPA) Transportation, Air Quality, and Climate Change.[32]

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,[33] and Rule 316 – Fees for Rule 2305.[34] 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 sf. Under Rule 2305, operators are subject to an annual WAIRE Points Compliance Obligation that is calculated based 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 578,265 sf warehouse, 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. 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 of guidance documents and compliance and reporting tools, please visit South Coast AQMD's WAIRE Program webpage.[35]

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., one or more air permits from South Coast AQMD will be required. The Final EIR should include a

[32] United States Environmental Protection Agency (U.S. EPA) Transportation, Air Quality, and Climate Change available at https://www.epa.gov/transportation-air-pollution-and-climate-change

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

[34] South Coast AQMD Rule 316 – Fees for Rule 2305 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-iii/r316.pdf

[35] South Coast AQMD WAIRE Program available at http://www.aqmd.gov/waire.

discussion about the South Coast AQMD rules that may be applicable to the Proposed Project. Those rules may include, for example, Rule 201 – Permit to Construct,[36] Rule 203 – Permit to Operate,[37] Rule 401 – Visible Emissions,[38] Rule 402 – Nuisance,[39] Rule 403 – Fugitive Dust,[40] Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,[41] Rule 1113 – Architectural Coatings,[42] and Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines,[43] etc.

It is important to note that if air permits from the South Coast AQMD are required, South Coast AQMD's role under CEQA will become the Responsible Agency of the Proposed Project. Per CEQA Guidelines Section 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. Also, as set forth in CEQA Guidelines Section 15096(h), the Responsible Agency is required to make Findings in accordance with CEQA Guidelines Section 15091 for each significant effect of the project and issue a Statement of Overriding Considerations in accordance with CEQA Guidelines Section 15093, if necessary. Lastly, as set forth in CEQA Guidelines Section 15096(i), the Responsible Agency may file a Notice of Determination.

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 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.

[36] South Coast AQMD, Rule 201 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf
[37] South Coast AQMD, Rule 203 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf
[38] South Coast AQMD, Rule 401 available at https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf
[39] South Coast AQMD, Rule 402 available at https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf
[40] South Coast AQMD, Rule 403 available at https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403
[41] South Coast AQMD, Rule 1110.2 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf
[42] South Coast AQMD, Rule 1113 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf
[43] South Coast AQMD, Rule 1470 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf

Conclusion

As set forth in Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), the Lead Agency shall evaluate comments from public agencies on 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 are 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

Sam Wang
Program Supervisor, CEQA IGR
Planning, Rule Development & Implementation

SW:DN
RVC251210-02
Control Number