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Draft Program Environmental Impact Report (PEIR) for
Cabazon Infrastructure Plan and Cabazon Community Plan Project
(Proposed Project)
(SCH No.: 2026030377)

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to review the above-mentioned document. The County of Riverside 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 which are organized by topic of concern.

Summary of Proposed Project Information in the Draft PERI

Based on the Draft PEIR, the Proposed Project consists of Cabazon Infrastructure Plan (CIP) and Cabazon Community Plan. The Community Plan establishes a long-range land use vision to support anticipated growth, accommodating up to 22,888 new housing units and approximately 49.4 million square-feet of non-residential uses (including Commercial Retail, Mixed-Use Areas, Heavy and Light Industrial, Public Facilities, and Open Space). The CIP identifies the specific needs and alternatives for expanding public infrastructure to support the buildout envisioned in the Community Plan, including Domestic Water Supply and Distribution; Wastewater Collection and Treatment; Flood Control and Drainage Systems; Electric Power Supply; Natural Gas Supply; and Telecommunications and Broadband Services, as well as roadway upgrades and classification revisions to accommodate future growth and improve circulation.[1]

The Proposed Project is located within the northwestern portion of the County of Riverside, immediately to the east of the city of Banning. Sensitive receptors are located throughout and immediately surrounding the 7,769-acre plan area, including existing single- and multi-family residences and Cabazon Elementary School within the project boundary. Outside the project boundary, sensitive receptors include existing residences within the Morongo Reservation, particularly those situated along the project's northwestern boundary.

[1] Cabazon Infrastructure Plan and Cabazon Community Plan Project Draft Program Environmental Impact Report (PEIR), Chapter 2 – Project Description.

Construction of the Proposed Project is anticipated to occur incrementally over a 30-year period. The Draft PEIR Appendix B – Air Quality/Greenhouse Gas/Energy Data[2] used year 2027 as the start of operation.

South Coast AQMD Comments

Recommend Conducting a Quantitative or Qualitative Analysis of Regional and Localized Air Quality Impacts during Project Construction and Operation

Based on the Draft PEIR, only the regional air quality impacts during the Proposed Project operation have been provided by the Lead Agency in Appendix B – Air Quality/Greenhouse Gas/Energy Data,[3] with no analysis provided for the localized operational emissions and no analysis performed for constructional emissions (regional or localized). The Lead Agency has stated that the Draft PEIR does not contain analysis on air pollutant emissions from construction activities, since the Proposed Project is currently at a programmatic stage, and attempting to calculate precise short-term emissions for future developments would be speculative and infeasible. Also, as stated in the Draft PEIR, the quantitative operational localized significance threshold (LST) analyses were not performed for the Proposed Project, because specific site plans and the exact locations of sensitive receptors for future developments are unknown.

In addition, although the Draft PEIR identifies mitigation measures (MMs) intended to reduce air quality impacts,[4] it does not appear to quantify the resulting operational emissions after implementation of these MMs. This is particularly concerning since many air quality impacts are identified as significant and unavoidable. Even where an impact remains significant and unavoidable, the Draft PEIR should disclose emissions before and after mitigation so the public and decision-makers can understand how much the measures reduce emissions and why the remaining impact cannot be reduced further.

Additionally, the Infrastructure Plan and Community Plan would facilitate substantial new development and associated construction activities, including demolition, grading, excavation, hauling, building construction, paving, and architectural coating. The PEIR should therefore estimate reasonably foreseeable construction emissions and compare those emissions with applicable South Coast AQMD CEQA thresholds. Where construction mitigation is proposed, the PEIR should also quantify the expected reduction in emissions. The Draft PEIR should also address potential localized air quality effects from construction and operation, particularly where development-related emissions could affect nearby sensitive receptors and surrounding communities.

This approach is inconsistent with the scope of analysis required by CEQA for environmental review of a Community Plan. CEQA Guidelines section 15126 explains that *"all phases of a project must be considered when evaluating its impact on the environment," including planning, acquisition, development, and operation."* A community plan itself is a project subject to CEQA, and a community plan review is intended to evaluate the environmental consequences of the plan

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[2] Cabazon Infrastructure Plan and Cabazon Community Plan Project Draft PEIR, Appendix B – Air Quality/Greenhouse Gas/Energy Data, Pages 7-9.

[3] Cabazon Infrastructure Plan and Cabazon Community Plan Project Draft PEIR, Table 3.2-4.

[4] *Ibid*. Pages 3.2-31 to 3.2-35.

at a broader, programmatic level rather than defer meaningful environmental analysis until individual development projects are proposed. The California Attorney General's Office similarly recognizes that a community plan is a CEQA project and that CEQA review at the community plan level is intended to examine the "big picture" environmental effects of the long-term development framework established by the plan.[5] Additionally, pursuant to CEQA guidelines section 15064 – Determining the Significance of the Environmental Effects Caused by a Project, the Lead Agency's determination of whether an effect may be significant shall be based, to the extent possible, on scientific and factual data and requires consideration of direct and reasonably foreseeable indirect physical changes. However, the current analysis does not provide sufficient factual information and detailed analysis of an estimation of the potential air quality impact arising from the construction and operation of 22,888 residential units and 49.4 million square-feet of non-residential spaces in the designated area.

Consequently, the fact that individual future development projects have not yet been designed does not provide a sufficient basis for omitting analysis of reasonably foreseeable construction and operational emissions. The Community Plan establishes the land use framework, development capacity, zoning designations, and policies that would facilitate future development within the City. These activities are not speculative in the abstract; they are reasonably foreseeable consequences of implementing the Proposed Project. The PEIR should therefore evaluate their environmental effects to the extent they can reasonably be forecasted at the programmatic level.

Moreover, pursuant to CEQA guidelines section 15064, the Draft PEIR should also evaluate greenhouse gas (GHG) emissions associated with both construction and operation, quantify reasonably foreseeable construction and operational GHG emissions, evaluate the effectiveness of applicable GHG mitigation measures, and explain the basis for any conclusion that GHG impacts would be less than significant or significant and unavoidable. GHG emissions would result from construction activities, building energy use, transportation, and other activities associated with implementation of the Infrastructure Plan and Community Plan and the development it would facilitate.

Lastly, although the Proposed Project encompasses approximately 7,800 acres[6] and would be built out over approximately 30 years[7], the Draft PEIR does not analyze the potential overlap between construction and operational activities. Therefore, South Coast AQMD staff recommend that the Lead Agency revise the air quality analysis to include overlapping construction and operation activities. The estimated overlapping emissions should then be compared with South Coast AQMD's applicable regional air quality CEQA thresholds to determine their level of significance, and the results should be included in the Final PEIR. If the overlapping emissions analysis is not included in the Final PEIR, the Lead Agency should provide reasons for its omission supported by substantial evidence in the record.

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[5] Rob Bonta (Attorney General), State of California Department of Justice; CEQA and General Planning. Available at: https://oag.ca.gov/environment/ceqa/planning

[6] *Ibid*. Page 2-6.

[7] *Ibid*. Page 2-8.

In summary, the Lead Agency should revise the Draft PEIR to:

1. Quantify reasonably foreseeable construction emissions associated with the Community Plan 30-year buildout and the development facilitated by the Proposed Project.
2. Evaluate both localized and regional air quality impacts from construction and operation.
3. Quantify reasonably foreseeable construction and operational GHG emissions associated with implementation of the Community Plan and evaluate the effectiveness of applicable GHG mitigation measures.
4. Provide unmitigated and mitigated operational emissions, including the emission reductions resulting from the identified mitigation measures.
5. Provide unmitigated and mitigated construction emissions, where construction mitigation measures are proposed.
6. Analyze overlapping construction and operational emissions that could occur when new development is being constructed while existing or newly completed uses are operating and compare the resulting emissions with applicable South Coast AQMD thresholds.
7. Explain the basis for the significant-and-unavoidable conclusions using the mitigated and, where applicable, overlapping emissions estimates.
8. Evaluate additional feasible mitigation where significant impacts remain after implementation of the proposed measures.

Without this information, the Draft PEIR does not provide sufficient factual support or transparency regarding the magnitude of localized, regional, construction, operational, overlapping, and GHG emissions associated to the Community Plan, the effectiveness of the proposed mitigation measures, or the basis for its significance conclusions to the Proposed Project's air quality impacts.

Recommend Conducting *a Quantitative Analysis of Human Health Consequences*

Based on a review of Section 3.2 (Air Quality) of the Draft PEIR,[8] the Lead Agency does not provide a quantitative analysis of the potential human health consequences associated with those emissions. The February 2023 Friant Community Plan Update and Friant Ranch Specific Plan contained a detailed quantitative analysis of Human Health Consequences,[9] which demonstrates that this type of analysis can be performed.

For context, the Bloomington Business Park Specific Plan Project[10] was required to recirculate its Draft EIR following a legal challenge in San Bernardino County Superior Court (Case No. CIVSB2228456). In that proceeding, the court directed the County to set aside its prior approvals, finding that the EIR was legally inadequate with respect to its analysis of air quality impacts,

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[8] *Ibid*. Page 3.2-41.

[9] Quantitative Analysis of Human Health Consequences Analysis, Table 3.3-8. Available at: https://www.fresnocountyca.gov/files/sharedassets/county/v/1/vision-files/files/72347-friant-prr-deir_2-7-23.pdf

[10] Bloomington Business Park Specific Plan Project (SCH: 2020120545). Available at: https://ceqanet.lci.ca.gov/2020120545/10

including the application of the Friant Ranch methodology for evaluating health effects. As articulated in the court's ruling, *"a sufficient discussion of significant impacts requires not merely a determination of whether an impact is significant, but some effort to explain the nature and magnitude of the impact.*[11]*"* This standard underscores the requirement under CEQA that an EIR provide a meaningful, evidence-based analysis that allows decision-makers and the public to understand the extent and severity of a project's environmental and public health impacts.

Therefore, the Lead Agency should review the analyses in the above-referenced documents, perform a quantitative health effect analysis specific to the Proposed Project where feasible, and incorporate the results in the Final PEIR.

Incorporating Clean-Fleet / Clean-Construction as Mitigation and Context

The air quality analysis in the Draft PEIR concludes that the Proposed Project's regional operational emissions for volatile organic compounds (VOC), nitrogen oxides (NOx), carbon monoxide (CO), and particulate matters (PM2.5 and PM10) would be significant even after mitigation. The Draft PEIR states that the majority of the Proposed Project's operational emissions come from three primary operational sectors, including mobile sources, area sources, and energy sources. CEQA also 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.

Given the extent, scale and duration of the Proposed Project, the Lead Agency is recommended to evaluate the applicability of the statewide clean-fleet and clean-construction programs under development by the California Air Resources Board (CARB). These programs provide a framework for achieving substantial near-term reductions in NOx, VOC, and diesel particulate matter (DPM) emissions from on- and off-road fleets, which are the key precursors to the formation of ozone which have associated adverse health impacts. Taking full advantage of these programs would provide additional opportunities to minimize the significant effects from the Proposed Project.

CARB's California Clean Construction Program is designed to recognize and encourage off-road construction fleets that voluntarily exceed regulatory requirements by deploying cleaner-than-Tier 4 Final or zero-emission off-road equipment.[12] Similarly, CARB's Clean Fleet Connect[13] and Advanced Clean Fleets (ACF) programs support on-road fleet transitions toward zero-emission technologies.[14] These frameworks demonstrate that both construction and operational fleets can achieve meaningful emissions reductions through adoption of newer, cleaner equipment and zero-emission technologies. Draft PEIR does not fully examine the feasibility of applying these emerging statewide programs as mitigation in accordance with CEQA Guidelines Section 15126.4. These CARB programs provide substantial evidence that cleaner-than-baseline technologies are commercially emerging and will become increasingly feasible during the Proposed Project's multi-

[11] Bloomington Business Park Specific Plan Project. Court Ruling. p. 34 of PDF. Available at: https://www.climatecasechart.com/documents/california-superior-court-found-that-ceqa-review-for-industrial-rezoning-improperly-analyzed-greenhouse-gas-reduction-measures_4d86

[12] CARB – California Clean Construction Program. Available at: https://ww2.arb.ca.gov/our-work/programs/california-clean-construction-program.

[13] CARB – Clean Fleet Connect. Available at: https://ww2.arb.ca.gov/our-work/programs/clean-fleet-connect.

[14] CARB – Advanced Clean Fleets Program. Available at: https://ww2.arb.ca.gov/our-work/programs/advanced-clean-fleets.

year buildout. As such, their omission results in a lost opportunity to reduce the Proposed Project's significant air quality impacts.

Because NOx and VOC emissions from construction and operational activities are major contributors to regional ozone formation, implementation of clean-construction and clean-fleet measures could directly reduce the precursor emissions most relevant to potentially adverse health outcomes evaluated under *Sierra Club v. County of Fresno (Friant Ranch)*. These measures also complement any future Friant Ranch–type analysis by reducing the Proposed Project's emission inventory before photochemical or health-impact modeling is performed, thereby reducing any potential increases in regional pollutant concentrations.

Therefore, the Lead Agency is recommended to revise Draft PEIR to incorporate clean-fleet and clean-construction commitments into either the project description as part of a design feature or in mitigation measures, such as:

- Require the use of cleaner than Tier 4 Final or zero-emission off-road equipment when commercially available;
- Implement phased integration of zero-emission on-road trucks consistent with CARB's ACF implementation schedule or Clean Fleet Connect guidance over the lifetime of the Proposed Project;
- Establish contract specifications which require subcontractors to utilize clean construction equipment meeting CARB-recognized standards; and
- Require annual reporting or verification mechanisms to ensure compliance.

Incorporating these commitments would not only reduce NOx, VOC, and DPM emissions, but also align the Proposed Project with CARB's long-term clean-fleet transition strategy and California's climate mandates. Incorporating these commitments into the Final CEQA document would provide health-protective benefits to nearby sensitive receptors.

Inconsistency Between Project Components in Draft PEIR and Appendix B – Air Quality/Greenhouse Gas/Energy Data

In accordance with description of the Proposed Project's components outlined in the Draft PEIR[15], the Proposed Project is expected to include "Light and Heavy Industrial Land Use" totaling approximately 1,900 acres. It is important to note that the document does not currently specify the type of proposed structures under this land use category[16]; however, the Lead Agency defined the *Manufacturing* subtype for this land use acreage under CalEEMod analysis data in *Appendix B – Air Quality/Greenhouse Gas/Energy Data.*

According to the CalEEMod User Guide – Version 2022.1, it explicitly states the characteristics of *Manufacturing* subtype as: *"facilities where the primary activity is the conversion of raw materials or parts into finished products which generally also has office, warehouse, and R&D functions at the site".*[17] While this definitions covers warehouse applications as part of a

[15] Cabazon Infrastructure Plan and Cabazon Community Plan Project Draft PEIR, Pages 2-6 to 2-15.
[16] *Ibid*, Page 2-8, Table 2-1.
[17] CalEEMod User Guide – Version 2022.1, available at: https://www.caleemod.com/user-guide

manufacturing facility, the Draft PEIR does not specifically state whether the warehouse activities as pertained to mitigation measures AQ-5, AQ-6, and AQ-9 are expected to be part of a manufacturing facility or a standalone warehouse structure. Since the CalEEMod User Guide also list "Warehouse" as an *Industrial* subtype category, South Coast AQMD staff recommend that the Lead Agency correct the land use sub-type square footage used in CalEEMod modeling to ensure accuracy and compliance with guidelines.

Clarification on Potential Use of Railroad for Transportation Purposes

Based on an aerial photograph review, South Coast AQMD staff identified a railroad adjacent to the Proposed Project site in a west-east orientation. The CEQA document 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.

Air Quality Mitigation Measures for NOx and PM Emissions from Construction

Given the long-range plan of the Proposed Project, which is expected to expand over 30 years, Tier 4 technology may not be the cleanest technology when construction occurs later for individual projects. 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.[18] 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.

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 PEIR. 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[19] for both operational and construction emissions.

[18] Presentation is available 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

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

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.

   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 PEIR. 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.

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 PEIR:

1. State of California – Department of Justice: Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act[20]
2. South Coast AQMD 2022 Air Quality Management Plan,[21] 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
   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.[22]

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 PEIR should include a discussion about the potentially applicable South Coast AQMD rules that may be applicable to the Proposed Project. Those rules may include, for example, Rule 201 – Permit to Construct,[23] Rule 203 – Permit to Operate,[24] Rule 401 – Visible Emissions,[25] Rule 402 – Nuisance,[26] Rule 403 – Fugitive Dust,[27] Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,[28] Rule 1113 – Architectural Coatings,[29] Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil,[30] Rule 1179 – Publicly Owned Treatment Works Operations,[31] Regulation XIII – New Source Review,[32] Rule 1401 – New Source Review of Toxic Air Contaminants,[33] Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants,[34] Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines,[35] etc. It

[20] 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
[21] 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
[22] United States Environmental Protection Agency (U.S. EPA), Mobile Source Pollution - Environmental Justice and Transportation. Available at: https://www.epa.gov/mobile-source-pollution.
[23] South Coast AQMD, Rule 201 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf
[24] South Coast AQMD, Rule 203 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf
[25] South Coast AQMD, Rule 401 is available at: https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf
[26] South Coast AQMD, Rule 402 is available at: https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf
[27] South Coast AQMD, Rule 403 is available at: https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403
[28] South Coast AQMD, Rule 1110.2 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf
[29] South Coast AQMD, Rule 1113 is available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf
[30] South Coast AQMD, Rule 1166 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf
[31] South Coast AQMD, Rule 1179 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1179.pdf
[32] South Coast AQMD, Regulation XIII is available at: https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii
[33] South Coast AQMD, Rule 1401 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf
[34] South Coast AQMD, Rule 1466 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf
[35] South Coast AQMD, Rule 1470 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf

is important to note if 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 deciding 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. Therefore, 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 PEIR. 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 PEIR. 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 Zoya Banan, PhD., Air Quality Specialist, at ZBanan@aqmd.gov or me at SWang1@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

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SW:ZB

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