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SENT VIA E-MAIL:

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Draft Environmental Impact Report (EIR) for the San Jacinto Commerce Center Specific Plan Project (Proposed Project) (SCH No: 2024040114)

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to review the above-mentioned document. The City of San Jacinto 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 Draft EIR

Based on the Draft EIR, the Proposed Project consists of the development of approximately 514 acres on-site and approximately 146 acres off-site areas.¹ The Proposed Project seeks to: 1) replace the Village of San Jacinto Specific Plan (VSJSP); 2) change the General Plan Land Use and Zoning designation; 3) update the Zoning Ordinance; 4) subdivide the on-site area into 19 parcels; and 5) establish a Development Agreement.² The Proposed Project consists of multiple land uses including industrial, public, flex-use, open spaces, and overlay areas.³

Two scenarios are under consideration for implementing the Proposed Project:

- **Scenario 1:** Develop a maximum of nine million square feet (sf) intended for a variety of industrial uses without cold storage⁴, or
- **Scenario 2:** Develop a maximum of 6.9 million sf intended for a variety of industrial uses with 1.2 million sf of cold storage⁵

For both scenarios, Planning Area (PA) 7, which is designated as Flex-Use, could be developed with a maximum of 532 residential dwelling units instead of up to 1.5 million sf of industrial uses.⁶

¹ Draft EIR, p. 3-2.

² *Ibid.* p. 3-16.

³ *Ibid.* p. 3-17.

⁴ *Ibid.* p. 3-19.

⁵ *Ibid.* p. 3-20.

⁶ *Ibid.*

Based on the review of aerial imagery, the nearest sensitive receptor (e.g., residence) is approximately 200 feet to the east of the Proposed Project boundary. For both scenarios, construction is expected to begin in June 2027 and continue through April 2032.⁷

South Coast AQMD Comments

Potentially Underestimated Emissions

Section 5.3 (Air Quality) of the Draft EIR states that construction-related on-road emissions associated with hauling activities were estimated using the California Emissions Estimator Model (CalEEMod), based on the model's default one-way haul-trip distance of 20 miles.⁸ However, the Draft EIR does not provide substantial evidence or project-specific information to support the reliance on the 20-mile default distance to quantify emissions associated with the anticipated hauling activities to and from the project site.

Therefore, the Lead Agency is recommended to provide supporting documentation including but not limited to the one-way and round-trip distances between the intended waste disposal sites and the Proposed Project site and all other hauling locations to or from the Proposed Project site to determine if the default 20-mile one-way haul distance is representative of, the anticipated construction-related hauling activities and associated vehicle miles traveled (VMT). If project-specific information indicates that the anticipated haul trip distance would exceed 20 miles, the Lead Agency is recommended to revise the construction emissions analysis and recalculate the associated criteria pollutant emissions to reflect the actual haul-trip distances. The revised emissions calculations, assumptions, and supporting documentation should be incorporated into the Final EIR.

Underestimated Emissions and Health Risk from Truck Idling

Appendix B (Urban-B Health Risk Assessment) of the Draft EIR indicates that the Proposed Project is anticipated to involve a total of 4,352 and 3,760 two-way truck trips per day during operation for Scenarios 1 and 2, respectively⁹ and the analysis evaluated truck emissions as diesel particulate matter (DPM) by assuming that each truck will idle 15 minutes per day.¹⁰ However, as a practical matter, the actual truck idling duration may be much longer than what was assumed in the calculations because 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, relying on a 15-minute idling duration in the Draft EIR likely underestimated the actual on-site idling behavior and, consequently, the resulting 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

⁷ *Ibid.* p. 5.3-29.

⁸ *Ibid.* p. 5.3-34.

⁹ Appendix B. Urban-A. Air Quality Impact Analysis, p. 12.

¹⁰ Appendix B. Urban-A. Health Risk Assessment, p. 15.

100 feet from sensitive land uses such as homes and schools.¹¹ Furthermore, CARB's EMFAC2021 Volume III Technical Document (Table 4.4.2-5) indicates that heavy-duty trucks may idle for up to five hours at a single location under certain conditions.¹²

Accurate characterization of idling activity is essential to fully assess the potential health risk impacts, particularly for nearby sensitive receptors. Therefore, to ensure the air quality analysis of the anticipated truck idling activities is accurate, the Lead Agency is recommended to either: 1) revise the emission calculations from truck idling to more accurately reflect the actual conditions anticipated at the Proposed Project site for both scenarios by assuming a minimum of 30 minutes of idling per truck per day, unless site-specific data or operational constraints justify a different duration; or 2) provide empirical evidence, such as facility-specific queuing and processing time studies, vehicle circulation modeling, or comparable industry data, to support the 15-minute idling assumption as representative of expected operations of the Proposed Project. In addition, because the HRA relied on the emission estimates based on an underestimated truck idling assumption of 15 minutes, the HRA likely underestimated the full extent of operational health risks associated with the DPM emissions from the anticipated high volume of onsite heavy-duty truck activities. As such, the Lead Agency is also recommended to revise the HRA to reflect the updated DPM emissions from increasing the truck idling duration assumption and update the Final EIR accordingly.

Outdated AERMET and Meteorological Data in AERMOD Modeling

Based on the review of the AERMOD modeling files, the data from AERMET Version 9 was used in the analysis. However, South Coast AQMD released a newer, approved version of AERMOD-ready MET data files (Version 11) in October 2024.¹³ 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 20060.¹⁴ The U.S. EPA's current preferred and recommended meteorological data preprocessor for AERMOD is AERMET version 24142, which was released in November 2024.¹⁵

The use of outdated meteorological data for the analysis contained in the Draft EIR is inconsistent with the U.S. EPA's Guidelines on Air Quality Models (40 CFR Part 51, Appendix W)¹⁶ and likely resulted in inaccurate or underestimated health risk estimates. To ensure accuracy and consistency with federal modeling guidelines, the Lead Agency is recommended to re-run

¹¹ 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

¹² 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

¹³ South Coast AQMD AERMOD-Ready MET Data Files available at https://www.aqmd.gov/assets/aermet/AERMET_files_And_HRA_Tool.html

¹⁴ South Coast AQMD Data for AERMOD available at <https://www.aqmd.gov/home/air-quality/meteorological-data/data-foraermod>

¹⁵ U.S. EPA Air Quality Dispersion Modeling - Preferred and Recommended Models available at <https://www.epa.gov/scram/meteorological-processors-and-accessory-programs>

¹⁶ 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>

the air dispersion modeling using the more recent meteorological data processed by the most recent U.S. EPA-recommended versions of AERMET.

Potentially Underestimated Health Risk for Scenario 2

Appendix B (Urban-B Health Risk Assessment) of the Draft EIR presents the emission rates and modeling results used to estimate the cancer risk associated with operation of the Proposed Project. However, South Coast AQMD staff identified a discrepancy between the AERMOD modeling results and the concentration value relied upon to calculate the cancer risk for the sensitive receptor (i.e., the existing resident located at receptor R9) under Scenario 2. Specifically, the AERMOD modeling results indicate a concentration of 0.1233 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$), whereas the cancer risk calculation presented in Appendix B appears to be based on a concentration of 0.00822 $\mu\text{g}/\text{m}^3$. Use of the lower concentration in the analyses resulted in an underestimated calculated cancer risk for the residential receptor under Scenario 2.

Therefore, the Lead Agency is recommended to revise the cancer risk calculation for Scenario 2 to rely on the concentration of 0.1233 $\mu\text{g}/\text{m}^3$ from the AERMOD modeling results. The revised cancer risk calculation should be provided in the Final EIR, along with supporting documentation and calculations demonstrating the basis for the concentration used and confirming consistency with the AERMOD modeling results.

Incomplete Air Quality Impact Analysis of Overlapping Construction and Operation Activities

Appendix B (Urban-A Air Quality Impact Analysis) of the Draft EIR indicates that construction and operation activities may potentially overlap, and a summary of the mitigated total peak daily emissions during the overlap of construction and operation activities for both Scenarios 1 and 2 is included.¹⁷ However, the analysis of overlapping construction and operation activities is incomplete because the Draft EIR does not determine the level of significance relative to the overlapping construction and operation activities.

When construction and operation activities overlap, the combined daily emissions from the overlapping activities should be compared to the South Coast AQMD air quality significance thresholds for operation in order to determine whether the emissions would result in significant adverse air quality impacts. Therefore, the Lead Agency is recommended to complete the overlapping emissions analysis by comparing the combined daily emissions to the South Coast AQMD operational thresholds of significance and determine whether the resulting impacts are significant. During the overlapping construction and operation activities, if any pollutant exceeds the South Coast AQMD air quality significance thresholds for operation, then the analysis and supporting documentation in the Final EIR will need to be revised. In addition, all feasible mitigation measures to reduce or eliminate the significant impacts will need to be identified in the Final EIR.

¹⁷ Appendix B. Urban-A. Air Quality Impact Analysis. p. 62.

Recommendation to Implement CARB Guidance

To assist with identifying ways to minimize air quality impacts from the Proposed Project, the Lead Agency is recommended to consult and apply the guidance from the CARB Air Quality and Land Use Handbook: A Community Health Perspective,¹⁸ which is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. CARB has another helpful technical advisory, Strategy to Reduce Air Pollution Exposure Near High-Volume Roadways, which contains additional guidance on strategies to reduce air pollution exposure of Proposed Projects located near high-volume roadways.¹⁹

Consistency with Assembly Bill (AB) 98 Requirements

The Proposed Project would allow up to 532 residential dwelling units within PA 7 under both Scenario 1 and Scenario 2, and PA 7 would be surrounded by industrial uses within PAs 1, 2, and 3, primarily to the west and south. As a result, the proposed residential development would introduce new on-site sensitive receptors in close proximity to the proposed industrial and warehouse-related activities, which could expose future residents to potential air pollutant emissions associated with these uses.

Given the proximity of the proposed residential uses to industrial development, the Lead Agency is recommended to evaluate the applicability of the warehouse siting and design requirements established under AB 98, which are intended to reduce potential air quality and public health impacts associated with warehouse operations on nearby sensitive receptors. Among these requirements is a 300-foot setback between new or expanded high-cube warehouse loading bays and sensitive receptors. The Final EIR should identify whether the proposed industrial uses within PAs 1, 2, and 3 would be subject to these requirements and evaluate whether the proposed site plan and development standards provide the applicable separation from the residential uses proposed within PA 7.

The 300-foot setback reflects current State policy for reducing exposure to emissions associated with warehouse loading operations and is therefore relevant when evaluating feasible design alternatives under CEQA. Therefore, the Lead Agency is recommended to incorporate the applicable AB 98 requirements into the Specific Plan and development standards, rather than relying solely on future project-by-project review.

Because PA 7 may alternatively be developed with residential uses, the Final EIR should also evaluate whether the proposed land-use flexibility could result in future residential use being located substantially closer to warehouse loading areas, truck circulation areas, or other emission sources. The Final EIR should identify feasible design measures or development standards that would minimize potential exposure to future residents.

¹⁸ CARB's Air Quality and Land Use Handbook: A Community Health Perspective can be found at: <https://www.aqmd.gov/docs/default-source/ceqa/handbook/california-air-resources-board-air-quality-and-land-use-handbook-a-community-health-perspective.pdf>

¹⁹ CARB's Strategy to Reduce Air Pollution Exposure Near High-Volume Roadways, April 2017, available at: https://ww2.arb.ca.gov/sites/default/files/2017-10/rd_technical_advisory_final.pdf

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

The Draft EIR identifies significant air quality and greenhouse gas (GHG) impacts associated with construction and operation of the Proposed Project. To reduce these impacts, the Draft EIR includes 31 air quality mitigation measures (MMs). With implementation of the proposed MMs, construction-related air quality impacts would be reduced to less than significant, while operational air quality impacts would remain significant and unavoidable. 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 during construction, operation, and the overlap of the two, South Coast AQMD recommends incorporating the following mitigation measures and project design considerations into the Final EIR.

Mobile Sources

1. Require: a) zero-emissions (ZE) or near-zero emission (NZE) on-road haul trucks such as heavy-duty trucks with natural gas engines that meet CARB's adopted optional NOx emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr), if and when feasible; and b) a phase-in schedule to incentivize the use of these cleaner operating trucks.

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 Rule²⁰ and the Heavy-Duty Low NOx Omnibus Regulation,²¹ ZE and NZE trucks will become increasingly more available to use. South Coast AQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency.

2. Require the use of 2017 model year or newer, cleaner trucks, if ZE or NZE trucks are not feasible. All heavy-duty haul trucks should also meet CARB's lowest optional low-NOx standard.²² Include environmental analyses to evaluate and identify sufficient electricity and supportive infrastructure in the Energy and Utilities and Service Systems Sections in the CEQA document, where appropriate. Include the requirement in applicable bid documents, purchase orders, and contracts. Operators shall maintain records of all trucks associated with project construction to document that each truck used meets these emission standards, and make the records available for inspection. The Lead Agency should conduct regular inspections to the maximum extent feasible to ensure compliance.
3. Require that all applicable Medium-Heavy Duty Truck (MHDT), Heavy-Heavy Duty Truck (HHDT), and other on-road diesel-fueled heavy-duty vehicles subject to CARB Clean Idle requirements be equipped with engines that are certified by CARB to the

²⁰ CARB, June 25, 2020, Advanced Clean Trucks Rule, available at: <https://ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks>.

²¹ CARB has recently passed a variety of new regulations that require new, cleaner heavy-duty truck technology to be sold and used in state. For example, on August 27, 2020, CARB approved the Heavy-Duty Low NOx Omnibus Regulation, which will require all trucks to meet the adopted emission standard of 0.05 grams per brake horsepower-hour (g/bhp-hr) starting with engine model year 2024. Available at: <https://ww2.arb.ca.gov/rulemaking/2020/hdomnibuslownox>.

²² In 2013, CARB adopted optional low-NOx emission standards for on-road heavy-duty engines. CARB encourages engine manufacturers to introduce new technologies to reduce NOx emissions below the current mandatory on-road heavy-duty diesel engine emission standards for model-year 2010 and later. CARB's optional low-NOx emission standard is available at: <https://ww2.arb.ca.gov/our-work/programs/optionalreduced-nox-standards>

applicable Clean Idle standard and, where applicable, display the CARB-approved “Certified Clean Idle” label.²³

4. Limit the daily number of trucks allowed at the Proposed Project to the levels analyzed in the Final CEQA document. 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.
5. Provide electric vehicle (EV) charging stations or, at a minimum, provide electrical infrastructure and appropriately sized electrical panels to support EV charging. 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 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 Act²⁴

²³ CARB Idling Flyer available at: https://ww2.arb.ca.gov/sites/default/files/2022-06/Idling_Flyer_EN.pdf

²⁴ 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>

2. South Coast AQMD 2022 Air Quality Management Plan,²⁵ 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 Measures

3. United States Environmental Protection Agency (U.S. EPA): Mobile Source Pollution - Environmental Justice and Transportation.²⁶

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 NO_x and 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 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 development and could include up to 9 million sf of 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 obligation²⁷. 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.²⁸

²⁵ 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>

²⁶ United States Environmental Protection Agency (U.S. EPA), Mobile Source Pollution - Environmental Justice and Transportation. Available at: <https://www.epa.gov/mobile-source-pollution>.

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>.

South Coast AQMD Air Permits, Role as a Responsible Agency

Section 5.3 (Air Quality) of the Draft EIR assumes that the Proposed Project would include the installation of 11 75-horsepower (hp) diesel-fueled fire pumps and one 250 hp diesel-fueled backup generator.²⁹ Therefore, air permits from South Coast AQMD will be required. The Final EIR 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,³⁰ Rule 203 – Permit to Operate,³¹ Rule 401 – Visible Emissions,³² Rule 402 – Nuisance,³³ Rule 403 – Fugitive Dust,³⁴ Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,³⁵ Rule 1113 – Architectural Coatings,³⁶ Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil, Regulation XIII – New Source Review,³⁷ Rule 1401 – New Source Review of Toxic Air Contaminants,³⁸ Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants, Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines,³⁹ etc. Since air permits from South Coast AQMD will be required for the Proposed Project, the role of South Coast AQMD has changed from a Commenting Agency to a Responsible Agency under CEQA. In addition, the Lead Agency is required to consult with South Coast AQMD as a Responsible Agency per CEQA Guidelines Section 15086.

Thus, as set forth in CEQA Guidelines Section 15096, South Coast AQMD should be identified in the CEQA document as a Responsible Agency for the Proposed Project. Given the certainty that discretionary air permits will be required, early consultation is necessary to ensure that the CEQA document is sufficient for South Coast AQMD's use as a Responsible Agency and to avoid future procedural or legal barriers to permit issuance.

Conclusion

As set forth in Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a) and (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.

²⁹ Draft EIR. p. 5.3-38.

³⁰ South Coast AQMD, Rule 201 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>

³¹ South Coast AQMD, Rule 203 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>

³² South Coast AQMD, Rule 401 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf>

³³ South Coast AQMD, Rule 402 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>

³⁴ South Coast AQMD, Rule 403 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403>

³⁵ South Coast AQMD, Rule 1110.2 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf

³⁶ South Coast AQMD, Rule 1113 is available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf>

³⁷ South Coast AQMD, Regulation XIII is available at: <https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii>

³⁸ South Coast AQMD, Rule 1401 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf>

³⁹ South Coast AQMD, Rule 1470 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf>

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 or me at swang1@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

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