



# South Coast Air Quality Management District

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SENT VIA E-MAIL:

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## **Draft Environmental Impact Report (EIR) for the Proposed Oasis at Indio Project (Proposed Project) (SCH No. 2024050578)**

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

### South Coast AQMD Staff's Summary of Project Information in the Draft EIR

Based on the Draft EIR, the Proposed Project consists of construction and operation of residential, commercial, and industrial buildings on approximately 183 acres of currently vacant land in the City of Indio, Riverside County, California.<sup>1</sup> For the aforementioned Proposed Project to occur, the applicant is requesting, among other entitlements, approval of the Oasis at Indio Specific Plan (Specific Plan).<sup>2</sup> If approved, the Specific Plan will serve as a regulatory document for the entire Specific Plan area.<sup>3</sup> The Draft EIR analyzes two potential buildout scenarios for the Specific Plan as follows:<sup>4,5</sup>

1. Maximum Buildout Scenario (MBS) which includes:
  - a. 1,806,290 square feet (sq. ft) of industrial land use
  - b. 3,240 multi-family residential units
  - c. 20,000 sq. ft of commercial/retail use
2. Scenario #2 which includes:
  - a. 1,806,290 sq. ft of industrial land use
  - b. 1,237 multi-family residential units
  - c. 71,600 sq. ft of commercial land use, which, among other land uses, will include a 16-pump retail gasoline fueling station
  - d. 128-room hotel

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<sup>1</sup> Draft EIR for the Proposed Oasis at Indio Project (Draft EIR). Chapter 1 Executive Summary, p. 1-1.

<sup>2</sup> *Ibid.* p. 1-3.

<sup>3</sup> *Ibid.* p. 1-3.

<sup>4</sup> *Ibid.* p. 1-3.

<sup>5</sup> *Ibid.* Appendix B Air Quality and Health Risk Assessment MIG, Inc. (AQHRA), p. 2-14.

The 1,806,290 sq. ft of industrial land use would be identical under both scenarios and consist of two warehouse buildings with Building 1 developed as an 859,610 sq. ft building with 150 truck loading docks and Building 2 developed as a 946,680 sq. ft building with 170 truck loading docks.<sup>6</sup> Both warehouse buildings combined will generate approximately from 1,720 to 2,583 one-way truck trips per day.<sup>7,8</sup> The nearest sensitive receptors (single-family residences) are located approximately 650 feet north of the Proposed Project site.<sup>9</sup> Based on Staff's review of aerial photographs, the nearest off-site worker (a commercial plaza which includes a gasoline fueling station) is approximately 250 feet east of the Proposed Project site.<sup>10</sup> Construction is anticipated to commence in the 1<sup>st</sup> quarter of 2025, and conclude in the 4<sup>th</sup> quarter of 2033.<sup>11</sup> The Proposed Project site is located on the southwest corner of Avenue 42 and Monroe Street with the southern part of the site running adjacent to the Interstate 10 freeway.<sup>12</sup>

### South Coast AQMD Staff's Comments

#### *Inconsistency in Land Use Type and Truck Trip Generation for Operation Phase*

The Draft EIR states that for the industrial portion of the Proposed Project, truck trip generation has been calculated in accordance with the Institute of Transportation Engineers (ITE) Land Use codes:

- 155 – High Cube Fulfillment Center Warehouse (Non-Sort); and
- 155 – High Cube Fulfillment Center Warehouse (Sort)<sup>13</sup>

Each warehouse building was classified as either land use subcategory *Sort* or *Non-Sort*, which results in a total of **1,720** daily one-way truck trips.<sup>14</sup> In Appendix L.1 - TIA Appendix\_2023-5-15, however, both industrial buildings were categorized under the land use subcategory of *Sort*, which results in a total of **2,583** daily one-way truck trips.<sup>15</sup> The calculations of air emissions for the Proposed Project were modeled using CalEEMod by relying on 1,720 truck trips, which resulted in lower estimated air emissions than if 2,583 truck trips were relied upon.<sup>16</sup> For context, Figures 1 and 2 provide screenshots from the Draft EIR which illustrate the substantial difference in the number of potential trips that would be generated from these two different land use subcategories.

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<sup>6</sup> *Ibid.* Appendix L.2 VMT Memo, p. 17.

<sup>7</sup> *Ibid.* Appendix L.2 – VMT Memo, p. 10 and 17.

<sup>8</sup> *Ibid.* Appendix L.1 - TIA Appendix\_2023-5-16, PDF p. 8 of 2141.

<sup>9</sup> *Ibid.* Chapter 4 Air Quality, p. 4.3-7.

<sup>10</sup> *Ibid.* Chapter 3 Project Description, p. 3-1.

<sup>11</sup> *Ibid.* Chapter 4. Air Quality, p. 4.3-24,4.3-25, and 4.3-32.

<sup>12</sup> *Ibid.* Chapter 1.0 Executive Summary, p. 1-1.

<sup>13</sup> *Ibid.* 4 Transportation, p. 4.16-17.

<sup>14</sup> *Ibid.* Appendix L.2 – VMT Memo, PDF p. 11 and 29.

<sup>15</sup> *Ibid.* Appendix L.1 - TIA Appendix\_2023-5-16, PDF p. 8 of 2141.

<sup>16</sup> *Ibid.* Appendix B AQHRA: Appendix A – Construction and Operational Emissions Estimates. CalEEMod Oasis at Indio Maximum Buildout Scenario Operations Custom Report, p. 38 of 46.

PROJECT OPTION A TRIP GENERATION FORECAST

ITE Land Use Code / Project Description	Daily 2-Way	AM Peak Hour			PM Peak Hour		
		Enter	Exit	Total	Enter	Exit	Total
<i>Proposed Project Generation Forecast:</i>							
▪ Building 1 High Cube Fulfillment Center Warehouse (Non-Sort) (859,610 SF)							
<input type="checkbox"/> Passenger Cars	1,410	103	26	129	52	86	138
<input type="checkbox"/> 2 Axle Trucks	39	0	0	0	0	0	0
<input type="checkbox"/> 3 Axle Trucks	69	0	0	0	0	0	0
<input type="checkbox"/> 4+ Axle Trucks	258	0	0	0	0	0	0
<i>Building 1 High Cube Fulfillment Center (Non-Sort) Total</i>	1,776	103	26	129	52	86	138
▪ Building 2 High Cube Fulfillment Center Warehouse (Sort) (946,680 SF)							
<input type="checkbox"/> Passenger Cars	5,557	644	161	805	445	682	1,127
<input type="checkbox"/> 2 Axle Trucks	142	0	0	0	0	0	0
<input type="checkbox"/> 3 Axle Trucks	246	19	0	19	0	0	0
<input type="checkbox"/> 4+ Axle Trucks	966	28	0	28	0	28	28
<i>Building 2 High Cube Fulfillment Center (Sort) Total</i>	6,911	691	161	852	445	710	1,155
▪ Multifamily Housing (3,240 DU)	21,838	311	985	1,296	1,041	611	1,652
▪ Retail (20,000 SF)	1,089	28	19	47	66	66	132
Pass-by Trips (Daily: 10%; AM: 10%; PM: 40%) <sup>1</sup>	-109	-3	-2	-5	-26	-27	-53
<i>Retail Subtotal</i>	980	25	17	42	40	39	79
<b>Total Project Option A Trip Generation</b>	<b>31,505</b>	<b>1,130</b>	<b>1,189</b>	<b>2,319</b>	<b>1,578</b>	<b>1,446</b>	<b>3,024</b>

Figure 1: Screenshot from Appendix L.2 – VMT Memo, p. 10. MBS Scenario. Land use (LU) subcategory and truck trips have been highlighted in yellow (39 + 69 + 258 + 142 + 246 + 966 = 1,720 truck trips/day)

**PROJECT TRIP GENERATION FORECAST  
BH PROPERTIES INDUSTRIAL AND COMMERCIAL PROJECT, INDIO**

ITE Land Use Code / Project Description	Daily 2-Way	AM Peak Hour			PM Peak Hour		
		Enter	Exit	Total	Enter	Exit	Total
<i>Proposed Project Generation Forecast:</i>							
▪ Building 1 High Cube Fulfillment Center Warehouse (Sort) (859,610 SF)							
<input type="checkbox"/> Passenger Cars	5,046	585	146	731	404	619	1,023
<input type="checkbox"/> 2 Axle Trucks	129	0	0	0	0	0	0
<input type="checkbox"/> 3 Axle Trucks	223	17	0	17	0	0	0
<input type="checkbox"/> 4+ Axle Trucks	877	26	0	26	0	26	26
<i>Building 1 High Cube Fulfillment Center (Sort)         Total</i>	6,275	628	146	774	404	645	1,049
▪ Building 2 High Cube Fulfillment Center Warehouse (Sort) (946,680 SF)							
<input type="checkbox"/> Passenger Cars	5,557	644	161	805	445	682	1,127
<input type="checkbox"/> 2 Axle Trucks	142	0	0	0	0	0	0
<input type="checkbox"/> 3 Axle Trucks	246	19	0	19	0	0	0
<input type="checkbox"/> 4+ Axle Trucks	966	28	0	28	0	28	28
<i>Building 2 High Cube Fulfillment Center (Sort)         Total</i>	6,911	691	161	852	445	710	1,155
▪ Multifamily Housing (3,200 DU)	21,568	307	973	1,280	1,028	604	1,632
▪ Retail (20,000 SF)	1,089	28	19	47	66	66	132
Pass-by Trips (Daily: 10%; AM: 10%; PM: 40%) <sup>3</sup>	-109	-3	-2	-5	-26	-27	-53
<i>Retail Subtotal</i>	980	25	17	42	40	39	79
<b>Total Net Trip Generation</b>	<b>35,734</b>	<b>1,651</b>	<b>1,297</b>	<b>2,948</b>	<b>1,917</b>	<b>1,998</b>	<b>3,915</b>

**Figure 2: Screenshot from Appendix L.1 - TIA Appendix\_2023-5-16, PDF p. 8. MBS Scenario. LU subcategory and truck trips have been highlighted in yellow (129 + 223 + 877 + 142 + 246 + 966 = 2,583 truck trips/day)**

The Proposed Project daily trip generation values presented in the Draft EIR, Appendix B AQHRA, Appendix L.2 – VMT Memo, and Appendix L.1 – TIA 0\_2024-05-16 are widely different from the daily trip generation values presented in Appendix L.1 - TIA Appendix\_2023-5-16. This discrepancy affects operational emissions and health risk assessment (HRA) results. Due to the large difference in these truck trip numbers, Staff recommends the Lead Agency make the following revisions in the air quality analysis: 1) identify and consistently apply the correct land use type in the truck trip generation calculations; 2) re-evaluate the operational emissions associated with those trucks in the air quality and HRA analysis; and 3) update all the corresponding appendices and include the updated information in the Final EIR.

*Potential Underestimation of Operational Emissions Due to Inaccurate Truck Trip Length Assumptions*

The Draft EIR explains that the operational air quality impact analysis assumed that the average truck trip length is 32.2 miles.<sup>17</sup> The Proposed Project site, however, is located approximately

<sup>17</sup> *Ibid.* 4 Greenhouse Gas Assumptions, p. 4.18-19.

135 miles from the Ports of Long Beach and Los Angeles (Ports), which means that the air quality analysis underestimated the emissions from trucks traveling from the Ports to the Proposed Project site. For this reason, Staff recommends the Lead Agency revise the calculations in the Final EIR by taking a project-specific approach to vehicle trip lengths by applying more conservative trip lengths such as designating 135 miles for Port-related trips. Tailoring these parameters and assumptions based on project-specific data will ensure a more accurate assessment of emissions, accounting for the unique circumstances and logistical realities of the Proposed Project.

*Use of South Coast AQMD's Mass Rate Localized Significance Threshold (LST) Look-Up Table to Analyze the Proposed Project's Localized Air Quality Impact is not Consistent with Guidance for the LST Methodology*

The Proposed Project covers approximately 183 acres and the Draft EIR explains that during construction, 10 to 49 acres per day could be actively disturbed.<sup>18</sup> The Lead Agency relied on South Coast AQMD's Mass Rate LST Look-up Table for five acres as the screening parameter to determine if the Proposed Project's construction and operational daily emissions of NO<sub>x</sub>, CO, PM<sub>10</sub> and PM<sub>2.5</sub> could result in a significant impact to local air quality.<sup>19</sup> South Coast AQMD staff, however, developed the LST methodology for proposed projects that are less than or equal to five acres.<sup>20</sup> For projects that are greater than five acres in size, South Coast AQMD recommends lead agencies perform project-specific air dispersion modeling to determine operational localized air quality impacts. For construction, if project sites are greater than five acres in size and disturb more than five acres/day during the construction phase, Staff also recommends lead agencies perform project-specific air dispersion modeling to determine construction localized air quality impacts. Staff therefore recommends the Lead Agency to: 1) perform project-specific air dispersion modeling for the Proposed Project's construction and operational phase emissions to determine localized air quality impacts; and 2) include the results in the Final EIR.

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

CEQA requires all feasible mitigation measures that go beyond what is required by law to be applied as a means to minimize or eliminate any significant adverse air quality impacts. The air quality analysis for the Proposed Project concluded that construction emissions from both the MBS Scenario and Scenario #2 could exceed South Coast AQMD's air quality significance mass daily threshold for volatile organic compounds (VOC) even after mitigation measures (MM) AIR-1 – Reduce Construction VOC Emissions, and AIR-2 – Reduce Construction Oxides of Nitrogen and Particulate Matter Exhaust Emissions, are applied.<sup>21,22</sup> The air quality analysis also concluded that operation emissions for VOC, oxides of nitrogen (NO<sub>x</sub>), carbon monoxide (CO),

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<sup>18</sup> *Ibid.* 4 Air Quality, p. 4.3-52.

<sup>19</sup> South Coast AQMD Appendix C – Mass Rate LST Look-up Table. Access here: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-lst-look-up-tables.pdf>

<sup>20</sup> Final LST Methodology, July 2008. Page 1-1, 3-3, & 3-4. Access here: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf>

<sup>21</sup> Draft EIR. 4 Air Quality, p. 4.3-76.

<sup>22</sup> *Ibid.* 1 Executive Summary, p. 1-12 to 1-17.

particulate matter 10 (PM10), and particular matter 2.5 (PM2.5) could also exceed South Coast AQMD's air quality significance thresholds even after the following mitigation measures are applied:<sup>23, 24</sup>

- AIR-3 – Reduce Landscaping Equipment Emissions;
- AIR-4 – Reduce Residential Vehicle Trip Emissions;
- AIR-5 – Reduce Commercial and Industrial Light-duty Vehicle Trip Emissions;
- AIR-6 – Reduce Commercial and Industrial Truck Trip Emissions; and
- AIR-7 – Reduce Commercial and Industrial Yard Equipment Emissions.

In addition, the greenhouse gas (GHG) emissions analysis concluded that after implementation of MM GHG-1 – Reduce Appliance Energy Consumption and GHG Emissions, GHG-2 – Maximize Solar Roof Access Area, and GHG-3 – Reduce Building Energy Consumption and GHG Emissions, the GHG emissions could also remain potentially significant and unavoidable for both the MBS Scenario and Scenario #2.<sup>25</sup> To further reduce the Proposed Project's air quality and GHG impacts, South Coast AQMD recommends incorporating the following mitigation measures and project design considerations into the Final EIR.

#### 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 is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency.

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

#### Other Area Sources

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<sup>23</sup> Draft EIR. 4 Air Quality, p. 4.3-77.

<sup>24</sup> *Ibid.* 1 Executive Summary, p. 1-10 and 1-11.

<sup>25</sup> *Ibid.* 4 Greenhouse Gas Emissions, p. 4.8-36 to 4.8-38.

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<sup>26</sup>
2. South Coast AQMD 2022 Air Quality Management Plan,<sup>27</sup> 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<sup>28</sup>

#### *Emission Reductions from Health Risk Strategies*

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<sup>26</sup> 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>

<sup>27</sup> 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>

<sup>28</sup> U.S. EPA, Mobile Source Pollution - Environmental Justice and Transportation. Available at: <https://www.epa.gov/mobile-source-pollution/environmental-justice-and-transportation>

South Coast AQMD is concerned about the potential public health impacts of siting existing and new sensitive populations within the proximity of existing air pollution sources (e.g., freeway, railroad). For this reason, prior to approving this Proposed Project as well as any future development projects, the Lead Agency is recommended to consider the impacts of air pollutants on people who will live in the new project area and provide effective mitigation. Furthermore, in addition to the California Air Resources Board (CARB) Air Quality and Land Use Handbook already mentioned in the Draft EIR (which provides criteria for evaluating and reducing air pollution impacts associated with new projects involving land use decisions), South Coast AQMD also suggests that the Lead Agency review and apply the guidance provided in CARB's technical advisory which contains strategies to reduce air pollution exposure near high-volume roadways.<sup>29,30</sup>

Many strategies are available for residential receptors to reduce being exposed to particulate matter, including, but not limited to, Heating, ventilation, and air conditioning (HVAC) systems equipped with filters rated at a minimum efficiency reporting value (MERV) 13 or higher air filtration capabilities (or in some cases, MERV 15 or better is recommended), building design, orientation, location, vegetation barriers, landscaping screening, etc. Enhanced filtration units are capable of reducing exposure. Enhanced filtration systems, however, have limitations. For example, filters rated MERV 13 or higher are able to screen out greater than or equal to 50% of DPM but they have no ability to filter out VOC emissions.<sup>31</sup> Also, in a study that South Coast AQMD conducted to investigate filters rated at MERV 13 or better in classrooms, a cost burden is expected to be within the range of \$120 to \$240 per year to replace each filter panel.<sup>32</sup> The initial start-up cost could substantially increase if an HVAC system needs to be installed and if standalone filter units are required. Installation costs may vary, including costs for conducting site assessments and obtaining permits and approvals before filters can be installed. Other costs may include filter life monitoring, annual maintenance, and training for conducting maintenance and reporting. In addition, the filters would not have any effect unless the HVAC system is running. Therefore, when in use, the increased energy consumption from each HVAC system should be evaluated in the Draft EIR. While the filters operate 100 percent of the time when the HVAC is in use while the residents are indoors, the environmental analysis does not generally account for the times when the residents are not using their HVAC and instead have their windows or doors open or are moving throughout the common space outdoor areas of the Proposed Project. Furthermore, when used filters are replaced with new filters, emissions associated with trucks delivering the new filters and waste disposal trucks transporting the used filters to disposal sites should be evaluated in the Draft EIR. Therefore, any presumed effectiveness and feasibility of a particular HVAC filter should be carefully evaluated in more detail based on supporting evidence before assuming they will sufficiently alleviate exposure to DPM emissions.

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<sup>29</sup> Draft EIR, 4 Air Quality, p. 4.3-12.

<sup>30</sup> CARB's Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways. Available at: [https://ww2.arb.ca.gov/sites/default/files/2017-10/rd\\_technical\\_advisory\\_final.pdf](https://ww2.arb.ca.gov/sites/default/files/2017-10/rd_technical_advisory_final.pdf)

<sup>31</sup> This study evaluated filters rated MERV 13 or better. Accessed at: <http://www.aqd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf>. Also see 2012 Peer Review Journal article by South Coast AQMD: <https://onlinelibrary.wiley.com/doi/10.1111/ina.12013>.

<sup>32</sup> South Coast AQMD, Draft Pilot Study of High-Performance Air Filtration for Classroom Applications, October 2009. Available at: <https://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf>.



### *South Coast AQMD Air Permits and Role as a Responsible Agency*

The Draft EIR states that the Proposed Project may be required to obtain permits from the South Coast AQMD to “construct/permit to operate all stationary sources.”<sup>33</sup> The Draft EIR also states that stationary sources could include “commercial or industrial equipment such as large boilers, restaurant charbroilers, emergency generators, and fuel storage, transfer, and dispensing equipment.”<sup>34</sup> The final CEQA document should include a discussion about the potentially applicable South Coast AQMD rules that the Proposed Project needs to comply with. Those rules may include, for example, Rule 201 – Permit to Construct, Rule 202 – Temporary Permit to Operate, Rule 203 – Permit to Operate, Rule 403 – Fugitive Dust, Rule 403.1 – Supplemental Fugitive Dust Control Requirements for Coachella Valley Sources, Rule 461 – Gasoline Transfer and Dispensing, Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines, Rule 1113 – Architectural Coating, Rule 1401 – New Source Review of Toxic Air Contaminants, etc.<sup>35, 36, 37, 38, 39, 40, 41, 42, 43</sup>

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, spray booths, etc., air permits from South Coast AQMD will be required and the role of South Coast AQMD would change from a Commenting Agency to a Responsible Agency under CEQA. In addition, if South Coast AQMD is identified as a Responsible Agency, per CEQA Guidelines Sections 15086, the Lead Agency is required to consult with South Coast AQMD. CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of evaluating the applications for air permits. For these reasons, the Final EIR should include a discussion about any new stationary and portable equipment requiring South Coast AQMD air permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project.

The Final EIR should also include calculations and analyses for construction and operation emissions for the new stationary and portable sources, as this information will also 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: <http://www.aqmd.gov/home/permits>.

### Conclusion

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<sup>33</sup> Draft EIR. 3 Project Description, p. 3-31.

<sup>34</sup> *Ibid.* Appendix B AQHRA, p. 4-6.

<sup>35</sup> South Coast AQMD. Rule 201 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>

<sup>36</sup> *Ibid.* Rule 202 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-202.pdf>

<sup>37</sup> *Ibid.* Rule 203 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>

<sup>38</sup> *Ibid.* Rule 403 available at <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf>

<sup>39</sup> *Ibid.* Rule 403.1 available at <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403-1.pdf>

<sup>40</sup> *Ibid.* Rule 461 available at <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-461.pdf>

<sup>41</sup> *Ibid.* Rule 1110.2 available at [https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110\\_2.pdf](https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf)

<sup>42</sup> *Ibid.* Rule 1113 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf>

<sup>43</sup> *Ibid.* Rule 1401 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf>

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

Thank you for the opportunity to provide comments. South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Evelyn Aguilar, Air Quality Specialist, at [eaguilar@aqmd.gov](mailto:eaguilar@aqmd.gov) should you have any questions.

Sincerely,

*Sam Wang*

Sam Wang

Program Supervisor, CEQA IGR

Planning, Rule Development & Implementation

BR:DN:EA  
RVC240627-01  
Control Number