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Draft Environmental Impact Report (Draft EIR) for the Proposed Olive View-UCLA Medical Center Campus Master Plan (SCH No.: 2016031090

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final EIR.

South Coast AQMD Staff's Summary of Project Description

The Lead Agency proposes to develop guidelines, policies, and programs to guide campus development with a net increase in building footprint totaling 1.3 million square feet over a period of 20-plus years (Proposed Project). The Proposed Project is located at 14445 Olive View Drive on the northeast corner of Kennedy Road and Olive View Drive in the community of Sylmar within the City of Los Angeles. Although the exact construction schedule is unknown at the time of public review of the Draft EIR, it is anticipated that construction would begin as early as 2020 and occur beyond a planning horizon of 2035[1]. The Proposed Project will be broken up into two development phases, Tier I and Tier II. Tier I development phase is further broken into two sub-phases: Tier IA and Tier IB, and will occur over the next 17 years through 2035. Tier II development phase will occur beyond 2035[2]. The Proposed Project will become operational as early as 2021[3].

South Coast AQMD Staff's Summary of Air Quality Analysis

In the Air Quality Analysis, the Lead Agency quantified the Proposed Project's construction and operational emissions from development sub-phases Tiers IA and IB and compared those emissions to South Coast AQMD's recommended regional and localized air quality CEQA significance thresholds. Based on the analyses, the Lead Agency found construction and operational air quality impacts from Tier IA would be less than significant[4]. Additionally, the Lead Agency found that NOx emissions from Tier IB development phase would be slightly below South Coast AQMD's CEQA air quality significance threshold for NOx emissions during construction[5] at 98 pounds per day (lbs/day)[6]. With the implementation of Mitigation Measure (MM)-AQ-1, which requires low-VOC coatings with a VOC content of 25 grams per liter or less[7], Tier IB-related construction air quality impacts were found to be

1 Draft EIR. Section 3.2 Air Quality. Pages 3.2-12 through 3.2-14.
2 *Ibid*. Executive Summary. Page ES-6.
3 *Ibid.*
4 *Ibid.* Section 3.2 Air Quality. Page 3.2-21.
5 South Coast AQMD CEQA Significance Thresholds. Accessed at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf
6 Draft EIR. Section 3.2 Air Quality. Page 3.2-23.
7 *Ibid.*

less than significant[8]. Additionally, the Lead Agency found that Tier IB operational air quality impacts would be less than significant[9].

The Lead Agency did not quantify construction or operational emissions from Tier II development phase. Because details are unknown, emissions from construction and operation cannot quantified[10]; however, development projects under Tier II development phase would undergo project-specific CEQA review. Since "[…] it cannot be stated with certainty that emissions would be below applicable regional or localized emissions thresholds […]", the Lead Agency found that air quality impacts from Tier II development phase would be significant and unavoidable[11]. To mitigate these impacts, the Lead Agency has committed to MMs AQ-2 and AQ-3, which require projects that exceed regional and/or localized thresholds to implement construction[12] and operational[13] mitigation measures such as Tier 4 construction equipment, 2010 model year haul trucks, and preferential parking for clean air vehicles[14]. Additionally, to reduce the Proposed Project's greenhouse gas emissions, the Lead Agency has committed to MM-GHG-1, which includes, but is not limited to, requiring the use of Energy Star appliances, electric powered landscaping equipment, and equipping five percent of new parking spaces with electric vehicle charging infrastructure[15]. The Lead Agency also included a discussion of South Coast AQMD Rules applicable to the Proposed Project[16], such as Rule 403 – Fugitive Dust[17] and 403(e) – Additional Requirements for Large Operations[18], and Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines[19].

South Coast AQMD's 2016 Air Quality Management Plan

On March 3, 2017, South Coast AQMD's Governing Board adopted the 2016 AQMP[20], which was later approved by the California Air Resources Board (CARB) on March 23, 2017. Built upon the progress in implementing the 2007 and 2012 AQMPs, the 2016 AQMP provides a regional perspective on air quality and the challenges facing the South Coast Air Basin. The most significant air quality challenge in the Basin is to achieve an additional 45 percent reduction in nitrogen oxide (NOx) emissions in 2023 and an additional 55 percent NOx reduction beyond 2031 levels for ozone attainment.

South Coast AQMD Staff's General Comments

South Coast AQMD staff has comments on the Air Quality Analysis. While information on the Proposed Project's development potential at buildout from Tier II development is available (e.g., 1.3 million square feet of future development)[21], the Lead Agency did not use this information to quantify regional or localized construction or operational emissions from the implementation of Tier II development phase. Additionally, the Lead Agency did not analyze a scenario where construction activities overlap with operational activities (e.g., some components of Tier IA may be operational while some components of

[8] Draft EIR. Section 3.2 Air Quality. Pages 3.2-21 through 3.2-22.
[9] *Ibid*.
[10] *Ibid*. Pages 3.2-21 through 3.2-26.
[11] *Ibid*. Page 3.2-31.
[12] *Ibid*. Pages 3.2-30 through 3.2-31.
[13] *Ibid*. Pages 3.2-23 through 3.2-27.
[14] *Ibid*.
[15] *Ibid*. Section 3.7 Greenhouse Gas Emissions. Pages 3.7-23 through 3.7-24.
[16] *Ibid*. Section 3.2 Air Quality. Pages 3.2-4 through 3.2-5.
[17] South Coast AQMD. Rule 403 – Fugitive Dust. Accessed at: http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf.
[18] South Coast AQMD. Compliance and Enforcement Staff's contact information for Rule 403(e) Large Operations is (909) 396-2608 or by e-mail at dustcontrol@aqmd.gov.
[19] South Coast AQMD. Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines. Accessed at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf.
[20] South Coast AQMD. March 3, 2017. *2016 Air Quality Management Plan*. Accessed at: http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan.
[21] Draft EIR. Section 2 Project Description. Page 2-5.

Tier IB are under construction). South Coast AQMD staff is also concerned about the Lead Agency's finding that the Proposed Project is consistent with the 2016 AQMP when the Lead Agency found that the Proposed Project would result in significant and unavoidable air quality impacts. Please see the attachment for more information.

As described in the 2016 AQMP, achieving NOx emissions reductions in a timely manner is critical to attaining the National Ambient Air Quality Standard (NAAQS) for ozone before the 2023 and 2031 deadlines. South Coast AQMD is committed to attaining the ozone NAAQS as expeditiously as practicable. To further reduce the Proposed Project's construction and operational criteria pollutants emissions and to facilitate implementation the goals of the 2016 AQMP, South Coast AQMD staff recommends additional mitigation measures, including a commitment to periodic technology review, which the Lead Agency should review for incorporation in the Final EIR. Please see the attachment for more information. The attachment also includes comments on South Coast AQMD rules and regulations.

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), South Coast AQMD staff requests that the Lead Agency provide South Coast AQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and to the public who are interested in the Proposed Project. Further, when the Lead Agency makes the finding that the additional recommended mitigation measures are not feasible, the Lead Agency should describe the specific reasons for rejecting them in the Final EIR (CEQA Guidelines Section 15091).

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 Alina Mullins, Assistant Air Quality Specialist, at amullins@aqmd.gov or (909) 396-2402, should you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources

Attachment
LS:AM
LAC190528-02
Control Number

ATTACHMENT

Air Quality Impact Analysis for Tier II Development Phase

1. The Lead Agency did not quantify the Proposed Project's construction or operational emissions from Tier II development phase in the Draft EIR. The Lead Agency stated that "[t]ier II would involve the development of [a] new hospital, research and development, retail, and utility plant land uses predominantly on the western portion of the campus, as well as the demolition of some existing uses at the site". However, because "details about Tier II are unknown" emissions associated with construction and operational activities have not been quantified[22].

   When specific development is reasonably foreseeable as a result of the goals, policies, and guidelines in the Proposed Project, the Lead Agency should identify any potential adverse air quality impacts and sources of air pollution that could occur using its best efforts to find out and a good-faith effort at full disclosure in the EIR. The degree of specificity will correspond to the degree of specificity involved in the underlying activity which is described in the EIR (CEQA Guidelines Section 15146). When quantifying air quality emissions, emissions from both construction (including demolition, if any) and operations should be calculated. Preparing the CEQA analysis "necessarily involves some degree of forecasting. While foreseeing the unforeseeable is not possible, an agency must use its best efforts to find out and disclose all that it reasonably can" (CEQA Guideline Section 15144).

   Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be also be included in the operational analysis.

   When the precise construction schedule or operational scenario are unknown, the Lead Agency should use its best efforts to identify and quantify a worst-case construction and operational impact scenario that is reasonably foreseeable at the time the Draft EIR is prepared. As discussed in Section 2.4.2.2 "Tier II Development" in the Draft EIR, the Lead Agency has identified the estimated development potential of Tier II of the Proposed Project. For example, the Lead Agency discussed that the Master Plan Tier II development proposes "a new 600,000-square-foot inpatient hospital, two 120,000-square-foot research and development buildings, a 135,000-square-foot long-term care facility, 40,000 square feet of retail uses, and 1,837 parking spaces[23]. Therefore, the Lead Agency can and should use this information to forecast and develop potential construction and operational scenarios to implement the full buildout of Tier II development phase, quantify associated construction emissions, including emissions from any demolition activities, and operational emissions, and compare the emissions to the respective South Coast AQMD's air quality CEQA significance thresholds to determine the level of significance. The Lead Agency should use the most current version of California Emission Estimator Model (CalEEMod)[24] to quantify construction and operational emissions. While this recommendation may not change the Lead Agency's finding that the Proposed Project's construction and operational air quality impacts from Tier II development phase would be significant and unavoidable[25], a quantitative analysis will facilitate the goal and purpose of CEQA on public disclosure with useful information on the kind, size, scope, intensity,

[22] Draft EIR. Section 3.2 Air Quality. Page 3.2-23.
[23] *Ibid*. Section 2 Project Description. Pages 2-18 through 2-20.
[24] South Coast AQMD. CalEEMod Version 2016.3.2. Accessed at: http://www.aqmd.gov/caleemod/download-model.
[25] Draft EIR. Section 3.2 Air Quality. Pages 3.2-30 through 3.2-31.

duration, density, and location of subsequent project-level development to foster meaningful public participation and informed decision making.

Air Quality Impact Analysis – Overlapping Construction and Operational Activities

2. Based on a review of the Air Quality Analysis, South Coast AQMD staff found that the Lead Agency did not consider nor analyze a scenario where construction activities overlap with operational activities (e.g., some components of Tier IA may be operational while some components of Tier IB are under construction). Since implementation of the Proposed Project is expected to occur in phases and sub-phases over a multi-year timeframe of 20-plus years from 2019 to beyond 2035[26], it is reasonably foreseeable that construction and operation of various development components may overlap. If an overlapping construction and operation scenario is reasonably foreseeable, to conservatively analyze a worst-case impact scenario, South Coast AQMD staff recommends that the Lead Agency use its best efforts to identify the overlapping construction and operational years and development components, combine construction emissions (including emissions from demolition) with operational emissions, and compare the combined emissions to South Coast AQMD's air quality CEQA *operational* thresholds of significance to determine the level of significance in the Final EIR, unless the Lead Agency includes requirement(s) that will prohibit overlapping construction and operational activities.

Air Quality Analysis – Localized Significance Thresholds (LSTs) Analysis

3. The Proposed Project is surrounded by sensitive receptors[27]. South Coast AQMD staff recommends that the Lead Agency use its best efforts, based on already available Proposed Project development potential information, such as the estimated square footage of future facilities discussed in Section 2.4.2.2[28], to quantify and disclose the Proposed Project's localized emissions from Tier II development phase in the Final EIR. South Coast AQMD guidance for performing a localized air quality analysis is available on South Coast AQMD website[29]. Alternatively, the Lead Agency should consider to include a new air quality mitigation measure on project-level LSTs analysis to provide guidance and set requirements for subsequent projects under Tier II development phase. Please see Comment No. 5 for more information.

Consistency Analysis with South Coast AQMD's 2016 AQMP

4. Section 15125(d) of the CEQA Guidelines requires that EIRs analyze and discuss any inconsistencies between a proposed project and applicable general plans, specific plans, and regional plans. For example, a discussion of consistency between a regionally applicable AQMP and a proposed project helps identify if a proposed project is inconsistent with the assumptions and objectives that were taken into consideration for the development of the AQMP, and thus would interfere with the region's ability to comply with federal and state air quality standards and achieve attainment deadlines. If an inconsistency is found, lead agencies should consider ways to mitigate or eliminate the inconsistency so that there is no interference with regional air quality objectives.

   In the Draft EIR, the Lead Agency analyzed the Proposed Project's consistency with the 2016 AQMP and found that because the Proposed Project would be consistent with the relevant plans and regional planning documents, the Proposed Project would be consistent with the AQMP[30]. South Coast AQMD staff is concerned the Lead Agency's consistency analysis. First, construction activities from Tier II development phase were not quantified and were subsequently found to have significant and

[26] Draft EIR. Section 3.2 Air Quality. Pages 3.2-12 through 3.2-14.
[27] *Ibid.* Page 3.2-11.
[28] Draft EIR. Section 2 Project Description. Pages 2-18 through 2-20.
[29] South Coast AQMD. Localized Significance Thresholds. Accessed at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds.
[30] Draft EIR. Section 3.2 Air Quality. Pages 3.2-19 through 3.2-20.

unavoidable air quality impacts. Second, as discussed in Comment No. 2, the Proposed Project's air quality impacts from overlapping construction and operational activities were not analyzed and could potentially be significant and unavoidable after comparing the combined emissions from overlapping activities to South Coast AQMD's air quality CEQA significance thresholds for operation. Given these reasons, the Proposed Project may play a role in contributing additional ROG, NOx, CO, and particulate matter emissions in the Basin, which is already in extreme nonattainment for ozone, and could delay the efforts towards achieving attainment deadlines as outlined in the 2016 AQMP. Therefore, South Coast AQMD staff recommends that the Lead Agency revise the consistency analysis in the Final EIR.

Additional Recommended Mitigation Measures

5. 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. South Coast AQMD staff recommends the following mitigation measures as suggested resources and guidance that the Lead Agency should review for incorporation in the Final EIR. The recommended mitigation measures will further reduce the Proposed Project's construction emissions, particularly NOx emissions from Tier IB development phase, provide guidance on project-level air quality analysis and formulation of mitigation measures for development projects under Tier II development phase, provide CEQA streamlining and tiering benefits, and facilitate the achievement of attainment goals and timelines outlined in the 2016 AQMP. For more information on potential mitigation measures as guidance to the Lead Agency, please visit South Coast AQMD's CEQA Air Quality Handbook website[31].

Performance Standards-Based Periodic Technology Review

- Since the Proposed Project would be implemented over an estimated period of 20-plus years, the Lead Agency should take this opportunity to incorporate a periodic, technology review of both off-road construction equipment and on-road haul trucks that will be used during the Proposed Project. South Coast AQMD staff recommends that the Lead Agency develop project-specific or agency-wide strategies to foster and facilitate the deployment of the lowest emissions technologies as they becomes available. This may include incorporating a performance standards-based technology review, or developing other comparable strategies or tools, to periodically assess equipment availability, equipment fleet mixtures, and best available emissions control devices. The deployment should include those technologies that are "capable of being accomplished in a successful manner within a reasonable period of time" (California Public Resources Code Section 21061.1), such as zero- and near-zero emission technologies or best available control technologies (BACTs) that are expected to become more readily available over the life of the Proposed Project. A technology review should also incorporate an appropriate timeline/schedule for the assessment that will also be supportive of emissions reductions goals being implemented at local, regional, state, and federal levels (e.g. South Coast AQMD's AQMPs and other air quality and public health goals). If the technology review identifies that cleaner equipment and fleets have become available, the Lead Agency should commit to incorporating this new technology into the Proposed Project to further reduce the Proposed Project's emissions. South Coast AQMD staff encourages the Lead Agency to involve the public and interested parties, such as the South Coast AQMD and the CARB, in developing an appropriate process and performance standards for technology review.

[31] South Coast AQMD. Accessed at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook.

Mitigation Measures for Construction Air Quality Impacts

- The Lead Agency should consider to include a new air quality mitigation measure to require a project-level LSTs analysis prior to issuance of a grading permit as follows.

  Prior to issuance of a grading permit for new development projects that are one acre or larger, the applicant/developer shall provide air quality analysis of the localized emissions (NOx, CO, PM10, and PM2.5) associated with the maximum daily grading activities for the proposed development. If the localized air quality analysis shows that emissions would exceed South Coast AQMD's air quality CEQA localized thresholds for those emissions, the maximum daily grading activities of the proposed development shall be limited to the extent that could occur without resulting in emissions in excess of South Coast AQMD's significance thresholds for those emissions.

  This mitigation measure ensures that the Lead Agency has adequately analyzed the Proposed Project's localized air quality impacts for Tier II development phase to justify deferring the LSTs analysis, that a project- or site-specific LSTs analysis will be completed in a later stage, and that any nearby sensitive receptors are not adversely affected by the Proposed Project's construction activities that are occurring in close proximity.

- Require the use of off-road diesel-powered construction equipment that meets or exceeds the California Air Resources Board (CARB) and U.S. Environmental Protection Agency (USEPA) Tier 4 off-road emissions standards for equipment rated at 50 horsepower or greater during construction. Such equipment should be outfitted with Best Available Control Technology (BACT) devices including, but not limited to, a CARB certified Level 3 Diesel Particulate Filters (DPF). Level 3 DPFs are capable of achieving at least an 85 percent reduction in particulate matter emissions[32]. A list of CARB verified DPFs are available on the CARB website[33].

  The Lead Agency should include this requirement in applicable bid documents, and that successful contractor(s) must demonstrate the ability to supply compliant equipment prior to the commencement of any construction activities. A copy of each unit's certified tier specification and CARB or South Coast AQMD operating permit (if applicable) should be available upon request at the time of mobilization of each applicable unit of equipment. The Lead Agency should require periodic reporting and provision of written documentation by contractors to ensure compliance, and conduct regular inspections to the maximum extent feasible to ensure compliance.

  In the event that the Lead Agency finds that Tier 4 construction equipment is not feasible pursuant to CEQA Guidelines Section 15364, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is reviewed and approved by the Lead Agency before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, Tier 3 construction equipment, reduction in the number and/or horsepower rating of construction equipment, limiting the number of daily construction haul truck trips to and from the Proposed Project, and/or limiting the number of individual construction project phases occurring simultaneously, if applicable. Any approved alternative technologies/strategies for use by the Lead Agency should be included and

[32] California Air Resources Board. November 16-17, 2004. *Diesel Off-Road Equipment Measure – Workshop*. Page 17. Accessed at: https://www.arb.ca.gov/msprog/ordiesel/presentations/nov16-04_workshop.pdf.
[33] *Ibid*. Page 18.

disclosed in the Air Quality Section of the Final EIR as a project requirement or mitigation measure as a condition of approval.

- Require the use of zero-emission (ZE) or near-zero emission (NZE) on-road haul trucks (e.g., material delivery trucks and soil import/export) such as heavy-duty trucks with natural gas engines that meet the California Air Resources Board (CARB)'s adopted optional NOx emission standard at 0.02 grams per brake horsepower-hour (g/bhp-hr). When requiring ZE or NZE on-road haul trucks, the Lead Agency should include analyses to evaluate and identify sufficient power and supportive infrastructure available for ZE/NZE trucks in the Energy and Utilities and Service Systems Sections of the Final EIR, where appropriate.

  CARB also adopted the statewide Truck and Bus Regulation in 2010. The Regulation requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent[34]. Since the construction schedule of the Proposed Project extends beyond 2023, 2010 model year trucks will be required for the Proposed Project and should become more widely available commercially. Therefore, South Coast AQMD staff recommends that the Lead Agency implement the Truck and Bus Regulation early and require, at a minimum, that construction vendors, contractors, and/or haul truck operators commit to using 2010 model year or newer engines, or establish a vendor(s)/contractor(s) selection policy that prefers vendor(s)/contractor(s) who can supply 2010 model year trucks, and include the requirement in the Proposed Project's Construction Management Plan. The Lead Agency's commitment to early implementation of the Truck and Bus Regulation at the Proposed Project helps facilitate the Proposed Project's transition to 2010 model year trucks in 2023, provides time and opportunities to resolve any implementation challenges ahead of 2023, eases the costs and burden of regulatory compliance over a period of time, and yields emission reductions from fleets earlier than 2023.

  To monitor and ensure ZE, NZE, or 2010 model year trucks are used at the Proposed Project, the Lead Agency should require that operators maintain records of all trucks associated with the Proposed Project's construction and make these records available to the Lead Agency upon request. The records will serve as evidence to prove that each truck called to the Proposed Project during construction meets the minimum 2010 model year engine emission standards. Alternatively, the Lead Agency should require periodic reporting and provision of written records by contractors, and conduct regular inspections of the records to the maximum extent feasible and practicable.

- Encourage construction contractors to apply for South Coast AQMD "SOON" funds. The "SOON" program provides funds to applicable fleets for the purchase of commercially-available low-emission heavy-duty engines to achieve near-term reduction of NOx emissions from in-use off-road diesel vehicles. More information on this program can be found at South Coast AQMD's website: http://www.aqmd.gov/home/programs/business/business-detail?title=off-road-diesel-engines.

Mitigation Measures for Operational Air Quality Impacts

- Provide incentives for vendors and material delivery trucks that would be visiting the medical facilities at the Proposed Project to encourage the use of ZE or NZE trucks during operation, such

[34] California Air Resources Board. December 20, 2018. https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm.

as trucks with natural gas engines that meet CARB's adopted optional NOx emissions standard of 0.02 grams per brake horsepower-hour (g/bhp-hr). At a minimum, incentivize the use of 2010 model year delivery trucks[35]. Include analyses to evaluate and identify sufficient power available for zero emission trucks and supportive infrastructures in the Energy and Utilities and Service Systems Sections of the Final EIR, where appropriate.

South Coast AQMD Rules and Regulations

6. Since the Proposed Project currently generates emissions from various onsite permitted stationary sources, such as emergency generators, boilers, and storage tanks[36], it is recommended that the Lead Agency consult with South Coast AQMD's Engineering and Permitting staff to determine if new permits or any changes to existing South Coast AQMD permits, such as termination or modification, are required, and if compliance with other applicable South Coast AQMD Rules are required and should be discussed in the Final EIR. If implementation of the Proposed Project requires a new air permit or modifications to an existing permit from South Coast AQMD, the Final EIR should identify South Coast AQMD as a Responsible Agency for the Proposed Project. Questions on permits and applicable South Coast AQMD rules can directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385. If there is any information in the permitting process suggesting that the Proposed Project would result in significant adverse air quality impacts not analyzed in the Final EIR or substantially more severe air quality impacts than those analyzed in the Final EIR, the Lead Agency should commit to reevaluating the Proposed Project's air quality and health risks impacts through a CEQA process (CEQA Guidelines Section 15162). For more general information on permits, please visit South Coast AQMD's webpage at: http://www.aqmd.gov/home/permits.

[35] *Ibid.*
[36] Draft EIR. Section 3.2 Air Quality. Page 3.2-14.