



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

May 16, 2019

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Mitigated Negative Declaration (MND) for the Proposed Pacific Coast Project

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 MND.

South Coast AQMD Staff's Summary of Project Description

The Lead Agency proposes to build and operate a refrigerated trailer repair and storage facility with three buildings totaling 35,592 square feet on 7.97 acres (Proposed Project). Construction of the Proposed Project is expected to last approximately 14 months¹.

Responsible Agency, South Coast AQMD Permits, and Rules

Operation of the Proposed Project would include chemical reagents, solvents, fuels, paints, and cleansers². It is recommended that the Lead Agency consult with South Coast AQMD's Engineering and Permitting staff to determine if operation of the Proposed Project would be subject to any South Coast AQMD rules in addition to South Coast AQMD Rule 402 – Nuisance. If a permit from South Coast AQMD is required, South Coast AQMD should be identified as a Responsible Agency for the Proposed Project in the Final MND. The assumptions in the air quality analysis in the Final MND will be used as the basis for permit conditions and limits. 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 MND or substantially more severe air quality impacts than those analyzed in the Final MND, the Lead Agency should commit to re-evaluating the Proposed Project's air quality impacts through a CEQA process (CEQA Guidelines Section 15162). For more information on permits, please visit South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>. Questions on permits can be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

Other Comments

Upon a review of Notice of Intent for the Proposed Project, South Coast AQMD staff found that the MND was circulated for public review and comments from May 8, 2019 to May 24, 2019. This results in a 17-day public review period. CEQA Guidelines Sections 15105 and 15073 require that the Lead Agency shall provide a public review period for a proposed MND of *no less than 20 days* (*emphasis added*). In exceptional circumstances, the State Clearinghouse may set shorter review periods when requested by the Lead Agency (CEQA Guidelines Section 15205). Therefore, South Coast AQMD staff recommends that the Lead Agency clarify if a public review period shorter than 20 days has been set by the State Clearinghouse for the Proposed Project in the Final MND, or correct the public review period by

¹ MND. CalEEMod Annual Output. Page 7.

² MND. Page IS 26.

recirculating the MND for public review for no less than 20 days to comply with the CEQA procedural requirements for MND.

Conclusion

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, response should provide sufficient details 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 do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and the public who are interested in the Proposed Project.

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 me at lsun@aqmd.gov, should you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS
SBC190515-02
Control Number