



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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Notice of Intent to Adopt a Mitigated Negative Declaration (MND) for the Assembly and Light Manufacturing Building Project (Proposed Project)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to review the above-mentioned document. The City of Grand Terrace 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.

South Coast AQMD Staff's Summary of Project Information in the MND

Based on the MND, the Proposed Project consists of constructing a 173,000-square-foot building for assembly and light manufacturing use on 9.2 acres. Regional access to the project site is provided via I-215, and local access is provided via Barton Road. Based on a review of aerial photographs, South Coast AQMD staff found that the nearest sensitive receptor (e.g., residential development) is located 115 feet from the Proposed Project site. Construction of the Proposed Project is anticipated from spring 2024 through summer 2025. The project is located southwest of Barton Road and La Crosse Avenue at 21801 and 21823 Barton Road.

South Coast AQMD Staff's Comments

User-Defined Land Use Subtype in the California Emissions Estimator Model (CalEEMod) Analysis

In the operational CalEEMod output files, alongside the “Unrefrigerated Warehouse-No Rail” and “Manufacturing” land use subtypes, a “User-Defined Industrial” subtype is also included.¹ According to the CalEEMod User Guide, the “User-Defined” option may be chosen to characterize project land use subtypes not included in CalEEMod. If selected, all data on the Land Use screen must be input manually.² However, in the Proposed Project’s CalEEMod output files, the lot acreage and the floor square area use are both set to zero under the “User-Defined Industrial” land use subtype. Since the truck trips for the “User-Defined Industrial” are specified as 105 trips/day and no data is filled under this subtype, there is a potential underestimation of the heavy-duty truck emissions for warehouse activities. Therefore, it is

¹ *Ibid.* Appendix B - Air Quality Impact Analysis. CalEEMod Operational and LST Output Files.

² California Emissions Estimator Model (CalEEMod) Version 2022.1 User Guide. Access at: https://www.caleemod.com/documents/user-guide/CalEEMod_User_Guide_v2022.1.pdf

recommended that the Lead Agency explain why the land use is separated in the CalEEMod analysis and revise the analysis as necessary in the final CEQA document.

South Coast AQMD Air Permits and Role as a Responsible Agency

If the implementation of the Proposed Project would require the use of new stationary and portable sources, including but not limited to emergency generators, fire water pumps, boilers, etc., air permits from South Coast AQMD will be required. The final CEQA document, whether a MND or EIR, should include a discussion about the potentially applicable rules that the Proposed Project needs to comply with. Those rules may include, for examples, Rule 201 – Permit to Construct,³ Rule 203 – Permit to Operate,⁴ Rule 401 – Visible Emissions,⁵ Rule 402 – Nuisance,⁶ Rule 403 – Fugitive Dust,⁷ Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,⁸ Rule 1166 – VOC Contaminated Soil Excavation,⁹ Regulation XIII – New Source Review,¹⁰ Rule 1401 – Air Toxics,¹¹ Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants,¹² Rule 1470 – Requirements for Stationary Diesel Fueled Internal Combustion and Other Compression Ignition Engines,¹³ and etc. It is important to note that when air permits from South Coast AQMD are required, the role of South Coast AQMD would change from a Commenting Agency to a Responsible Agency under CEQA. In addition, if South Coast AQMD is identified as a Responsible Agency, per CEQA Guidelines Sections 15086, the Lead Agency is required to consult with South Coast AQMD.

CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of the process for conducting a review of the Proposed Project and issuing discretionary approvals. Moreover, it is important to note that if a Responsible Agency determines that a CEQA document is not adequate to rely upon for its discretionary approvals, the Responsible Agency must take further actions listed in CEQA Guideline Section 15096(e), which could have the effect of delaying the implementation of the Proposed Project. In its role as CEQA Responsible Agency, the South Coast AQMD is obligated to ensure that the CEQA document prepared for this Proposed Project contains a sufficient project description and analysis to be relied upon in order to issue any discretionary approvals that may be needed for air permits.

³ South Coast AQMD Rule 201 – Permit to Construct. Access at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>.

⁴ South Coast AQMD Rule 203 – Permit to Operate. Access at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>.

⁵ South Coast AQMD Rule 401 – Visible Emissions. Access at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf>.

⁶ South Coast AQMD Rule 402 – Nuisance. Access at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>.

⁷ South Coast AQMD Rule 403 – Fugitive Dust. Access at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf>.

⁸ South Coast AQMD Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines. Access at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1110-2.pdf>.

⁹ South Coast AQMD Rule 1166 - VOC Contaminated Soil Excavation. Access at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>.

¹⁰ South Coast AQMD Regulation 13 – New Source Review. Access at: <https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii>.

¹¹ South Coast AQMD Rule 1401 – Air Toxics. Access at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf>.

¹² South Coast AQMD Rule 1466 - Control of Particulate Emissions from Soils with Toxic Air Contaminants. Access at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf>.

¹³ South Coast AQMD Rule 1470 - Requirements for Stationary Diesel Fueled Internal Combustion and Other Compression Ignition Engines. Access at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf>.

For these reasons, the final CEQA document should be revised to include a discussion about any and all new stationary and portable equipment requiring South Coast AQMD air permits, provide the evaluation of their air quality and greenhouse gas impacts, and identify South Coast AQMD as a Responsible Agency for the Proposed Project as this information will be relied upon as the basis for the permit conditions and emission limits for the air permit(s). Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions regarding what types of equipment would require air permits. For more general information on permits, please visit South Coast AQMD's webpage at <http://www.aqmd.gov/home/permits>.

Conclusion

The Lead Agency is recommended to revise the CEQA analysis to address the aforementioned comments and provide the necessary evidence to sufficiently support the conclusions reached. If the requested information and analysis are not included in the final CEQA document, either the Final MND or other type of CEQA document, the Lead Agency should provide reasons for not doing so. Pursuant to California Public Resources Code Section 21092.5(b) and 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 and notify each public agency when any public hearings are scheduled. 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, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided. In addition, if the Lead Agency decides to adopt the Final MND, please provide South Coast AQMD with a notice of any scheduled public hearing(s).

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 Sahar Ghadimi, Air Quality Specialist, at sghadimi@aqmd.gov should you have any questions.

Sincerely,

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SW:SG

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