



# South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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## **Mitigated Negative Declaration (MND) for the Proposed Desert Rock No. 1 Project**

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

### SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to demolish the existing automobile wrecking structures and to construct six buildings totaling 312,700 square feet (Proposed Project). The Proposed Project would also include the use of interim facilities, which may include the use of power generation equipment<sup>1</sup>.

### Air Quality Analysis

In the Air Quality analysis, the Lead Agency found that the Proposed Project's regional construction and operational air quality impacts would be less than significant. While the use of power generation equipment is foreseeable, the Air Quality analysis for the Proposed Project did not include emissions generated from the power generation equipment, which has likely led to an under-estimation of the Proposed Project's operational air quality impacts<sup>2</sup>. Therefore, it is recommended that the Lead Agency quantify emissions from the power generation equipment in the Final MND. In the event that the Lead Agency finds, after revising the Air Quality analysis, that the Proposed Project's operational emissions would exceed SCAQMD's regional air quality CEQA significance thresholds for operation<sup>3</sup>, the Lead Agency should consider mitigation measures to reduce those impacts to the maximum extent feasible.

### Permits and Compliance with SCAQMD Rules

In the event that a generator rated greater than 50 brake horsepower (bhp) is necessary for the Proposed Project, a permit from SCAQMD would be required, and SCAQMD should be identified as a CEQA responsible agency for this Project in the Final MND. The Final MND should also demonstrate compliance with SCAQMD Rule 201 – Permit to Construct, Rule 203 – Permit to Operate, Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion Engines, and 1110.2 – Emissions From Gaseous- and Liquid-Fueled Engines. If there are permit questions concerning the generator, they can be directed to SCAQMD Engineering and Compliance staff at (909) 396-2315.

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<sup>1</sup> Initial Study/Mitigated Negative Declaration, Desert Rock Development Site 1, Exhibit 11

<sup>2</sup> CalEEMod incorporates up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and is available free of charge at: [www.caleemod.com](http://www.caleemod.com). However, it is important to note that CalEEMod does not quantify the operational stationary source emissions from power generation equipment.

<sup>3</sup> The SCAQMD's air quality CEQA regional pollutant emissions significance thresholds can be found here: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>

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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. SCAQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Jack Cheng, Air Quality Specialist, CEQA IGR Section, at (909) 396-2448, if you have any questions.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS:JC

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