



South Coast Air Quality Management District

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Supplemental Mitigated Negative Declaration (MND) for the Proposed Lakin Tires Conditional Use Permit Case No. 771-1

The South Coast Air Quality Management District (SCAQMD) 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 Supplemental MND.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to increase the originally approved tire storage capability from 50,000 tires to 95,000 tires (Proposed Project). To accommodate the increased capacity, the Proposed Project will also convert the use of 18,972 square feet of the existing building for receiving, sorting, and shipping of used tires.

SCAQMD Staff's Summary of Air Quality Analysis

In the Air Quality Analysis Section, the Lead Agency quantified the Proposed Project's construction and operation emissions and compared them to SCAQMD's regional and localized air quality CEQA significance thresholds. The Lead Agency found that the Proposed Project's air quality impacts would be less than significant. While the Proposed Project's operational air quality impacts would be less than significant, the Lead Agency proposed four mitigation measures. One mitigation measure prohibits the idling of trucks while waiting to be weighed or during loading and unloading. Signage will be posted in delivery areas and the loading dock¹. Another mitigation measure requires facility operators to obtain and maintain any permits that may be required by the SCAQMD².

SCAQMD Staff's Comments

To be consistent with the California Air Resources Board's idling policy³, SCAQMD staff recommends that the Lead Agency minimize idling of all diesel-fueled trucks and equipment to five minutes or less. Additionally, if the Proposed Project requires a permit from SCAQMD, SCAQMD should be identified as Responsible Agency for the Proposed Project in the Final Supplemental MND. For more information on permits, please visit SCAQMD webpage at: <http://www.aqmd.gov/home/permits>. Questions on permits can be directed to SCAQMD's Engineering and Permitting staff at (909) 396-3385

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the Supplemental MND for adoption together with any comments received during the public review process. Please provide the SCAQMD with written responses to the comment contained herein prior to the adoption of the Final Supplemental MND. When responding to issues raised in the comments, response should provide sufficient details giving reasons why specific comments and

¹ MND, Page 33.

² *Ibid.*

³ California Air Resources Board. June 2009. *Written Idling Policy Guidelines*. Accessed at: <https://www.arb.ca.gov/msprog/ordiesel/guidance/writtenidlingguide.pdf>.

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 or useful to decision makers and the public who are interested in the Proposed Project.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

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