



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 Plant Growth Environments Facility

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 MND.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to demolish 13,106 square feet of existing structures and construct a 38,000-square-foot structure with on-site stationary equipment on 1.25 acres (Proposed Project). Construction of the Proposed Project is expected to take approximately 13 months beginning in April 2019 with completion in May 2020¹.

SCAQMD Permits and Applicable Rules and Regulations

Upon a review of the Notice of Intent MND, SCAQMD staff found that the Proposed Project would include on-site stationary equipment such as packaged air handlers, evaporative cooling and fan coil units, and an approximately 550 kilowatt/450 kVA diesel standby generator². The Lead Agency should consult with SCAQMD's Engineering and Permitting staff to determine if operation of this equipment will require a permit from SCAQMD or if the equipment will need to be registered under the Portable Equipment Registration Program (PERP) through the California Air Resources Board (CARB)³, and any applicable SCAQMD rules and regulations that should be discussed to demonstrate compliance in the Final MND. If SCAQMD permits are required, the Lead Agency should specifically identify SCAQMD as a Responsible Agency for the Proposed Project in the Final MND. The assumptions in the air quality analysis in the CEQA document will be used as the basis for permit conditions and limits. The 2015 revised Office of Environmental Health Hazard Assessment (OEHHA) methodology is being used by SCAQMD for determining operational health impacts for permitting applications and also for all CEQA projects where SCAQMD is the Lead Agency. Should there be any questions on permits, please contact the SCAQMD's Engineering and Permitting staff at (909) 396-3385. For more general information on permits, please visit SCAQMD's webpage at: <http://www.aqmd.gov/home/permits>. For more information on the PERP Program, please contact CARB at (916) 324-5869 or visit CARB's webpage at: <https://ww2.arb.ca.gov/our-work/programs/portable-equipment-registration-program-perp>.

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

¹ MND. Page 117.

² *Ibid.* Page 119. Notice of Intent to Adopt – Mitigated Negative Declaration.

³ South Coast Air Quality Management District. *Portable Equipment Registration Program (PERP)*. Accessed at: <http://www.aqmd.gov/home/permits/equipment-registration/perp>.

process. Please provide SCAQMD 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.

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 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
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