



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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41972 Garstin Drive
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Notice of Intent to Adopt a Mitigated Negative Declaration (MND) for the Garstin Water Operations Facility Replacement Project (Proposed Project)

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to review the above-mentioned document. The City of Big Bear Lake 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 project consists of demolishing the existing operations building and constructing 13,600 square foot operations building with solar panels, a 10,000 square foot warehouse, and a 7,200 square foot parking structure with solar panels, liquid chlorine storage, battery backup, generator backup, and an electrical equipment room. Based on a review of aerial photographs, South Coast AQMD staff found that the nearest sensitive receptor, an existing Community Hospital, is approximately 300 feet from the Proposed Project site. Construction is anticipated to begin in Spring 2025 and is expected to be conducted over a 2-year construction period. The project is located north of Garsin Drive, south of Fox Farm Road, and west of Big Bear Boulevard.¹

South Coast AQMD Staff's Comments

Resolving Land Use Discrepancies: Ensuring Consistency in the Project Description within the MND Document

Based on the project description outlined in the MND document, the Proposed Project includes the design and construction of an approximate 13,600 square foot, concrete block, single-story operations building with solar panels, a 10,000 square foot, metal, single-story warehouse warm storage building, and a 7,200 square foot, concrete block, single story, covered parking structure with solar panels, as elaborated on Page 7 of the document. However, upon reviewing the project description on page 219, a discrepancy emerges from the abovementioned project description. 9,000 square feet of land use is designated as unrefrigerated warehouse No Rail, alongside

¹ IS-MND. Page 7.

11,000 square feet allocated for an office park. Considering this inconsistency, the South Coast AQMD staff recommend that the Lead Agency provide clarification regarding this deviation to correct the project description and accurately reflect the intentions and scope of the Proposed Project.

Operational Emissions from Stationary and Portable Sources

Based on the Proposed Project's description, multiple stationary and portable sources would likely be utilized during the project operations, such as diesel emergency generators, emergency fire pumps, boilers, and so on. However, upon reviewing the CalEEMod output files and the MND document, the operational emissions from these sources have not been thoroughly assessed to include the emissions from those equipment. Failing to account for these additional potential operational stationary and portable sources and the associated emissions in the analysis could lead to an underestimation of the total operational emissions. Therefore, it is crucial to address all potential operational stationary and portable sources and incorporate their emissions into the analysis and the MND document to ensure an accurate assessment of the project's environmental impact.

Overlapping Construction and Operational Activities

According to the MND, there will be a period of overlapping construction and operational activities.² Even though the Proposed Project consists of approximately 1.47 acres of land throughout 2-year construction, the MND document needs to analyze the overlapping scenario between the construction and operational activities. Therefore, South Coast AQMD staff recommends that the Lead Agency revise the air quality analysis section to consider the overlapping construction and operation. The estimated overlapped emissions should then be compared to South Coast AQMD's regional air quality CEQA operational thresholds to determine their level of significance, which should be included in the Final MND. If the overlapped emissions analysis is not included in the Final MND, the Lead Agency should provide reasons for not having them supported by substantial evidence in the record.

South Coast AQMD Air Permits and Role as a Responsible Agency

Based on the project description, multiple stationary and portable sources, such as diesel emergency generators, emergency fire pumps, boilers, and more, would likely be utilized during the project operations. The project description indicates the proposal of at least one new engine, a backup battery, and the addition of liquid chlorine storage. It needs to be clarified in the MND document whether the liquid chlorine storage requires a permit from SCAQMD. Current active permits applied for from SCAQMD include G14861, G6254, G6188, F2995, F2994, F2993, and F01224.³ Thus, if the implementation of the Proposed Project would require the use of new stationary and portable sources, including but not limited to emergency generators, battery backups, 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,³⁰ Rule 203 – Permit to Operate,³¹ Rule 401 – Visible Emissions,³² Rule 402 –

² IS-MND. Page 7.

³ [SCAQMD FIND](#)

Nuisance,³³ Rule 403 – Fugitive Dust,³⁴ Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,³⁵ Rule 1166 – VOC Contaminated Soil Excavation,³⁶ Regulation XIII – New Source Review,³⁷ Rule 1401 – Air Toxics,³⁸ Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants,³⁹ Rule 1470 – Requirements for Stationary Diesel Fueled Internal Combustion and Other Compression Ignition Engines,⁴⁰ 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. South Coast AQMD is concerned that the project description and analysis in its current form in the MND is inadequate to be relied upon for this purpose.

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

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

Sincerely,

Sam Wang

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Planning, Rule Development & Implementation

SW:SG

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