

Air Quality

Air Quality: Appendix B(g)(1)

Information required:

Please provide an evaluation of the project's cumulative air quality impacts.

Response:

The cumulative impacts assessment methodology, which is summarized in Appendix F.8- Cumulative Impacts Analysis Protocol, includes the applicable sources within an 8-mile radius of the proposed Project site that meet the following criteria.

1. Projects that have recently commenced operations whose emissions may not be reflected in the ambient monitoring background data, i.e., commenced operations after January 2010.
2. Projects that have filed for air pollution permits to construct which have not been issued, but that are reasonably anticipated to be issued, and subsequently constructed and operated.
3. Foreseeable (reasonably known) projects that have not, to date, filed any applications for development.

Historically, the CEC has reviewed the inventory prior to the commencement of the modeling analysis in order to remove sources that the CEC does not typically consider in this type of analysis. For example, emergency equipment is not included in the cumulative modeling inventory. Because the local APCD often requires a longer lead timeframe than the application schedule allows, the actual cumulative modeling assessment is often supplied as a post data-adequacy requirement.

Once the applicant receives the cumulative source inventory from the APCD, the Applicant, in cooperation with CEC staff, will finalize the listing of sources to be included, and the cumulative modeling and analysis will be prepared and submitted for review and comment.

Based on the protocol in Appendix F.8, the data identified in items 1 through 3 above, has been requested from the San Diego APCD.

Thus, based on past CEC filings, the Applicant believes that the cumulative analysis protocol has met the needs of the data adequacy requirements.

Air Quality: Appendix B(g)(8)(a)

Information required:

Please provide the permit application completeness letter from the San Diego Air Pollution Control District.

Response:

Per the San Diego APCD rules, the AFC document serves as the Application for the Authority to Construct permit at the District level. The AFC document, which included the APCD permit

application forms, was filed with the Air District on September 13, 2011. This submittal included the payment of the required fees as calculated by both the District and the Applicant. A permit application completeness letter from the San Diego APCD was sent on October 4, 2011; the application was deemed incomplete by the APCD. A copy of the letter is provided in Attachment A.1. The Applicant is working with the APCD to resolve the items listed in their letter; a preliminary summary of the Applicant's response is shown in Attachment A.2. It is noted that the specific response will vary from that provided in the attachment pending the outcome of the Applicant and the APCD's discussions.

The current project contact at the San Diego APCD is as follows:

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