



# South Coast Air Quality Management District

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## **Draft Mitigated Negative Declaration (MND) for the Big Bear Regional Wastewater Agency's Sewer Master Plan Project**

The South Coast Air Quality Management District (AQMD) 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 CEQA document.

AQMD staff notes that on page 3 of the Initial Study that the proposed Sewer Master Plan will accommodate approximately 0.8% growth over the next 20 years (a total of 16% growth). It appears that this growth in operations will only occur if the proposed new facilities discussed in the Draft MND are built. Therefore, any emissions associated with this increase in operations should be evaluated and compared against threshold levels prior to making a determination of significance. Specifically, while it appears that the air quality analysis included an analysis of increased operational electricity use from this growth, emissions from wastewater treatment were not included. AQMD staff recommends that the lead agency evaluate these emissions prior to finalizing the MND for this project. These estimates should include all criteria pollutants as well as greenhouse gases. Emissions calculation methodologies can be found in section 4.3 of the US EPA's AP-42 guidance.

Please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final Mitigated Negative Declaration. The AQMD staff is available to work with the Lead Agency to address these and any other air quality questions that may arise. Please contact me at (909) 396-3244, if you have any questions regarding these comments.

Sincerely,

Ian MacMillan  
Program Supervisor, Inter-Governmental Review  
Planning, Rule Development & Area Sources