



South Coast Air Quality Management District

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Mr. Robert Tock, Director, rtock@jcsd.us
Engineering and Operations
Jurupa Community Services District
11201 Harrel Street
Jurupa Valley, CA 91752

**Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) for the
Proposed Non-Potable Water Service Expansion in the Eastern Portion of the
District (District Project No. 3657DP)**

The South Coast Air Quality Management District (SCAQMD) 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 Mitigated Negative Declaration.

In the project description, the lead agency proposes several pipeline alignments that will involve the installation of underground pipelines and construction of pump stations that will expand non-potable water service within the City of Jurupa Valley and other communities including Glen Avon, Pedley, Indian Hills and Sunnyslope. In the project description, the lead agency estimates that construction activities for the Reach 7 portion of the proposed project (based on linear feet and the amount of area disturbed) would present the worst-case scenario for construction emission impacts. The Reach 7 activities will involve construction of 11,900 linear feet of 16-inch diameter pipeline and include approximately 3.28 acres of soil disturbance. This activity would take approximately four months to complete and would begin in early 2013. Project long-term impacts were not estimated in the Draft MND.

Although the lead agency mentioned long-term emission sources including the use of internal combustion generators for the pump motors and maintenance vehicles servicing different sites, overall operational air quality impacts were not actually calculated in the Draft IS/MND. The SCAQMD staff is also concerned that the project description is incomplete and that operational impacts be included in the Final CEQA document. The project description should include more information concerning the generators including the number of generators, locations, horsepower ratings, hours of operation per day, types (e.g., standby generator, etc.), fuel(s) used, etc. The Final CEQA document should also include emission estimates from all operational sources including the generators and maintenance vehicles. In addition, the appropriate documentation (calculations, methodologies, equations, emission factors, etc.) to support the lead agency's finding should be also added in the Final MND. The inclusion of the operational emissions from

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the generators is also necessary since the SCAQMD has permitting responsibility for emission sources including generators. These generator emission estimates are also part of the CEQA review process and should be consistent in both the Final MND and permit applications submitted to SCAQMD permit staff for review. Generator questions for the proposed project can be addressed by SCAQMD staff at (909) 396-2618.

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. The SCAQMD staff would be available to work with the Lead Agency to address these issues and any other air quality questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,



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

Attachment

IM:GM

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