



# South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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## **Draft Environmental Impact Report (Draft EIR) for the Proposed Doheny Ocean Desalination Project (SCH No.: 2016031038)**

The 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 EIR.

### SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to construct an ocean water desalination facility of up to 15 million gallons per day (MGD) of potable drinking water (Proposed Project). The Proposed Project would also include construction of a subsurface water intake system, an ocean water conveyance pipeline, a concentrate (brine) disposal system, a product water storage tank and distribution system, and offsite electrical transmission facilities. Construction of the Proposed Project is expected to take approximately 38 months.

### General Conformity Review and Determination

In the Air Quality Analysis, the Lead Agency included a General Conformity review and analysis. The conformity determination process is intended to demonstrate that a proposed Federal action will not: (1) cause or contribute to new violations of a national ambient air quality standard (NAAQS); (2) interfere with provisions in the applicable SIP for maintenance of any NAAQS; (3) increase the frequency or severity of existing violations of any standard; or (4) delay the timely attainment of any standard.

The South Coast Air Basin (Basin) is designated as extreme non-attainment for ozone and serious non-attainment for PM<sub>2.5</sub>. To streamline the review process and to facilitate conformity determinations for projects in the Basin, two separate VOC and NO<sub>x</sub> general conformity budgets were established in the Final 2012 AQMP: 1 tons per day (tpd) of NO<sub>x</sub> and 0.2 tpd of VOC were set aside for this purpose every year, starting in 2013 until 2030. SCAQMD has set up a tracking system for projects requiring conformity determinations on a first come first serve basis, whereby the project emissions are debited from the applicable set aside accounts until they are depleted.

Should the Lead Agency have any questions related to the SCAQMD General Conformity review process and determination, the questions can be directed to Ms. Sang-Mi Lee, Program Supervisor, at [slee@aqmd.gov](mailto:slee@aqmd.gov).

### SCAQMD Permits

Statewide Portable Equipment Registration is required for certain portable equipment used onsite for less than one year, and SCAQMD permit is required if onsite portable equipment is used for one year or more (California Health and Safety Code Section 41755). In the event that implementation of the Proposed Project requires a permit from SCAQMD, SCAQMD should be identified as a Responsible Agency for

the Proposed Project in the Final EIR. Any assumptions used in the air quality analysis in the Final EIR will be the basis for permit conditions and limits. For more information on permits, please visit SCAQMD webpage at: <http://www.aqmd.gov/home/permits>. Questions on permits can be directed to SCAQMD's Engineering and Permitting staff at (909) 396-3385.

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), SCAQMD staff requests that the Lead Agency provide SCAQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail 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 will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful or useful to decision makers and to the public who are interested in the Proposed Project.

SCAQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact me at [lsun@aqmd.gov](mailto:lsun@aqmd.gov) if you have any questions regarding the enclosed comments.

Sincerely,



Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

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