



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Mitigated Negative Declaration (MND) for the Proposed Regional Water Reclamation Facility Upgrade and Expansion

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 MND.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to upgrade and expand the existing facility from eight million gallons per day (MGD) to 12 MGD on 56 acres (Proposed Project). The Proposed Project would also include reliability and redundancy upgrades and a 4-MGD capacity expansion using membrane bioreactor and ultraviolet treatment processes. Based on a review of aerial photographs, SCAQMD staff found that some single-family residential uses are located along Strickland Avenue west of the Proposed Project, where construction activities of Design Packages 1 and 2 will take place. Construction of Design Package 1 will take approximately 18 months followed by a 22-month construction phase for Design Package 2¹.

SCAQMD Staff's Summary of the Air Quality Analysis

The Lead Agency quantified the Proposed Project's construction emissions for Design Packages 1 and 2 in tons² and compared them to SCAQMD regional air quality CEQA significance thresholds in pounds per day and found that the Proposed Project would not be expected to generate significant adverse air quality impacts during construction. The Lead Agency also quantified the Proposed Project's operational emissions in tons per year³ and found that the Proposed Project would not result in significant adverse air quality impacts during operation.

SCAQMD Staff's Comments

SCAQMD Air Quality CEQA Significance Threshold for PM 2.5

Table 2-1 and Table 2-2 in the MND showed that SCAQMD regional air quality CEQA significance threshold for PM 2.5 during construction was 75 pounds per day. This is not correct. It should be 55 pounds per day. The Lead Agency should correct the tables in the Final MND.

Construction and Operational Air Quality Impacts Analysis

The Proposed Project's construction and operational emissions were shown in tons or tons per year in the MND. SCAQMD air quality CEQA significance thresholds are in pounds per day. Additionally, while

¹ MND. Page 2-7.

² MND. Table 2-1 and Table 2-2. Pages 2-7 and 8.

³ MND. Table 2-3. Page 2-9.

the Lead Agency quantified the Proposed Project's operational emissions in Table 2-3, it did not compare them to SCAQMD regional air quality CEQA significance thresholds for operation to determine the level of significance. To have a meaningful comparison and provide substantial evidence in the CEQA document to support a fair argument that the Proposed Project's construction and operational activities would not have any significant adverse effects on air quality, SCAQMD staff recommends that the Lead Agency revise Table 2-1, Table 2-2, and Table 2-3 and compare the Proposed Project's construction and operational emissions in pounds per day to SCAQMD air quality CEQA significance thresholds to determine the level of significance in the Final MND.

Overlapping Construction Activities from Design Packages 1 and 2

After reviewing the MND, it was unclear to SCAQMD staff if the construction activities for two design packages would overlap. The Lead Agency quantified the construction emissions for each of the design packages separately. To analyze a worst-case impact scenario, it is recommended that the Lead Agency use its best efforts to identify any overlapping construction activities between two design packages and quantify the emissions in the Final MND, unless the Lead Agency includes requirements and/or conditions in applicable bid document and/or development agreement to expressly prohibit overlapping construction activities.

Localized Air Quality Analysis during Construction

Existing single-family residences are located west of the Proposed Project along Strickland Avenue. Construction of the Proposed Project, though short-term, will be in close proximity to sensitive receptors (e.g., residential uses). Therefore, SCAQMD staff recommends that the Lead Agency quantify the Proposed Project's localized emissions and disclose the localized air quality impacts in the Final MND to ensure that any nearby sensitive receptors are not adversely affected by the construction activities that are occurring in close proximity. SCAQMD guidance for performing a localized air quality analysis is available on SCAQMD website⁴.

Mitigation Measures

In the event that the Lead Agency finds, after revising the Air Quality Analysis based on the comments, that the Proposed Project's construction and/or operational emissions would exceed SCAQMD's air quality CEQA significance thresholds, feasible mitigation measures to minimize these impacts are required. Several resources are available to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project, including:

- Chapter 11 of SCAQMD's CEQA Air Quality Handbook.
- SCAQMD's CEQA web pages available here: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>.
- SCAQMD's Mitigation Monitoring and Reporting Plan (MMRP) for the 2016 Air Quality Management Plan (2016 AQMP) available here (starting on page 86): <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf>.

SCAQMD Permits

The Lead Agency stated that SCAQMD permits would be required for implementation of the Proposed Project⁵. As such, SCAQMD should be identified as a Responsible Agency for this Project in the Final

⁴ South Coast Air Quality Management District. Localized Significance Thresholds. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

⁵ MND. Page 1-12.

MND. Please note that the assumptions in the air quality analysis in the Final MND will be the basis for permit conditions and limits. If there are permitting questions, they can be directed to SCAQMD Engineering and Permitting staff at (909) 396-2551.

General Conformity Review and Determination

In the Air Quality Analysis, the Lead Agency stated that it would be applying for a State Revolving Fund (SRF) loan from the State Water Resources Control Board (SWRCB)⁶. The SRF Loan Program is subject to, among other requirements, the General Conformity Rule for the Clean Air Act⁷.

Please note that 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_{2.5}. To streamline the review process and to facilitate conformity determinations for projects in the Basin, two separate VOC and NO_x general conformity budgets were established in the Final 2012 AQMP: 1 tons per day (tpd) of NO_x 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.

Closing

Pursuant to 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. Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, response should provide sufficient details 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 do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful or useful to decision makers and 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 if you have any questions regarding the enclosed comments.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS

RVC180529-07
Control Number

⁶ *Ibid.*

⁷ *Ibid.*