



South Coast Air Quality Management District

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Initial Consultation Package for the Proposed WR-34 Hydroelectric Power Generation Turnout Facility in the City of Temecula

The South Coast Air Quality Management District (AQMD) is in receipt of the initial consultation package that describes the proposed project's potential environmental impacts. In the project description, the lead agency proposes to construct the WR-34 Hydroelectric Power Generation Facility that would allow for the capture of approximately 400 feet of excess pressure head that is dissipated by the existing WR-34 Turnout Facility (Turnout Facility) before discharging into the Santa Margarita River. This will be accomplished by incorporating the hydroelectric turbine-generator unit into the existing turnout facility to recover the available head that is presently being dissipated, enabling the recovery and conversion of presently lost energy into an available, renewable resource. The project would include a 335 kw hydroelectric turbine generator rated at 400 feet net head with associated mechanical, electrical and control equipment.

Based upon the project description that shows minimal project environmental impacts, the AQMD staff has no comments at this time but will reserve any comments we may have to the CEQA process. Finally, the AQMD staff looks forward to receiving the CEQA document mentioned in the initial consultation package. In the air quality analysis of the CEQA document, the Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project. Applicable air quality impacts from both construction and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the analysis.


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In addition to analyzing regional air quality impacts the SCAQMD recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LST's can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a localized significance analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>.

The AQMD staff is 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
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IM:GM

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