



South Coast Air Quality Management District

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September 21, 2012

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East Municipal Water District
P.O. Box 8300
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Draft Mitigated Negative Declaration (Draft MND) for the Proposed East Valley DVL Area Recycled Water Storage Demonstration 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.

The lead agency proposes the construction, operation and data collection of a recycled water storage basin as a demonstration project over a period of up to four years. The project site is an existing pond that is approximately six acres in size located adjacent to a larger 80 acre pond area. Construction would begin in the fall of 2012. A temporary above-ground pipeline and appurtenances would be constructed and connected to an existing 12-inch diameter recycled pipeline located at the southeastern terminus of Searl Parkway. Construction would also include six monitoring wells and with a temporary levee to enclose the six acre pond area. Soils to build the levee would be obtained on-site from sediments washed into the pond and soil disturbance would include grading of the basin. Cut and fill activities are proposed and would be balanced on-site.

The AQMD staff is concerned that although the lead agency has described potential air quality impacts in the air quality section, a quantified estimate of regional emissions from project construction activities was not included, as required by CEQA, to demonstrate that project construction activity air quality impacts do not exceed the recommended thresholds of significance. The AQMD staff therefore recommends that the lead agency include construction air quality impacts in the Final MND. Guidance for existing air quality models that can assist in estimating regional air quality impacts can be found on the AQMD CEQA website¹ and in the AQMD CEQA Air Quality Handbook². Should the lead agency

¹ AQMD website can accessed at <http://www.aqmd.gov/ceqa/>

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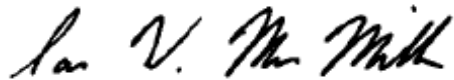
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conclude after its analyses that construction air quality impacts exceed the AQMD daily significance thresholds, staff has compiled mitigation measures in addition to those measures listed starting on page 13 of the Draft MND that can be implemented if the air quality impacts are determined to be significant.³

Please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. The AQMD staff is available to work with the Lead Agency to address these issues and any other 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

IM:GM

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² The SCAQMD CEQA Air Quality Analysis Handbook is available from SCAQMD Subscription Services by calling (909) 396-3720. Supplementary guidance is also available on the SCAQMD website at: <http://www.aqmd.gov/ceqa/hdbk.html> .

³ http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html