



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL AND USPS:

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pkalaria@evmwd.net

Parag Kalaria, P.E., Interim Director
Engineering and Water Resources
Elsinore Valley Municipal Water District
31315 Chaney Street
Lake Elsinore, CA 92530

Mitigated Negative Declaration (MND) for the Proposed Horsethief Canyon Water Reclamation Facility Upgrades and Expansion Project

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 0.5 to 0.8 million gallons per day (MGD) annual average flow (Proposed Project). The Proposed Project would include construction of an additional wastewater treatment process train for secondary treatment. The Proposed Project would also include modifications to existing headworks, new raw sewage diversion box, new dewatering system, new truck loading facility, two new pond pump stations, and new biofilter. Construction is expected to take approximately 18 months¹.

SCAQMD Staff's Comments

Localized Air Quality Analysis during Construction

Based on a review of aerial photographs, SCAQMD staff found that existing single-family residences are located south and southwest of the Proposed Project along Kicking House Drive and Horsethief Canyon Road. "The closest residential receptor is approximately 200 feet south of the facility²." Since construction of the Proposed Project, though short-term, will be in a close proximity to sensitive receptors (e.g., residential uses), 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. SCAQMD guidance for performing a localized air quality analysis is available on SCAQMD website³.

Mitigation Measures

In the event that the Lead Agency finds, after revising the Air Quality Analysis based on the comment above, that the Proposed Project's localized construction 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:

¹ MND. Page 2-2.

² MND. Page 3-5.

³South Coast Air Quality Management District. Localized Significance Thresholds. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

- 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 Project⁴. As such, SCAQMD should be identified as a Responsible Agency for the Proposed Project in the Final 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.

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 or Daniel Garcia, Program Supervisor, at dgarcia@aqmd.gov if you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

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⁴ MND. Page 1-2.