

SENT VIA E-MAIL:

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**Mitigated Negative Declaration (MND) for the Proposed Smith Reservoir
Replacement Project (Proposed Project)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to review the above-mentioned document. Serrano Water District is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff (Staff) has provided a brief summary of the project information and prepared the following comment.

South Coast AQMD Staff's Summary of Project Information in the MND

Based on information provided in the MND, the Proposed Project consists of construction and operation of a replacement 6-million-gallon (MG) reservoir and pump station on an approximately 1.7-acre site.^{1,2} The new reservoir and pump station will replace the existing reservoir and pump station (known as Smith Reservoir) located near the southwest corner of Taft Ave and Sycamore St in the City of Villa Park, CA 92861.³ The Lead Agency evaluated several studies on the existing Smith Reservoir. These studies identified numerous seismic weaknesses and other inadequate structural conditions. Ultimately it was decided that the existing Smith Reservoir is near the end of its useful life and the reservoir and pump station must be replaced.⁴ Of interest to the South Coast AQMD is that the Proposed Project will be equipped with a new emergency standby generator (diesel fueled) and new generator room.⁵ The replacement pump station will also have an increased maximum capacity from 7,400 gallons per minute (gpm) to 8,400 gpm.⁶ The Proposed Project is situated in a residential zone and is adjacent to single-family homes.⁷ Construction of the Proposed Project is anticipated to occur in two phases for a total duration of approximately 28 months,⁸ commence in the fourth quarter 2024,⁹ and be completed by the third quarter of 2026.¹⁰

South Coast AQMD Staff's Comments on the MND

South Coast AQMD Air Permits and Role as a Responsible Agency

Staff reviewed the MND and notes that construction Phase 1 includes:

¹ Draft Initial Study/Mitigated Negative Declaration for the Smith Reservoir Replacement Project (IS/MND). Page 1-1.

² IS/MND. Page 2-3.

³ *Ibid.* Figure 2-2. Project Location.

⁴ *Ibid.* Page 2-2 – 2-3.

⁵ *Ibid.* Page 2-5.

⁶ *Ibid.* PDF Page 2.

⁷ *Ibid.* Page 2-2.

⁸ *Ibid.* Page 3-11.

⁹ *Ibid.* PDF Page 184.

¹⁰ *Ibid.* PDF Page 282.

- installation of a new emergency standby generator (diesel fueled) and^{11,12}
- construction of a generator room that is in a different location than the existing generator building (see Figure 2-6 below from MND).^{13,14}

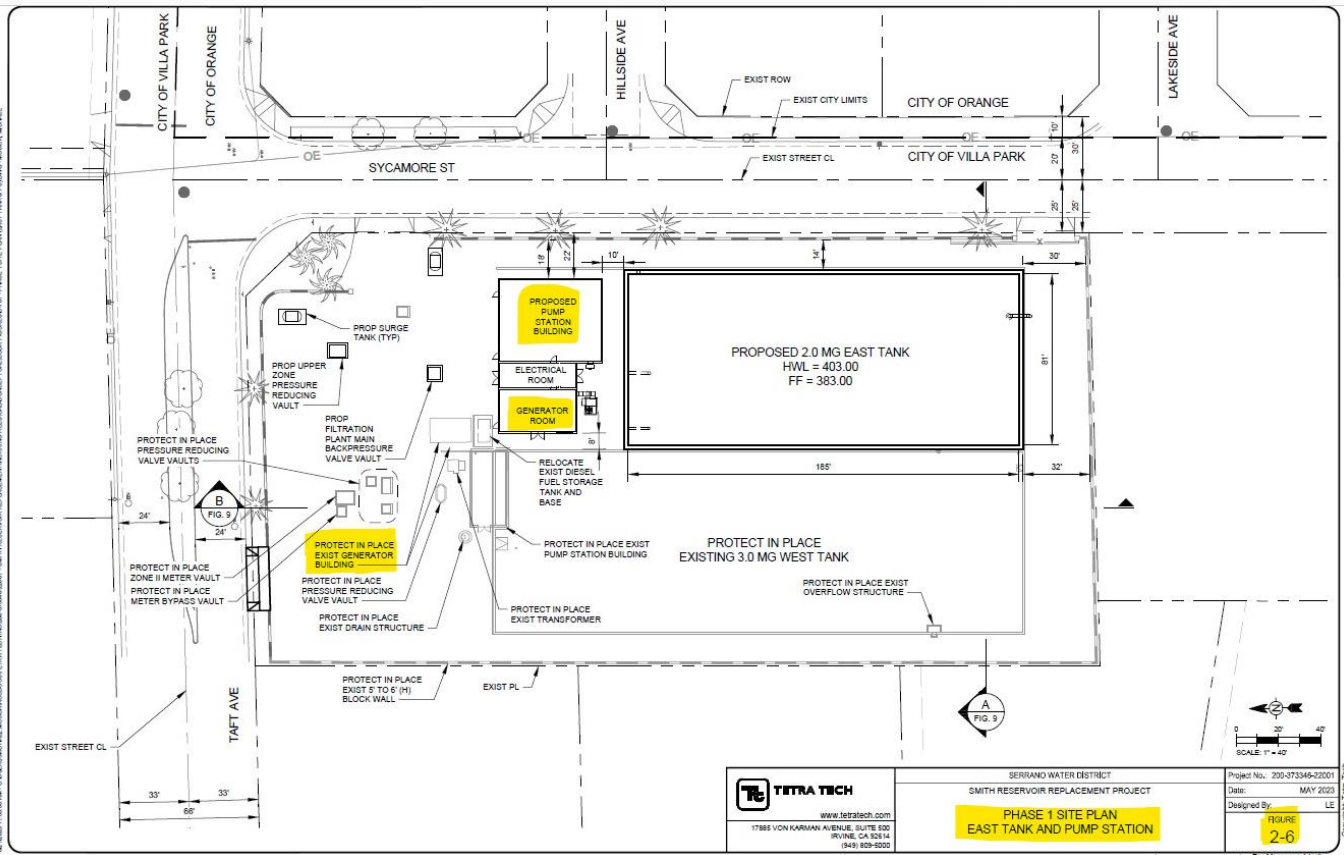


Figure 2-6. Phase 1 Site Plan

Staff also notes that construction Phase 2 includes:

- removal and disposal of the existing emergency standby generator (diesel fueled) and^{15,16}
- removal and disposal of the existing generator building.^{17,18}

For the Proposed Project location, South Coast AQMD records show a facility ID # of 107461. Under this ID # is an active South Coast AQMD air permit (permit #F79108) for one internal combustion engine of 764 brake horsepower (BHP), diesel fueled, and driving an emergency generator. The Lead Agency states in the MND that a South Coast AQMD construction permit will be required.¹⁹ From information provided in the MND, however, Staff is unable to determine what type of South Coast AQMD air permit application will be required for the new emergency standby generator proposed to be installed during

¹¹ IS/MND. Page 2-3.

¹² *Ibid.* Page 2-5.

¹³ *Ibid.* Page 2-5.

¹⁴ *Ibid.* Figure 2-6. Phase 1 Site Plan East Tank and Pump Station.

¹⁵ *Ibid.* Page 2-5.

¹⁶ *Ibid.* Figure 2-5. Phase 2 Site Demolition Plan.

¹⁷ *Ibid.* Page 2-5.

¹⁸ *Ibid.* Figure 2-5. Phase 2 Site Demolition Plan.

¹⁹ *Ibid.* Page 2-8.

construction Phase 1 (e.g. application for a new permit to operate, application for a permit modification, application for a change of conditions, etc.).

If implementation of the Proposed Project would require the use of new stationary sources, including but not limited to emergency generators, fire water pumps, boilers, etc., air permits from South Coast AQMD will be required and the role of South Coast AQMD would change from a Commenting Agency to a Responsible Agency under CEQA. In addition, if South Coast AQMD is identified as a Responsible Agency, per CEQA Guidelines Section 15086, the Lead Agency is required to consult with South Coast AQMD. Furthermore, CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of evaluating the applications for air permits. For these reasons, the Final MND should include a discussion about any new stationary equipment requiring South Coast AQMD air permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project.

The Final MND should also include calculations and analyses for construction and operation emissions for any new stationary sources, as this information will also be relied upon as the basis for the permit conditions and emission limits for the air permit(s). Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions regarding what types of equipment would require applications for new air permits. For more general information on permits, please visit South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>.

Conclusion

The Lead Agency is recommended to revise the CEQA analysis to address the aforementioned comments and provide the necessary evidence to sufficiently support the conclusions reached. If the requested information and analysis are not included in the final CEQA document, either the Final MND or other type of CEQA document, the Lead Agency should provide reasons for not doing so. Pursuant to California Public Resources Code Section 21092.5(b) and 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 and notify each public agency when any public hearings are scheduled. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided. In addition, if the Lead Agency decides to adopt the Final MND, please provide South Coast AQMD with a notice of any scheduled public hearing(s).

Thank you for the opportunity to provide comments. South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Evelyn Aguilar, Air Quality Specialist, at eaguilar@aqmd.gov should you have any questions.

Sincerely,

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SW:EA

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