

SENT VIA E-MAIL:

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EP@mwdh2o.com

Michelle Morrison, Senior Environmental Specialist
The Metropolitan Water District of Southern California
Environmental Planning Section
P.O. Box 54153
Los Angeles, CA 90054-0153

**Draft Environmental Impact Report (EIR) for the Proposed Garvey
Reservoir Rehabilitation Project (Proposed Project)(SCH No. 2024010394)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to review the above-mentioned document. The Metropolitan Water District of Southern California (Metropolitan) 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 comments.

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

Based on information provided in the Draft EIR, the Proposed Project consists of construction and operation of improvements to the Garvey Reservoir 142-acre site located at 1061 South Orange Avenue, Monterey Park, Los Angeles County, CA.¹ The Proposed Project site consists of the Garvey Reservoir (maximum storage capacity of 1,600 acre-feet) and pertinent structures and features (see Figure 1).^{2,3} Garvey Reservoir was constructed in 1954 and has since undergone numerous extensive upgrades and repairs.⁴ The reservoir is once again currently in need of upgrades and improvements to ensure reliability, improve seismic safety, ensure compliance with the Americans with Disability Act, and facilitate efficient operations and maintenance.⁵ The Proposed Project's specific workplan consists of, but is not limited to, the following: 1) replacement of the reservoir liner and installation of a new 1,900,000 square feet floating cover; 2) seismic rehabilitation of inlet/outlet tower (I/O); 3) replacement of five valves in the junction structure to improve reliability; 4) upgrade and/or redesign of existing electrical system; 5) installation of new diesel standby generator to replace existing standby generator that is over 30 years old; 6) improvements to the telemetry equipment connecting surge tank to pumps; 7) relocation of existing water quality lab to the administration building and vice versa and upgrades to the water heater, heating, ventilation, and air conditioning system; 8) construction of a new pump station; and 9) miscellaneous upgrades such as upgrades to the ammonia feed system.⁶ The Proposed Project will not result in additional water supplies.⁷ Construction of the Proposed Project will occur in three phases with Phases One and Two taking place approximately between

¹ Draft EIR for the Garvey Reservoir Rehabilitation Project (DEIR), p. 12.

² *Ibid.* Executive Summary, p. 1.

³ *Ibid.* Chapter 2, p. 12.

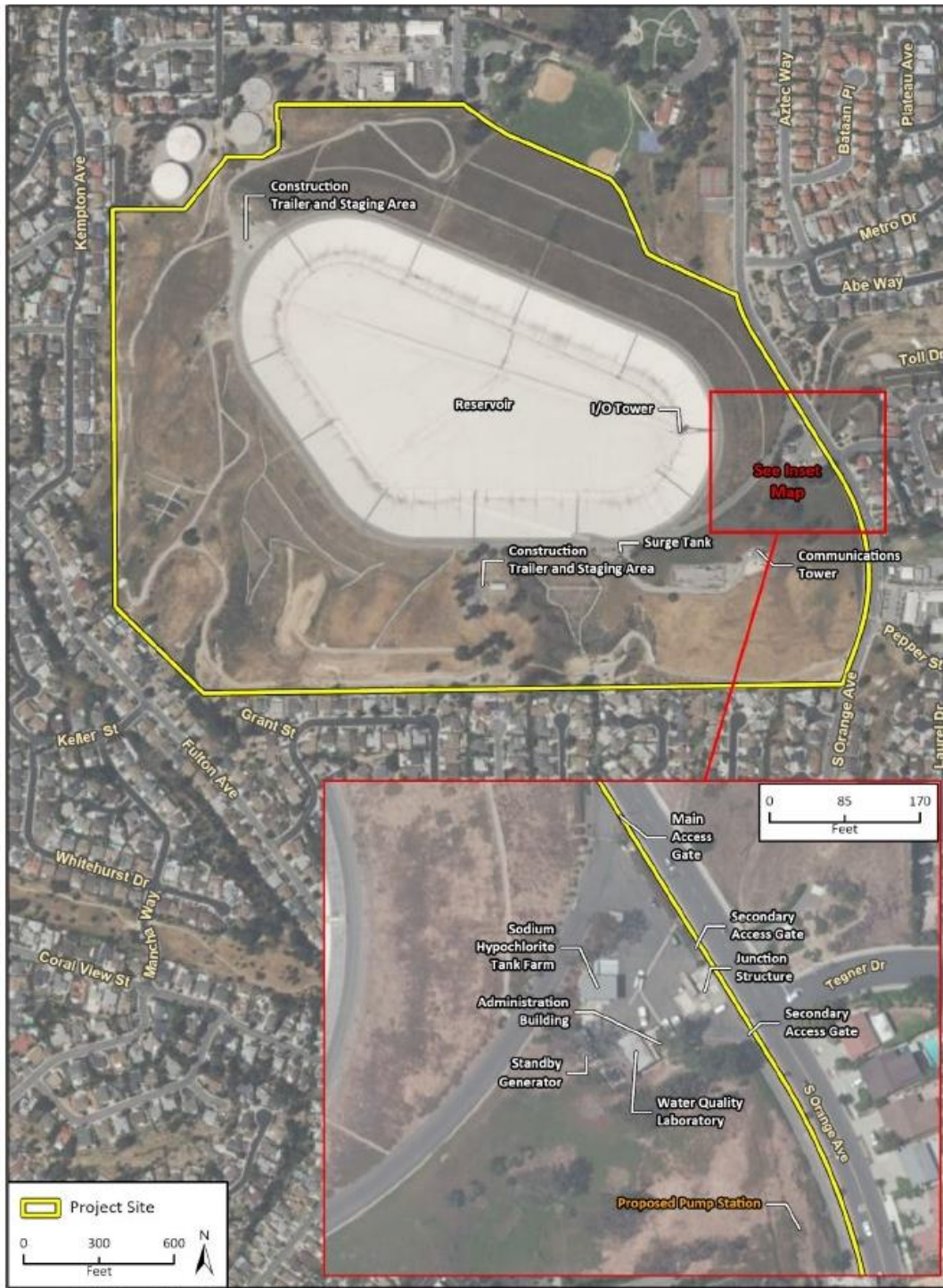
⁴ *Ibid.* Chapter 2, p. 13.

⁵ *Ibid.* Chapter 1 - Introduction, p. 8.

⁶ *Ibid.* Chapter 2 - Project Description, pp. 17-20.

⁷ *Ibid.* Section 3.1 - Air Quality, p. 39.

September 2025 and December 2027 and Phase Three taking place approximately between January 2034 and June 2035.⁸



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Figure 1. Existing and Proposed Site Facilities. Source: p. 16 of Draft EIR

⁸ *Ibid.* Chapter 2 - Project Description, p. 20.

South Coast AQMD Staff's Comments*Proposed Project Likely Subject to the Following Permitting and Compliance Requirements:*

1. During any activities capable of generating fugitive dust including but not limited to earthmoving activities, actions to prevent, reduce, or mitigate fugitive dust emissions for compliance with South Coast AQMD Rule 403 – Fugitive Dust may be required.
2. Excavation/grading work associated with preparation and/or construction of the project may be subject to South Coast AQMD Rule 1166 – Volatile Organic Compound (VOC) Emissions from Decontamination of Soil and as such may require a Rule 1166 VOC contaminated soil mitigation plan. In addition, if certain toxic air contaminants are identified in the soil, compliance with South Coast AQMD Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants may also be required.
3. Permitting public notice as the project site is located within 1,000 feet of a K-12 school (Hillcrest Elementary School located at 795 Pepper St, Monterey Park, CA 91755).
4. New construction application(s) for emergency standby generator(s).
5. New construction application(s) for ammonia storage tank(s) should upgrades to the existing ammonia feed system be necessary.

In addition to the aforementioned South Coast AQMD Rules 403, 1166 and 1466, the following South Coast AQMD rules and regulations are the most pertinent to the Proposed Project and include but are not limited to: Rule 201 – Permit to Construct, Rule 203 – Permit to Operate, Rule 212 – Standards for Approving Permits and Issuing Public Notice, Rule 401 – Visible Emissions, Rule 402 – Nuisance, Rule 1108 – Cutback Asphalt, Rule 1110.2 – Emissions from Gaseous- and Liquid-Fueled Engines, Rule 1113 – Architectural Coatings, Rule 1143 – Consumer Paint Thinners and Multi-Purpose Solvents, Rule 1186 – PM10 Emissions from Paved and Unpaved Roads, and Livestock Operations, Regulation XIII – New Source Review, Rule 1401 – New Source Review of Toxic Air Contaminants, and Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines.⁹

South Coast AQMD Air Permits and Role as a Responsible Agency

The Draft EIR states that the Proposed Project involves installation of a new diesel-fueled standby generator (to be equipped with a US EPA Tier III non-road engine).¹⁰ The Draft EIR also states that a South Coast AQMD Permit to Construct and Permit to Operate would be required for installation of the new standby generator.¹¹ 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

⁹ South Coast AQMD Rule Book, <https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book>.

¹⁰ DEIR. Volume 3 Appendix C: Noise Technical Study - Appendix B Generator Specifications.

¹¹ *Ibid.* Chapter 2 - Project Description, p. 24.

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. 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 EIR 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 EIR 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 water purveyor staff at (909) 396-3627 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

As set forth in California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), the Lead Agency shall evaluate comments from public agencies on the environmental issues and prepare a written response at least 10 days prior to certifying the Final EIR. As such, please provide South Coast AQMD written responses to all comments contained herein at least 10 days prior to the certification of the Final EIR. In addition, as provided by CEQA Guidelines Section 15088(c), if the Lead Agency's position is at variance with recommendations provided in this comment letter, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided.

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,
Sam Wang
Sam Wang
Program Supervisor, CEQA IGR
Planning, Rule Development & Implementation

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