



South Coast Air Quality Management District

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SENT VIA E-MAIL:

September 24, 2024

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Nathan Carlson

East Valley Water District

31111 Greenspot Road

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Notice of Intent to Adopt a Mitigated Negative Declaration (NOI/MND)
for the Proposed East Valley Water District Well No. 129 Project (Proposed Project)
(SCH No.: 2024080915)

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to review the above-mentioned document. The East Valley Water District is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff has provided a brief summary of the project information and prepared the following comments, which are organized by topic of concern.

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

Based on the information provided in the MND, the Proposed Project consists of installing a new well, including the new wellhead, a 4' diameter reinforced concrete pipe, chlorine, and orthophosphate dosing systems, a 55' x 20' concrete masonry unit (CMU) block building with a seam standing metal roof enclosing the wellhead, discharge header, PTW header, electrical equipment, and chemical facilities.¹ The Proposed Project is located northwest of the intersection of Calle Del Rio Street and Vista Clara Street, Highland.² Based on the aerial photograph, Staff found that the nearest sensitive receptor (e.g., residences) is less than 50 feet west of the Proposed Project's boundary. The construction would begin in September 2024 and be completed in August 2025.³

South Coast AQMD Staff's Comments on the NOI/MND

South Coast AQMD Rules, Permits, and Responsible Agency

If the implementation of the Proposed Project would require the use of new stationary and portable sources, including but not limited to emergency generators, fire water pumps, 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 Sections 15086, the Lead Agency is required to consult with South Coast AQMD. In addition, 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

¹ NOI/MND. Page 2.

² *Ibid.*

³ *Ibid.* Page 22.

reasons, the Final MND should include a discussion about any new stationary and portable 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 the new stationary and portable 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 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 Danica Nguyen, Air Quality Specialist, at dnguyen1@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

Sam Wang

Program Supervisor, CEQA-IGR

Planning, Rule Development & Implementation

SW:DN

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