



South Coast Air Quality Management District

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FAXED: DECEMBER 20, 2006

December 20, 2006

Ms. Karen Hackett
Eastern Municipal Water District
Engineering Services
2270 Trumble Road
Perris, CA 92572-8300

Dear Ms. Hackett:

**Draft Mitigated Negative Declaration (DMND) for
Scott Road Booster Station and Pipeline Project
(November 2006)**

The South Coast Air Quality Management District (SCAQMD) 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 in the Final Mitigated Negative Declaration.

Please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Mitigated Negative Declaration. The SCAQMD would be willing to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Charles Blankson, Ph.D., Air Quality Specialist – CEQA Section, at (909) 396-3304 if you have any questions regarding these comments.

Sincerely

Steve Smith, Ph.D.
Program Supervisor, CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS: CB

RVC061201-06
Control Number

**Draft Mitigated Negative Declaration (DMND) for
Scott Road Booster Station and Pipeline Project**

Project Construction Emissions: The lead agency states on page 32 of the DMND that project construction would necessitate excavation and grading activities to prepare the site for development. These activities “have the potential to contribute airborne particulates to the air basin.... However, implementation of mitigation measures to minimize airborne particulates associated with these activities would lessen this impact to below a level of significance.” The lead agency provides no data on the type and number of heavy-duty construction equipment that would be involved in excavation and grading. There is also no information on the number of vehicle trips and distance (mileage) covered for construction workers and construction materials and supplies that would be used for project construction. The lead agency provides no information on emission factors for these emission sources and how much emissions would be generated by these activities. The three mitigation measures listed on page 32 do not demonstrate that the proposed project’s construction emissions would be reduced to less than significance.

Similarly, the lead agency has not quantified operational emissions from the proposed project. Emissions during operation would be generated by maintenance workers traveling to the site and/or emissions from the generator set during commissioning, testing, or power outages.

Please note that without quantifying the proposed project’s air quality impacts, the lead agency has not demonstrated that the proposed project’s air quality impacts are not significant. To calculate potential adverse air quality impacts from the proposed project, the SCAQMD recommends that the lead agency use either the emissions calculation methodologies in the 1993 SCAQMD CEQA Air Quality Handbook or use the current version of the California Air Resources Board (CARB)-approved computer model URBEMIS 2002, which is available on the SCAQMD website: www.aqmd.gov/ceqa/models.html. If quantification of emissions reveals that project emissions exceed the established significance thresholds, then mitigation measures must be required by the lead agency to reduce those emissions to less than significance.