



# 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:

April 4, 2018

[EMWD\\_Comments@helixepi.com](mailto:EMWD_Comments@helixepi.com)

Eastern Municipal Water District

Attn: Susan Ahn, Principal Water Resource Specialist

PO Box 8300

Perris, CA 92572

## Mitigated Negative Declaration (MND) for the Fox Tank 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 demolish the existing 1.5-million gallon (MG) tank, and construction of a 1.0-MG tank, a 0.15-MG detention basin, and a pipeline of 12 inches in diameter on 3.35 acres (Proposed Project). Construction is expected to take approximately 24 months<sup>1</sup>. Based on a review of aerial photographs in the MND, SCAQMD staff found that the Proposed Project is located in proximity to rural single-family residences<sup>2</sup>.

### SCAQMD Staff's Summary of Air Quality Analysis

In the Air Quality Analysis Section, the Lead Agency quantified the Proposed Project's construction and operation emissions and compared them to SCAQMD's regional and localized air quality CEQA significance thresholds. The Lead Agency found that the Proposed Project's air quality impacts would be less than significant.

### SCAQMD Staff's Comments

The Lead Agency is committed to implementing a number of project design features (PDFs) to minimize impacts during construction. One of the PDFs for air quality is to use California Air Resources Board (CARB)/United States Environmental Protection Agency (USEPA) Certification Tier 2 or better engines, or other equivalent methods approved by CARB, to reduce air emissions<sup>3</sup>. SCAQMD staff recommends that the Lead Agency require the use of Tier 4 emissions standards for off-road diesel-powered construction equipment with more than 50 horsepower and incorporate the following changes in the Final MND.

- Off-road construction equipment engines of more than 50 horsepower would utilize California Air Resources Board (CARB)/United States Environmental Protection Agency (USEPA) Certification Tier ~~2~~ or better 4 engines, or other equivalent methods approved by CARB, to reduce air emissions. Include this project design feature as a bid or contract specification with contractors. Require periodic reporting and provisions of written documents by contractors to prove and ensure compliance.

In the event that implementation of the Proposed Project requires a permit from the SCAQMD, the SCAQMD should be identified as a Responsible Agency for the Proposed Project in the Final MND. For

<sup>1</sup> MND, Page 16.

<sup>2</sup> MND, Page 3.

<sup>3</sup> MND, Page 7.

more information on permits, please visit SCAQMD webpage at: <http://www.aqmd.gov/home/permits>. Questions on permits can be directed to SCAQMD's Engineering and Permitting staff at (909) 396-3385.

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 to the public who are interested in the Proposed Project.

SCAQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact me at [lsun@aqmd.gov](mailto:lsun@aqmd.gov) if you have any questions.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS  
RVC180309-07  
Control Number