



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Mitigated Negative Declaration (MND) for the Proposed Diamond Regional Sewer Lift Station and Dual Force Mains

South Coast Air Quality Management District (South Coast AQMD) 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.

South Coast AQMD Staff's Summary of Project Description

The Lead Agency proposes to construct 3,400 linear feet of pipelines of 16 inches and 24 inches in diameters to collect raw wastewater and then pump the sewage to an existing junction structure near the corner of East Lakeshore Drive and Elm Street (Proposed Project). Construction of the Proposed Project is expected to last approximately 18 months¹.

South Coast AQMD Permits and Consultation

Construction equipment anticipated for the Proposed Project would include a crane, excavator, concrete saw, roller, loader, microtunneling boring machine and other surface equipment². It is important to note that operation of portable engines and portable equipment units of 50 horsepower (hp) or greater that emit particulate matter require a permit from South Coast AQMD or register with the Portable Equipment Registration Program (PERP) through the California Air Resources Board (CARB)³. The Lead Agency should consult with South Coast AQMD's Engineering and Permitting staff to determine if operation of any construction equipment will require a South Coast AQMD permit or if it will need to be registered under the PERP through CARB⁴. If a permit from South Coast AQMD is required, South Coast AQMD should be identified as a Responsible Agency for the Proposed Project in the Final MND. Any assumptions used in the Air Quality Analysis in the Final MND will be used as the basis for permit conditions and limits for the Proposed Project. Should there be any questions on permits, please contact the South Coast AQMD's Engineering and Permitting staff at (909) 396-3385. For more general information on permits, please visit South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>. For more information on the PERP Program, please contact CARB at (916) 324-5869 or visit CARB's webpage at: <https://ww2.arb.ca.gov/our-work/programs/portable-equipment-registration-program-perp>.

Conclusion

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 South Coast AQMD with written responses to all comments contained herein

¹ MND. Page 6.

² *Ibid.*

³ South Coast Air Quality Management District. *Portable Equipment Registration Program (PERP)*. Accessed at: <http://www.aqmd.gov/home/permits/equipment-registration/perp>.

⁴ *Ibid.*

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, informative, or useful to decision makers and the public who are interested in the Proposed Project.

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 me at lsun@aqmg.gov, should you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS
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