



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 Meridian Trunk Sewer Improvement Project

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 and Air Quality Analysis

The Lead Agency proposes to construct 8,600 linear feet of sewer pipeline that will be 24 to 36 inches in diameter with a total soil disturbance of 7.85 acres (Proposed Project). The Proposed Project is located parallel to and west of Interstate 215 between the sewer lift station at the Meridian Business Park and the Western Municipal Water District treatment plant. Construction of the Proposed Project is expected to last four months, beginning in March of 2019¹. In the Air Quality Analysis section, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared those emissions to SCAQMD's recommended regional and localized air quality CEQA significance thresholds. Based on the analyses, the Lead Agency found that the Proposed Project's construction and operational air quality impacts would be less than significant².

General Conformity Review Request and Determination

In the Air Quality Analysis, the Lead Agency conducted a review of the Proposed Project's emissions to determine if the Proposed Project would be subject to the General Conformity requirement of the Clean Air Act. The Lead Agency quantified the Proposed Project's construction emissions and compared those emissions to the de minimis thresholds. Based on the analysis, the Lead Agency found that the Proposed Project's construction emissions were not expected to exceed General Conformity de minimis thresholds³. Additionally, the Lead Agency found that the Proposed Project's operations are within the scope of federal actions that are exempt from General Conformity review and determination, and no further analysis of operational emissions is required⁴.

The Clean Air Act requires that federal agencies undergo a General Conformity review and determination process in order to demonstrate that emissions from a proposed federal action will not interfere with a state or tribal implementation plan (SIP/TIP) for an area that has been designated by the United States Environmental Protection Agency (U.S. EPA) as a nonattainment or maintenance area for a National Ambient Air Quality Standard (NAAQS). The conformity determination process is intended to demonstrate that a proposed Federal action will not: (1) cause or contribute to new violations of a NAAQS; (2) interfere with provisions in the applicable SIP for maintenance of any NAAQS; (3) increase

¹ MND. Section III Air Quality. Page 17.

² *Ibid.* Pages 16 – 22.

³ MND. Section III Air Quality. Pages 17-18.

⁴ *Ibid.*

the frequency or severity of existing violations of any standard; or (4) delay the timely attainment of any standard⁵.

The South Coast Air Basin (Basin) is designated as extreme non-attainment for ozone and serious non-attainment for PM_{2.5}. To streamline the review process and to facilitate conformity determinations for projects in the Basin, two separate VOC and NO_x general conformity budgets were established in the Final 2012 AQMP: 1 tons per day (tpd) of NO_x and 0.2 tpd of VOC were set aside for this purpose every year, starting in 2013 until 2030. SCAQMD has set up a tracking system for projects requiring conformity determinations on a first-come-first-serve basis, whereby the project emissions are debited from the applicable set aside accounts until they are depleted. In the event that the Lead Agency has any questions related to the SCAQMD General Conformity review process and determination, the questions can be directed to Ms. Sang-Mi Lee, Program Supervisor, at slee@aqmd.gov.

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 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, informative, or useful to decision makers and 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 Alina Mullins, Assistant Air Quality Specialist, at amullins@aqmd.gov or (909) 396-2402, should you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

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Planning, Rule Development & Area Sources

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⁵ United States Environmental Protection Agency. *General Conformity*. Accessed at: <https://www.epa.gov/general-conformity/what-general-conformity>.