



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 Riverside Highland Water Company Well Development 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

The Lead Agency proposes to construct 2,700 linear feet of pipeline of 12 inches in diameter on 1.5 acres (Proposed Project). The Proposed Project is located at 800 East Washington Street on the southeast corner of RV Center Drive and East Washington Street in the City of Colton. Construction of the Proposed Project is expected to last approximately 140 days, with a 40-day casing and well drilling period¹.

SCAQMD Permits

Upon a review of the MND and the CalEEMod output files, SCAQMD staff found that, during the casing and well drilling phase of construction, a 221-horsepower (hp) bore/drill rig would be used². It is important to note that generally, operation of portable engines and portable equipment units of 50 hp or greater that emit particulate matter require a permit from SCAQMD or registration with the Portable Equipment Registration Program (PERP) through the California Air Resources Board (CARB)³. The Lead Agency should consult with SCAQMD's Engineering and Permitting staff to determine if operation of the 221-hp bore/drill rig will require a SCAQMD permit or if it will need to be registered under the PERP through CARB⁴. If a permit from SCAQMD is required, SCAQMD 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 SCAQMD's Engineering and Permitting staff at (909) 396-3385. For more general information on permits, please visit SCAQMD'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

¹ MND. Evaluation of Environmental Impacts, Section III. Air Quality. "Table III-4 CalEEMod Construction Activity Equipment Fleet and Workdays". Page 20.

² *Ibid.* Page 20; CalEEMod Output File – Summer, "3.0 Construction Detail". Page 7 of 19.

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.*

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.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

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