



South Coast Air Quality Management District

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Draft Mitigated Negative Declaration (Draft MND) for the Proposed Leo J. Vander Lans Water Treatment Facility Expansion Project

The South Coast Air Quality Management District (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 CEQA document.

In the project description, the lead agency proposes the expansion of the existing Leo J. Vander Lans Water Treatment Facility (LVLWTF) to increase recycled water production from 3 to 8 million gallons per day. The expansion would occur on the exiting 4-acre site and last 14 to 20 months starting in late-2012.

In the Air Quality Section, the lead agency quantified the project's construction and operation air quality impacts and has compared those impacts with the AQMD's recommended regional daily significance thresholds. Although project localized air quality impacts for construction of this project are not likely significant, these impacts should be quantified in future projects to demonstrate that sensitive receptors are not adversely affected. It is noted that sensitive receptors (residences) are located within a quarter mile east of the project site. AQMD guidance for performing a localized air quality analysis can be found on the AQMD web page.¹ Should the lead agency conclude after its analyses that localized air quality impacts exceed the AQMD daily significance thresholds, staff has compiled mitigation measures in addition to any measures proposed by the lead agency. These measures can be implemented if the air quality impacts are determined to be significant.²

In the Final Negative Declaration, the lead agency should include a discussion of cumulative impacts considering that the proposed project's construction activities may occur during the same period that related activities are planned for what appears to be a closely related project. The Orange County Water District is proposing to construct the

¹ <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>

² http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html

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seemingly related Alamitos Barrier Improvement Project (State Clearinghouse #2012031027) that may use the water produced from the expanded LVLWTF. If these projects' construction periods overlap, discussion of potential air quality impacts from these overlapping, related activities should be included in the Final CEQA document.

Please provide the AQMD staff with written responses to all comments contained herein prior to the adoption of the Final ND. The AQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,



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IM:GM

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