SENT VIA E-MAIL AND USPS:

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Mitigated Negative Declaration (MND) for the Lakeview Pipeline Repair 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. In the project description, the Lead Agency proposes to reline Lakeview Pipeline (LVP) with a steel pipe liner. Access sites would be established at a maximum of 23 locations along the LVP alignment. The pipeline would be excavated, sections of the existing pipeline removed, and the liner inserted and pushed through the pipeline in segments.

Based on a review of the Draft MND the Lead Agency determined that the projects construction emissions would not exceed regional thresholds and as such, the impacts were concluded to be less than significant. While, the project description and air quality analysis assumes overlapping phases and emissions, Table III-1 only summarizes the emissions in incremental phases without clearly indicating which overlapping phases will result in the peak daily emissions. SCAQMD staff recommends clarifying the Draft MND to provide additional details in the air quality analysis and project description with regards to the overlapping phases.

Additionally, the Lead Agency anticipates the use of portable construction equipment such as air compressors, generators, welders, and dewatering pumps. SCAQMD staff would also like to remind the Lead Agency that portable construction equipment requires a stationary SCAQMD permit if the operator plans to have equipment remain onsite for longer than 12 months.

The SCAQMD staff is available to work with the Lead Agency to address these concerns and any other air quality questions that may arise. Please contact Jack Cheng, Air Quality Specialist at (909) 396-2448, if you have any questions regarding these comments.

Sincerely,

Barbara Radlein

Barbara Radlein Program Supervisor Planning, Rule Development & Area Sources July 1, 2015

BR:JC RVC150605-01 Control Number