



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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Mitigated Negative Declaration (MND) for the Proposed Steeplechase and Kalmia Booster Pump Station Project (Proposed Project)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to review the above-mentioned document. Eastern Municipal Water District is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff has provided a brief summary of the project information and prepared the following comment.

South Coast AQMD Staff's Summary of Project Information in the MND

Based on information provided in the MND, the Proposed Project consists of construction and operation of a new booster pump station (BPS) and 1,209 linear feet of 12-inch pipeline on an approximately .5-acre site.^{1,2} The new BPS will replace an existing BPS located at 11515 Steeplechase Drive, Moreno Valley.³ The current capacity of the existing BPS is not sufficient to meet future potable water needs in the area and thus the Proposed Project is meant to provide increased system capacity to accommodate planned growth.⁴ Specifically, the new BPS will be equipped with two turbine pumps with enough room to accommodate a future third pump.⁵ Each pump will have a 75-horsepower electric motor.⁶ The Proposed Project also consists of an emergency standby power generator (diesel engine).⁷ The Proposed Project is situated on the Eastern Municipal Water District's existing Kalmia Avenue tank site, which is adjacent to single-family homes. The Proposed Project is located near the southwest corner of Kalmia Avenue and Kayal Avenue in the city of Moreno Valley, Riverside County. Construction of the Proposed Project is estimated to last 20 months.⁸

South Coast AQMD Staff's Comments on the MND

South Coast AQMD Air Permits and Role as a Responsible Agency

Operation of the Proposed Project will require a South Coast AQMD air permit for an emergency generator.^{9, 10, 11} If implementation of the Proposed Project requires the use of new stationary sources,

¹ MND. Page 6.

² *Ibid.* Appendix B Air Quality CalEEMod Emission Calculation Output, RECON Environmental, Inc. PDF Page 2.

³ *Ibid.* Page 6.

⁴ *Ibid.* Page 6.

⁵ *Ibid.* Page 12.

⁶ *Ibid.* Page 12.

⁷ *Ibid.* Page 12.

⁸ *Ibid.* Page 12.

⁹ *Ibid.* Page 14.

¹⁰ *Ibid.* Page 23.

¹¹ *Ibid.* Appendix B Air Quality CalEEMod Emission Calculation Output, RECON Environmental, Inc. PDF Page 26.

including but not limited to emergency generators, fire water pumps, boilers, etc., air permits from South Coast AQMD will be required and the role of South Coast AQMD would change from a Commenting Agency to a Responsible Agency under CEQA. In addition, if South Coast AQMD is identified as a Responsible Agency, per CEQA Guidelines Sections 15086, the Lead Agency is required to consult with South Coast AQMD. Furthermore, CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of evaluating the applications for air permits. For these reasons, the Final MND should include a discussion about any new stationary equipment requiring South Coast AQMD air permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project. Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions regarding what types of equipment would require air permits. For more general information on permits, please visit South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>.

Conclusion

The Lead Agency is recommended to revise the CEQA analysis to address the aforementioned comments and provide the necessary evidence to sufficiently support the conclusions reached. If the requested information and analysis are not included in the final CEQA document, either the Final MND or other type of CEQA document, the Lead Agency should provide reasons for not doing so. Pursuant to California Public Resources Code Section 21092.5(b) and 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 and notify each public agency when any public hearings are scheduled. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided. In addition, if the Lead Agency decides to adopt the Final MND, please provide South Coast AQMD with a notice of any scheduled public hearing(s).

Thank you for the opportunity to provide comments. 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 Evelyn Aguilar, Air Quality Specialist, at eaguilar@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

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Planning, Rule Development & Implementation

SW:EA

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