



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

March 6, 2019

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Mitigated Negative Declaration (MND) for the Proposed Syphon Reservoir Geotechnical Investigations 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 conduct a geotechnical study consisting of 53 borings, 16 exploratory test pits, three fault evaluation trenches (1,900 feet), five seismic refraction survey lines (7,400 feet), and four electrical resistivity survey lines (2,900 feet)¹ on four acres² (Proposed Project). The objective of the Proposed Project is to characterize the geologic and geotechnical subsurface conditions and dam foundation of the reservoir for future dam expansion. The Proposed Project is located on the northwest corner of the State Route 241 (SR-241) and State Route 133 (SR-133) interchange in unincorporated County of Orange. The Proposed Project is expected to occur over 125 days.

SCAQMD Permits

The Proposed Project may include the use of equipment that requires a permit for operation. It is recommended that the Lead Agency consult with SCAQMD's Engineering and Permitting staff to determine if operation of any of the proposed equipment expected to be used throughout the duration of the study will require a permit from SCAQMD or if the equipment will need to be registered under the Portable Equipment Registration Program (PERP) through the California Air Resources Board (CARB)³. 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 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 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

¹ MND. Page 6.

² MND. Page 34.

³ South Coast Air Quality Management District. *Portable Equipment Registration Program (PERP)*. Accessed at: <http://www.aqmd.gov/home/permits/equipment-registration/perp>.

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 Robert Dalbeck, Assistant Air Quality Specialist, at RDalbeck@aqmd.gov or (909) 396-2139, should you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS:RD
ORC190208-03
Control Number