



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 Lake Forest Zone B to C Pump Station Project (Proposed Project)

South Coast Air Quality Management District (South Coast 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 MND.

The Lead Agency proposes to demolish an existing water pump station, and build a 1,791-square-foot water pump station with a capacity of 2,250 gallons per minute and a water management intertie system on 0.41 acres (Proposed Project). Based on a review of the MND and supporting technical documentation, South Coast AQMD staff found that the Proposed Project would include the use of one standby emergency generator with a diesel engine of 315 brake horsepower (bhp). However, the Lead Agency did not identify South Coast AQMD as a Responsible Agency for the standby emergency generator in the MND. Internal combustion engines with a manufacturer's rating of greater than 50 bhp require permits from South Coast AQMD. Therefore, the Lead Agency should identify South Coast AQMD as a Responsible Agency for the Proposed Project in the Final MND (CEQA Guidelines Section 15381). Impacts from the permits need to be fully and adequately evaluated and disclosed as required under CEQA Guidelines Section 15096(b). The assumptions in the air quality analysis in the Final MND will be used as the basis for evaluating the permits under CEQA and imposing permit conditions and limits. Questions on permits should be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

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 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, responses 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. Please contact me at lsun@aqmd.gov, should you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS

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