



South Coast Air Quality Management District

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October 10, 2002

Ms. Victoria Whitney
Program Manager
Hearings and Special Projects Section
Division of Water Rights
State Water Resources Control Board
P.O. Box 2000
Sacramento, CA 95812-2000

Dear Ms. Whitney:

Comments on Imperial Irrigation District and San Diego County Water Transfer Agreement

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the State Water Resources Control Board's (SWRCB) proposed draft order regarding the Imperial Irrigation District (IID) and the San Diego County Water Authority (SDCWA) water transfer agreement.

SCAQMD is the agency responsible for air quality monitoring and improvement in the Salton Sea Air Basin (SSAB) portion of Riverside County. This area, also referred to as the Coachella Valley, includes the northern shores of the Salton Sea and is classified by the U.S. EPA as a serious PM10 (particulate matter with an aerodynamic diameter of 10 microns or less) non-attainment area. Most of the ambient PM10 is from local fugitive dust sources, but transport from the southwestern U.S. (including the Salton Sea and other Imperial County areas) does contribute to overall PM10 levels in Coachella Valley. The SCAQMD recently approved a new and more stringent PM10 air quality plan to ensure that PM10 health standards are met as soon as possible. Full implementation of that plan's Most Stringent Measures on all local sources of fugitive dust demonstrates attainment of the PM10 health standards with very little margin of safety. Additional contributions of PM10 from the Salton Sea area (e.g., further exposed seabed) could threaten the attainment status of the Coachella Valley. Failure to attain or maintain the federal PM10 standards could result in mandatory emission reductions from local sources that are already controlled at the most stringent level, or sanctions and potential loss of transportation funds.

While the SCAQMD is supportive of the various measures proposed in the Final Environmental Impact Report for the IID Water Conservation and Transfer Project to mitigate future fallow agricultural parcels (e.g., Best Management Practices) and shoreline exposure (four step evaluation and mitigation plan), we are concerned about the long-term air quality impacts resulting from the proposed project. In particular, the SCAQMD is concerned that the SWRCB's draft order (p. 76)

implies that full mitigations for certain impacts only need to be mitigated for 15 years and declares that any impacts after 15 years are, by definition, unmitigable. Presuming this 15 year limit also applies to air quality impacts, it is unclear what agency would determine if further impacts are unmitigable. Given the tenuous Coachella Valley PM10 attainment status, the SCAQMD believes that any agreement should require the continuing development and implementation of measures to mitigate potential air quality impacts from shoreline exposure. Air quality impacts could continue long after the water transfer ends, especially if mitigations are discontinued. The SCAQMD also has concerns with any agreement that removes the responsibility for this mitigation from any party. As demonstrated in the Owens Valley, windblown PM10 emissions from shoreline exposure are considered an anthropogenic source and cannot be excluded under the U.S. EPA's Natural Events Policy unless Best Available Control Measures are implemented. Excluding parties from responsibility to mitigate continuing emission sources resulting from transfer could shift that responsibility to sources in the Coachella Valley, since under the Clean Air Act, the Coachella Valley must attain and maintain the PM10 standards. As mentioned previously, these sources would already be mitigating their emissions with Most Stringent Measures.

If you have any questions regarding these comments, please contact Dr. Julia Lester of my staff at (909) 396-3162.

Sincerely,



Elaine Chang, DrPH.
Deputy Executive Officer

LT:ZP:JCL

cc: S. Roy Wilson, Ed.D., Riverside County Supervisor
Patricia A. Larson, Executive Director, Coachella Valley Association of Governments
Tom Kirk, Executive Director, Salton Sea Authority