



# South Coast Air Quality Management District

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October 24, 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:

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

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to provide additional comments 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. The following comments, which supplement those presented in my October 10, 2002 letter, are based solely on the revisions to the draft order subsequent to October 16, 2002.

As discussed in my letter of October 10, 2002, 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. Environmental Protection Agency 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 for the Coachella Valley to demonstrate attainment with health-based PM10 air quality standards. Any additional contributions of PM10 from the Salton Sea area could seriously threaten the attainment status of the Coachella Valley since full implementation of the PM10 air quality plan demonstrates attainment of the PM10 health standards with very little margin of safety. Failure to attain or maintain the federal PM10 standards could result in federally mandated emission reductions from local sources or sanctions and potential loss of federal transportation funds.

We commend the plan which would start a research and monitoring program within six months of a transfer agreement. However, we are greatly concerned that, as currently proposed, only Imperial County Air Pollution Control District and the California Air Resources Board are given the authority to comment on the feasibility of air quality impact mitigation measures. The North Salton Sea is in SCAQMD jurisdiction and emissions from this source impact the Coachella Valley serious non-attainment area. Therefore, the SCAQMD should also be considered a responsible air quality agency for this project, and we insist that SCAQMD be included on any decisions related to air quality impact mitigation feasibility determination, as indicated in the SCAQMD's May 5, 2000 comment letter on the Draft Environmental Impact Report/Statement.

Additionally, while the SCAQMD is supportive of the various measures proposed in the Final Environmental Impact Report/Statement 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. The SCAQMD staff believes that any water transfer agreement should require the continuing development and implementation of measures to mitigate potential air quality impacts from shoreline exposure and include periodic re-evaluation of the effectiveness and adequacy of air quality-related mitigation measures. The information provided in the draft order and Environmental Impact Report/Statement does not clearly make the case that the potentially significant PM10 emissions from shoreline exposure are unavoidable. Mitigation measures for fugitive dust can and should be implemented for the life of the project and beyond to reduce potential impacts to insignificant levels or to the greatest extent feasible. To terminate mitigation measures during the life of the project is inconsistent with the requirements of CEQA. The SCAQMD staff seeks to assist SWRCB and other stakeholders in developing and implementing feasible mitigation for the potential air quality impacts of the proposed project.

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:JDN

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