

*District Mission:
Dedicated to Satisfying
our Community's
Water Needs*

September 12, 2012

Dr. Barry Wallerstein
Executive Officer
South Coast Air Quality Management District
21865 Copley Dr.
Diamond Bar CA 91765

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RE: Comments to the 2012 Draft Air Quality Management Plan

Dear Dr. Wallerstein,

Mesa Consolidated Water District (Mesa Water) appreciates the opportunity to submit comments on the draft 2012 Air Quality Management Plan (AQMP).

Mesa Water provides water service to an 18-square-mile area that includes most of Costa Mesa, parts of Newport Beach, and portions of unincorporated Orange County, including John Wayne Airport. A coalition of Orange County water and wastewater agencies, lead by the Association of California Cities – Orange County (ACC-OC) has developed a list of common concerns and suggested improvements regarding the AQMP from the perspective of local governments.

In general, Mesa Water agrees with the issues and suggestions for improvement raised by the coalition regarding the draft AQMP and its potential negative impacts on the local government community and the economy as a whole. Some of the major points of concern are listed described below:

1. **Complete an economic analysis as part of the draft AQMP.** This multi-year, regional plan will cost hundreds of millions of dollars to implement and will have significant negative cost impacts on government agencies. At all times, and particularly when municipal budgets are being raided by the state and property and sales tax revenue is low, AQMD should make a concerted effort to identify the potential economic impacts of its plans prior to broad distribution.
2. **The comment period should reflect the significant delay of an economic study.** Due to a lack of an economic impact study, AQMD should significantly extend any comment period following the release of the full economic impact analysis. We understand the constraints imposed by state, federal and other timelines; nonetheless, it would be irresponsible of the AQMD to move forward with this plan without a complete economic analysis.
3. **Ozone Implementation Measures should be included as an appendix or removed from the draft AQMP.** Ozone targets are more than a decade away and implementation measures are not required as part of the 2012 AQMP.

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4. **FUG-01 will unintentionally harm cities and local governments without realizing measurable results.** FUG-01 has a stated purpose of expanding AQMD's regulation of vacuum trucks into the petroleum industry. Numerous cities, water, and sanitation districts operate these trucks on a limited basis to comply with State Water Resources Control Board Order No. R3-2006-0003-DWQ, Statewide General Waste Discharge Requirements for Sanitary Sewer Overflows (SSOs). These trucks are essential to preventing hazardous wastewater from overflowing onto public streets and into homes, businesses, natural habitats and eventually into the ocean. Additional regulation and required retrofits would add considerable costs to already heavily burdened local agencies and achieve limited emissions reductions due to the relatively limited operating hours of these vehicles. Therefore, we request that local governments be exempted from FUG-01.
5. **The AQMP ought to focus on a philosophy of "do no fiscal harm."** AQMD and other air quality districts have been tremendously successful over the past decades in reducing air pollution. The air in the South Coast Basin is cleaner now than it was 40 years ago and with many more people and cars (the major source of emissions that dwarfs all others.). Nevertheless, when cities and local governments are suffering through the reduced revenue results of the great recession, now is not the time to "tinker at the edges." Developing a cost per ton of pollutants removed measure would go a long way to providing clarity in rule making and long term planning.

Local governments are in a unique position to understand the dynamic and difficult task the AQMD has with the preparation of the AQMP, and we can appreciate your challenge. Building consensus around regional public policy is a difficult endeavor. Therefore, we believe that several steps could be taken to mitigate potential issues with the draft plan including an **unrelenting focus on economic impacts and the adoption of a "do no fiscal harm" philosophy.**

Thank you again for the chance to provide comments and please feel free to contact us any time.

Sincerely,



Fred R. Bockmiller, Jr., P.E.
Mesa Water Board President

Cc: Mesa Water Board of Directors
Paul E. Shoenberger, P.E., Mesa Water General Manager
Steve Greyshock, Vice President, 21Strat (on behalf of ACC-OC)