



South Coast Air Quality Management District

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E-Mailed: August 12, 2104

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August 12, 2014

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California State Lands Commission
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Review of the Revised Analysis of Public Trust Resources and Values for the Proposed Broad Beach Restoration Project

The 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 California State Lands Commission (Lead Agency) and should be incorporated into the final Revised Analysis of Impacts to Public Trust Resources and Values (Environmental Document) as appropriate.

Based on a review of the Environmental Document the Lead Agency determined that the proposed project will exceed the SCAQMD's California Environmental Quality Act (CEQA) regional and localized significance thresholds. Specifically, the air quality analysis demonstrated that the proposed project will exceed the SCAQMD's CEQA regional construction significance thresholds for NOX, VOCs and CO. Additionally, the air quality analysis determined that the project will exceed the SCAQMD's CEQA localized construction significance threshold for NOX. These regional and localized impacts are primarily a result of substantial on-road diesel truck trips (i.e., 420 diesel truck trips per day) and off-road construction equipment activity required for the proposed project. Therefore, the SCAQMD staff recommends that the Lead Agency require the following additional avoidance and minimization measure (AMM) in the final Environmental Document.

Additional Construction Avoidance and Minimization Measures

- Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export) and if the lead agency determines that 2010 model year or newer diesel trucks cannot be obtained the lead agency shall use trucks that meet EPA 2007 model year NOx emissions requirements.

Further, the SCAQMD staff recommends that the Lead Agency replace the third and fourth bullets of AMM AQ-1c with the following:

Revised Construction Avoidance and Minimization Measures

- Project start, to December 31, 2014: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 3 offroad emissions standards. In

addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

- Post-January 1, 2015: All offroad diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

Also, based on the project description (Chapter 2.0) provided in the Environmental Document it does not appear that the proposed project will require any discretionary approval from the SCAQMD, therefore, the requirements set forth in AMM AQ-1a appear to be unnecessary and could jeopardize timely implementation of the proposed project. As a result, SCAQMD staff recommends that AMM AQ-1a be removed from the final Environmental Document.

The SCAQMD's comments are guidance to agencies to ensure the air quality analysis in the Environmental Document is complete and technically correct. Where appropriate the SCAQMD has provided additional guidance regarding measures to further minimize air quality impacts. The SCAQMD staff recommends that measure AMM AQ-1a be removed since it will not result in actions to further minimize air quality impacts.

Response/Staff Contact

The SCAQMD staff requests that the Lead Agency provide the SCAQMD staff with written responses to all comments contained herein prior to the adoption of the final Environmental Document. Further, staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,



Ed Eckerle
Program Supervisor
Planning, Rule Development & Area Sources

SN:EE:DG

LAC140722-02
Control Number