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SENT VIA E-MAIL AND USPS:
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July 12, 2017

Draft Supplemental Environmental Impact Report (Draft SEIR) for the Proposed Seawater Desalination Project at Huntington Beach (SCH No.: 2001051092)

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 Lead Agency and should be incorporated into the Final Supplemental EIR.

Project Description and Air Quality Analysis

The proposed project consists of the modification to the existing Huntington Beach Generating Station Once Through Cooling (Poseidon OTC) seawater intake and discharge pipelines ("proposed project"). The proposed project includes two "technology enhancements" at the desalination facility: 1) the installation of a wedgewire screen at the end of the intake line, and 2) installation of a multiport diffuser on the offshore end of the outfall. Additionally, the proposed project will reduce seawater intake volume from 152 million gallon per day (MGD) that was approved in the 2010 Final Subsequent EIR (2010 Project Volume) to 106.7 MGD[1]. In the Air Quality section, the Lead Agency found that the proposed project would exceed SCAQMD's regional air quality CEQA significance thresholds for NOx during construction. After incorporating Mitigation Measure CON-10 through CON-14[2], the Lead Agency found that the proposed project's construction air quality impacts from NOx emissions would remain significant and unavoidable.

SCAQMD's 2016 Air Quality Management Plan

On March 3, 2017, the SCAQMD's Governing Board adopted the 2016 Air Quality Management Plan (2016 AQMP), which was later approved by the California Air Resources Board of Directors on March 23rd. The 2016 AQMP[3] is a regional blueprint for achieving air quality standards and healthful air in the South Coast Air Basin (Basin). Built upon the progress in implementing the 2007 and 2012 AQMPs, the 2016 AQMP provides a regional perspective on air quality and lays out the challenges facing the Basin. The most significant air quality challenge in the Basin is to reduce an additional 45 percent reduction in NOx emissions in 2023 and an additional 55 percent reduction in NOx emissions beyond 2031 levels for ozone attainment.

Achieving NOx emission reductions in a timely manner is critical to attaining the National Ambient Air Quality Standard (NAAQS) for ozone before the 2023 and 2031 deadlines. SCAQMD is committed to attain the ozone NAAQS as expeditiously as practicable. To further reduce construction emissions from NOx, SCAQMD staff recommends changes to the existing Mitigation Measure (MM) CON-11 (Hauling Activities) and MM CON-14 (Diesel Fuel Reduction Plan) that were adopted in the Mitigation Monitoring Plan for the 2010 Final Subsequent EIR. Please see the attachment for more information.

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[1] Draft SEIR. Page ES-4.
[2] *Ibid*. Page 4-85.
[3] South Coast Air Quality Management District. March 3, 2017. *2016 Air Quality Management Plan*. Accessed at: http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan.

Pursuant to the California Public Resources Code Section 21092.5 and the CEQA Guidelines Section 15088, SCAQMD staff requests that the Lead Agency provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Supplemental EIR. Further, when the Lead Agency makes the finding that the recommended mitigation measures are infeasible, the Lead Agency shall describe the specific reasons for rejecting them in the Final Supplemental EIR (CEQA Guidelines Section 15091).

SCAQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Jack Cheng, Air Quality Specialist, CEQA IGR Section, at (909) 396-2448, if you have any questions regarding the enclosed comments.

Sincerely,

Lijin Sun

Lijin Sun, J.D.
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources

Attachment
LS:JC
ORC170530-02
Control Number

ATTACHMENT

Recommended Changes to the Existing Mitigation Measures CON-11 and CON-14

1. CEQA requires that all feasible mitigation measures go beyond what is required by law to minimize any significant impacts. To further reduce the significant construction impacts from NOx emissions, SCAQMD staff recommends revisions to the Mitigation Measure (MM) CON-11 and MM CON-14 that the Lead Agency should include in the Final Supplemental EIR. Additional information on potential mitigation measures as guidance to the Lead Agency is available on the SCAQMD CEQA Air Quality Handbook website[4]

Mitigation Measure CON-11 (Hauling Activities):

- All trucks that are to haul excavated or graded material on site shall comply with California Vehicle Code Section 23114(b)(F)(e)(4) as amended, regarding the prevention of materials spilling onto public streets and roads. Require the use of 2010 model year diesel haul trucks that conform to 2010 EPA truck standards or newer diesel haul trucks (e.g., material delivery trucks and soil import/export) for hauling activities, and if the Lead Agency determines that 2010 model year or newer diesel haul trucks cannot be obtained, the Lead Agency shall use trucks that meet EPA 2007 model year NOx emissions requirements, at a minimum. Additionally, consider other measures such as incentives, phase-in schedules for clean trucks, etc. during the construction period. Prior to the issuance of grading permits, the applicant shall demonstrate to the City of Huntington Beach Engineer how the project operations subject to that specification during hauling activities shall comply with the provision set forth in Sections 23114(b)(F)(e)(4).

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Mitigation Measure CON-14 (Diesel Fuel Reduction Plan):

- Use diesel powered equipment meeting Tier ~~2~~ 4 CARB/U.S. EPA emission standards. ~~or higher emissions standards to the maximum extent feasible.~~ If not already supplied with a factory-equipped diesel particulate filter, all off-road diesel-powered construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emission 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. In addition, construction equipment shall incorporate, where feasible, emissions savings technology such as hybrid drives and specific fuel economy standards. In the event that all off-road diesel-powered construction equipment cannot meet the Tier 4 engine certification, the applicant shall use alternative measures, which include, but would not be limited to, reduction in the number and/or horsepower rating of construction equipment, limiting the number of daily construction haul truck trips to and from the proposed project, using cleaner vehicle fuel, and/or limiting the number of individual construction project phases occurring simultaneously. The effectiveness of alternative measures must be demonstrated through future study with written findings supported by substantial evidence that is approved by the Lead Agency before use.

[4] South Coast Air Quality Management District. Accessed at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook.