



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Draft Environmental Impact Report (DEIR) for the Proposed Santa Ana River Conservation and Conjunctive Use Program Project (SCH No.: 2016101079)

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 EIR.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to construct groundwater production and extraction wells, pipelines, pump stations, and ancillary facilities, and install groundwater treatment systems to provide 70,439 acre-feet per year of new, local dry-year water supply (Proposed Project). The Proposed Project is located within the Santa Ana River Watershed along the cities of Corona, Eastvale, Norco, Jurupa Valley, and Riverside.

SCAQMD Staff's Summary of Air Quality Analysis

In the Air Quality Analysis section, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared those emissions to SCAQMD's recommended regional and localized air quality CEQA significance thresholds. The Lead Agency also quantified the Proposed Project's construction emissions from overlapping construction phases. Unmitigated overlapping construction phases would generate 160.85 pounds per day (lbs/day) of NO_x on a peak day¹. By incorporating Mitigation Measure (MM) AIR-1, which requires that construction equipment greater than 50 horsepower (hp) meet EPA/CARB Tier 3 emissions standards at a minimum and Tier 4 where available, overlapping construction phases would generate 99.30 lbs/day², which is slightly below SCAQMD's air quality CEQA significance threshold for NO_x during construction (100 lbs/day). As such, the Lead Agency found that the Proposed Project's air quality impacts from construction would be less than significant after mitigation.

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)³, which was later approved by the California Air Resources Board on March 23, 2017. Built upon the progress in implementing the 2007 and 2012 AQMPs, the 2016 AQMP provides a regional perspective on air quality and the challenges facing the South Coast Air Basin. The most significant air quality challenge in the Basin is to achieve an additional 45 percent reduction in nitrogen oxide (NO_x) emissions in 2023 and an additional 55 percent NO_x reduction beyond 2031 levels for ozone attainment.

¹ Draft EIR. Chapter 4.3. Page 23.

² *Ibid.* Page 24.

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>.

SCAQMD Staff's General Comments

As described in the 2016 AQMP, achieving NOx emissions 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 attaining the ozone NAAQS as expeditiously as practicable. While MM AIR-1 is capable of reducing the Proposed Project's NOx emissions to less than significant at 99.30 lbs/day during construction, the Proposed Project can still result in a substantial amount of NOx emissions. Therefore, SCAQMD staff recommends changes to MM AIR-1 to further reduce NOx emissions during construction. Please see the attachment for more information.

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), SCAQMD staff requests that the Lead Agency provide SCAQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful or useful to decision makers and to the public who are interested in the Proposed Project.

SCAQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Alina Mullins, Assistant Air Quality Specialist, at amullins@aqmd.gov or (909) 396-2402, should you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment

LS:AM

RVC181107-01

Control Number

ATTACHMENT**Recommended Changes to MM AIR-1:**

1. CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse impacts. To further reduce NOx emissions during construction, SCAQMD staff recommends that the Lead Agency require the use off-road diesel-powered construction equipment that meets or exceeds the California Air Resources Board (CARB) and U.S. EPA Tier 4 off-road emissions standards or better for equipment rated at 50 horsepower or greater during construction. SCAQMD staff recommends that the Lead Agency incorporate the following changes to MM AIR-1 in the Final EIR.

Mitigation Measure

- AIR-1:** For each project during construction, off-road diesel-powered construction equipment greater than 50 horsepower shall meet or exceed Tier 4 emissions standards at a minimum ~~and Tier 4 emissions standards where available~~. A copy of each unit's certified tier specification or model year specification shall be available upon request at the time of mobilization of each applicable unit of equipment. The mitigation applies to off-road equipment and does not apply to on-road vehicles.
2. To ensure that MM AIR-1 is enforceable throughout the entire construction phase of the Proposed Project, SCAQMD staff recommends that the Lead Agency include the requirement on Tier 4 construction equipment in applicable bid documents, and that successful contractor(s) must demonstrate the ability to supply such equipment prior to the commencement of any construction activities. The Lead Agency should also require periodic reporting and provision of written documentation by contractors to ensure compliance, and conduct regular inspections to the maximum extent feasible to ensure compliance.