



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Riverside Transmission Reliability Project

717 Market Street, Suite 650

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Draft Subsequent Environmental Impact Report (Draft SEIR) for the Proposed West Basin Ocean Water Desalination Project Building (SCH No.: 2007011113)

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 SEIR.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to construct (1) approximately 0.4 miles of new overhead 230-kV double-circuit transmission line, (2) approximately two miles of new underground 230-kV double-circuit transmission line, (3) relocation of existing overhead distribution lines or a different overhead location to accommodate the new 230-kV transmission line, and (4) temporary uses of two marshalling yards to store construction materials (Proposed Project). Construction of the Proposed Project is expected to take approximately 26 months¹. Based on a review of aerial photographs of Project location, SCAQMD staff found that construction of portions of the Proposed Project would be in proximity to existing residential uses.

SCAQMD Staff's Summary of Air Quality Analysis

The Lead Agency quantified the Proposed Project's construction and operational emissions and compared them to SCAQMD air quality CEQA regional significance thresholds and found that the Proposed Project would be less than significant after incorporating Mitigation Measure (MM) AQ-01 through AQ-03². MM AQ-01 requires the preparation and implementation of a Fugitive Dust Control Plan. MM AQ-02 specifies exhaust emissions controls for worker vehicles and construction equipment. For example, construction equipment greater than 50 horsepower must meet Tier 4 emission standards, where available³. MM AQ-03 restricts overlapping construction to further reduce emissions from NO_x, PM₁₀, and PM_{2.5}.

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)⁴, 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 SEIR. Page 2-23.

² Draft SEIR. Page ES-24.

³ Draft SEIR. Page 4.3-46.

⁴ 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>.

General Comments

SCAQMD staff reviewed and has comments on the Air Quality Analysis in the Draft SEIR. Please see the attachment for more information. Additionally, as described in the 2016 AQMP, to achieve 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 attain the ozone NAAQS as expeditiously as practicable. The mitigation measures for the Proposed Project play an important role in contributing to NOx emissions reductions, as well as in reducing PM10 and PM2.5 emissions. Therefore, SCAQMD staff recommends changes to existing MM AQ-2 and additional mitigation measures to further reduce NOx, PM10, and PM2.5 emissions.

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 SEIR. 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 these issues and any other questions that may arise. Please contact me at lsun@aqmd.gov 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

RVC180330-04

Control Number

ATTACHMENT

Localized Air Quality Impact Analysis during Construction

1. Air quality impacts from both construction (including demolition, if any) and operation activities should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips).

Sensitive receptors are people that have an increased sensitivity to air pollution or environmental contaminants. They include schools, parks and playgrounds, daycare centers, nursing homes, elderly care facilities, hospitals, and residential dwelling units. Based a review of aerial photographs, SCAQMD staff found that existing residential uses are located in proximity to the Proposed Project (e.g., west of the underground 230-kV double-circuit transmission line). However, the Lead Agency did not quantify the Proposed Project's localized construction emissions in the Draft SEIR. Therefore, SCAQMD staff recommends that the Lead Agency quantify the Proposed Project's localized construction emissions and disclose the localized air quality impacts in the Final SEIR to ensure that any nearby sensitive receptors are not adversely affected by the construction activities that are occurring in close proximity. SCAQMD guidance for performing a localized air quality analysis is available on SCAQMD website⁵.

Recommended Changes to Existing Mitigation Measure (MM) AQ-02

2. As stated above, MM AQ-2 requires, among others, that “all off-road diesel-powered construction equipment greater than 50 horsepower (hp) meet the Tier 4 emission standards, where available [...]”⁶. This means that only Tier 4 engines can be used during construction. However, the Lead Agency's specified performance standards and timing for this requirement of MM AQ-02 is not consistent since it says that “construction equipment and vehicles are required to meet USEPA-certified Tier 3 emissions standards or higher”⁷. Based on this performance standard, Tier 3 engines may be used during construction. Additionally, according to Appendix G, *Air Quality and Greenhouse Gas Supporting Information*, Tier 4 emission standards were used to calculate mitigated construction emissions. Therefore, to be consistent with the modeling assumption and the Lead Agency's commitment to using Tier 4 engines, and to further reduce NOx emissions during construction, SCAQMD staff recommends that the Lead Agency incorporate the following changes to MM AQ-02 in the Final SEIR.

MM AQ-02: Exhaust Emissions Control

[...]

- During Project construction, all off-road diesel-powered construction equipment greater than 50 horsepower (hp) shall meet the Tier 4 emission standards, ~~where available~~. [...]

[...]

Performance Standards and Timing:

⁵ South Coast Air Quality Management District. *Localized Significance Thresholds*. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

⁶ Draft SEIR. Page 4.3-46.

⁷ *Ibid*.

[...]

- **During Construction:** (1) [...], (2) Provide copies of document that construction equipment and vehicles meet USEPA-Certified Tier 3 ~~4~~ emissions standards ~~or higher~~ to the CPUC as equipment is mobilized.

Additional Recommended Mitigation Measure

3. CEQA requires that all feasible mitigation measures go beyond what is required by law to minimize any significant impacts. To further reduce the impacts of NOx emissions during construction, the Lead Agency should require the use of diesel haul trucks that conform to 2010 USEPA truck standards or newer diesel haul trucks (e.g., material delivery trucks and soil import/export) during construction. If the Lead Agency determines that 2010 model year or newer diesel haul trucks are not feasible supported by substantial evidence in the record, the Lead Agency shall use trucks that meet EPA 2007 model year NOx emissions requirements, at a minimum. Include this requirement as a bid or contract specification with contractors. Require periodic reporting and provision of written documents by contractors to prove and ensure compliance

Permits

4. In the event that the Proposed Project requires a permit from SCAQMD, SCAQMD should be identified as a Responsible Agency for the Proposed Project in the Final SEIR. For more information on permits, please visit the SCAQMD webpage at: <http://www.aqmd.gov/home/permits>. Questions on permits can be directed to the SCAQMD's Engineering and Permitting staff at (909) 396-3385.