



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

June 27, 2017

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Draft Environmental Impact Report (Draft EIR) for the Proposed Eastern Coachella Valley Stormwater Master Plan (ECV SMP)

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 EIR.

Project Description and Air Quality Analysis

The proposed project consists of the construction of over 100 miles of channels and storm drains, 99 acres of debris basins, 11 miles of training levees, dams, and the modifications to the existing Coachella Valley Stormwater Channel. Construction is expected to occur over a “number of decades and the precise construction timing and phasing of all Facilities are unknown¹.” In the Air Quality section, the Lead Agency found that the proposed project would exceed SCAQMD’s regional air quality CEQA significance thresholds for NO_x during construction. After incorporating Mitigation Measure AQ-1², the Lead Agency found that the proposed project’s construction air quality impacts from NO_x 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 AQMP³ 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 NO_x emissions in 2023 and an additional 55 percent reduction in NO_x emissions beyond 2031 levels for ozone attainment.

Achieving NO_x 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. Therefore, SCAQMD staff recommends changes to the existing Mitigation Measure AQ-1 and a new Mitigation Measure AQ-2 to further reduce construction emissions from NO_x. Please see the attachment for more information.

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 EIR. Further, when the Lead Agency

¹ Eastern Coachella Valley Stormwater Master Plan – Draft EIR – Page 5.2-25.

² *Ibid.* Page 5.2-33.

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>.

makes the finding that the recommended mitigation measures are infeasible, the Lead Agency shall describe the specific reasons for rejecting them in the Final 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

RVC170607-04

Control Number

ATTACHMENT

Mitigation Measures

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 Mitigation Measure AQ-1 and one additional Mitigation Measure AQ-2 that the Lead Agency should include in the Final EIR. Additional information on potential mitigation measures as guidance to the Lead Agency is available on the SCAQMD CEQA Air Quality Handbook website⁴

Recommended Changes to Existing Mitigation Measure AQ-1

2. **MM AQ-1:** To reduce construction NOx emissions, the contractor's specification packages for each Facility construction project shall require construction equipment to meet Tier 3 4 CARB/U.S. EPA standards. The contracting company's fleet of off-road diesel-powered construction equipment shall meet or exceed Tier 3 4 off-road emissions standards. A copy of the fleet's tier compliance documentation, and CARB or AQMD operating permit shall be provided to the Lead Agency (i.e., City of Coachella, Riverside County, or CVWD) at the time of mobilization of each applicable unit of equipment. In the event that all construction equipment cannot meet the Tier 4 engine certification, the applicant must demonstrate through future study with written findings supported by substantial evidence that is approved by the Lead Agency before using other technologies/strategies. Alternative measures may 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.

Recommended Mitigation Measure

3. **MM AQ-2:** 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), 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.

⁴ South Coast Air Quality Management District. <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.