



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL AND USPS:

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dbott@ocwd.com

Daniel Bott
Orange County Water District
18700 Ward Street
Fountain Valley, CA 92708

Mitigated Negative Declaration (MND) for the Proposed Sunset Gap Monitoring Wells BS13, BS24 and Bolsa Chica Channel Levee Repair 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 Lead Agency and should be incorporated into the Final MND.

SCAQMD Staff's Summary of Project Description and Air Quality Analysis

The Lead Agency proposes to construct 11 new monitoring wells at two locations (BS13 and BS24) and geotechnical repairs to the Bolsa Chica Flood Control Channel Levee on the Naval Weapons Station Seal Beach within the City of Seal Beach (Proposed Project). In the Air Quality Section, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared those emissions to SCAQMD's regional and localized air quality CEQA significance thresholds to determine the significance of air quality impacts. Based on the analyses, the Lead Agency found that the Proposed Project's NO_x emissions during construction would be less than significant after incorporating Mitigation Measure AIR-1¹, and that the Proposed Project's operational air quality impact would be less than significant.

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 AQMP² is a regional blueprint for achieving air quality standards and healthful air in the South Coast Air Basin. 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 reduce an additional 45 percent reduction in nitrogen oxide (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 before the 2023 and 2031 deadlines. SCAQMD is committed to attain the ozone NAAQS as expeditiously as practicable, and the Proposed Project plays an important role in supporting SCAQMD's commitment. As such, SCAQMD staff recommends changes to the existing Mitigation Measure AIR-1 to further reduce NO_x emissions. Please see the attachment for more information.

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review

¹ MND. Section 4, Air Quality. Page 4-10.

² South Coast Air Quality Management District. March 3, 2017. *2016 Air Quality Management Plan*. Available at: <http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan>.

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process. 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 me at lsun@aqmd.gov if you have any questions.

Sincerely,

Lijin Sun

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

Attachment
LS
ORC171205-03
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 NO_x emissions during construction, SCAQMD staff recommends the following changes to the existing Mitigation Measure AIR-1 that the Lead Agency should include in the Final MND. Additional information on potential mitigation measures as guidance to the Lead Agency is available on the SCAQMD CEQA Air Quality Handbook website³.

Recommended Changes to the Existing Mitigation Measure AIR-1

2. **Mitigation Measure AIR-1:** If concurrent well drilling and construction activities occur at both Monitoring Wells BS13 and BS24, the project applicant shall require that all diesel equipment with a horsepower of ~~75~~ 50 or more utilized during the monitor wells drilling and construction phase of construction activities shall meet or exceed the Tier 4 emission standards. In the event that construction equipment cannot meet the Tier 4 engine certification, the Project representative or contractor 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 strategies 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 Project, using cleaner vehicle fuel, and/or limiting the number of individual construction project phases occurring simultaneously.

³ South Coast Air Quality Management District. <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.