



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Mitigated Negative Declaration (MND) for the Proposed PV Peninsula Water Reliability Project (PA-29-16)

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 a new pump station and a seven-mile underground potable water pipeline (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 (MM) AQ-1¹. MM AQ-1 will also reduce localized construction emissions from PM₁₀ and PM_{2.5} to less than significant².

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. 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 MM AQ-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. Attachment B. Pages B-14 and B-15.

² *Ibid.* Page B-18.

³ 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
MK: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 (MM) AQ-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 website⁴.

Recommended Changes to the Existing Mitigation Measure AQ-1

2. **MM AQ-1:** The Project shall utilize off-road diesel-powered construction equipment that meets or exceeds the CARB and USEPA Tier 3 4 off-road emissions standards for equipment rated at 50 hp or greater during Project construction. Such equipment will be outfitted with Best Available Control Technology (BACT) devices including a CARB certified Level 3 4 Diesel Particulate Filter or equivalent. These requirements shall be included in applicable bid documents and successful contractor(s) must demonstrate the ability to supply such equipment. A copy of each unit's certified tier specification or model year specification and CARB or SCAQMD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment. 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 applicable 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.

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