



**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:
EPT@mwdh2o.com

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Ms. Malinda Stalvey
The Metropolitan Water District of Southern California
Environmental Planning Team
P.O. Box 54153
Los Angeles, CA 90053-0153

Mitigated Negative Declaration (MND) for the Palos Verdes Reservoir Upgrades 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.

In the project description, the Lead Agency proposes to rehabilitate and refurbish aging water structures, and system upgrades. Since the project will include renovation and demolition, the Lead Agency must comply with SCAQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities and Rule 403 – Fugitive Dust. Please provide additional information regarding compliance with SCAQMD Rule 1403 and Rule 403 in the Final MND.

Additionally, the Lead Agency anticipates the use of portable construction equipment such as air compressors, generators, and dewatering pumps. The SCAQMD staff recommends that the Lead Agency revise the Air Quality Analysis to incorporate the use of portable construction equipment during the proposed project. SCAQMD staff would also like to remind the Lead Agency that portable construction equipment requires a stationary SCAQMD permit if the equipment plans on remaining on site for greater than 12 months.

Based on a review of the Draft MND the Lead Agency determined that the proposed project will result in significant air quality impacts during construction. The air quality analysis demonstrated that the proposed project will exceed the SCAQMD's construction significance threshold for NOx. Implementation of Mitigation Measure AQ-1 would reduce construction NOx emissions to less than significant. The SCAQMD staff recommends the following changes to Mitigation Measure AQ-1:

Recommended Changes to Mitigation Measures to AQ-1:

- ~~Heavy duty diesel powered construction equipment compliant with federally mandated clean diesel engines (EPA Tier 3) will be required.~~

Post-January 1, 2015: All off-road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

Additional Construction Mitigation Measures

- Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and import/export) and if the Lead Agency determines that 2010 model year or newer diesel trucks cannot be obtained the Lead Agency shall use trucks that meet EPA 2007 model year NOx emissions requirements.
- A copy of each unit’s certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.
- Encourage construction contractors to apply for SCAQMD “SOON” funds. Incentives could be provided for those construction contractors who apply for SCAQMD “SOON” funds. The “SOON” program provides funds to accelerate clean up of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at the following website:
- <http://www.aqmd.gov/tao/Implementation/SOONProgram.htm>

For additional measures to reduce off-road construction equipment, refer to the mitigation measure tables located at the following website: www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html.

The SCAQMD staff is available to work with the Lead Agency to address these concerns and any other air quality questions that may arise. Please contact Jack Cheng, Air Quality Specialist at (909) 396-2448, if you have any questions regarding these comments. We look forward to reviewing and providing comments for the Final EIR associated with this project.

Sincerely,

Jillian Wong

Jillian Baker, Ph.D.
Program Supervisor
Planning, Rule Development & Area Sources

JW:JC
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