



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178

(909) 396-2000 s www.aqmd.gov

SENT VIA E-MAIL AND USPS:

EPT@mwdh2o.com

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

Draft Environmental Impact Report (Draft EIR) for the Proposed F.E. Weymouth Water Treatment Plant Improvement Program

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.

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

Based on a review of the Draft EIR the Lead Agency determined that the proposed project will result in significant localized air quality impacts during construction. The air quality analysis demonstrated that the proposed project will exceed the SCAQMD's CEQA localized construction significance thresholds for NO_x even with mitigation measure AQ-1. This significant impact is primarily a result of extensive construction and use of heavy duty construction equipment.

Therefore, the SCAQMD staff recommends that pursuant to Section 15126.4 of the CEQA Guidelines the Lead Agency require the following additional mitigation measures in the Final EIR.

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 NO_x emissions requirements.
- Consistent with measures that other lead agencies in the region (including Port of Los Angeles, Port of Long Beach, Metro and City of Los Angeles)^[1] have enacted, require all on-site construction equipment to meet EPA Tier 3 or higher emissions standards according to the following:
 - Project start, to December 31, 2014: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 3 offroad emissions standards. 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.

^[1] For example see the Metro Green Construction Policy at:

http://www.metro.net/projects_studies/sustainability/images/Green_Construction_Policy.pdf

- Post-January 1, 2015: All offroad 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.
- 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.

Recommended Construction Mitigation Measures to Reduce NOx:

- Prohibit truck idling in excess of five minutes;
- Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow;
- Schedule construction activities that affect traffic flow on the arterial system to off-peak hour to the extent practicable;
- Reroute construction trucks away from congested streets or sensitive receptor areas; and
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation.
- Limit construction activities to the amounts analyzed in the Draft EIR.

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 Baker

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

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