



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 Montebello Hills Recycled Water Pipeline and Pump Station Project

South Coast Air Quality Management District (South Coast AQMD) 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.

South Coast AQMD Staff's Summary of Project Description

The Lead Agency proposes construction of 2,600 linear feet of 16-inch diameter recycled water pipeline and a 252-square-foot pump station on 0.14 acres (Proposed Project). The Proposed Project would have a peak demand capacity of 1,825 gallons per minute. The Proposed Project is located on Montebello Boulevard between Lincoln Avenue and Jefferson Boulevard in the City of Montebello. Construction of the Proposed Project would occur over five months¹.

South Coast AQMD Staff's Summary of Air Quality

In the Air Quality Analysis section, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared those emissions to South Coast AQMD's recommended regional and localized air quality CEQA significance thresholds. Based on the analysis, the Lead Agency found that the Proposed Project would result in less than significant regional and localized air quality impacts during construction and operation. Based on a review of the California Emissions Estimator Model (CalEEMod) modeling output files, South Coast AQMD staff found that the Lead Agency assumed the use of Tier 3 construction equipment to quantify the Proposed Project's construction emissions².

South Coast AQMD Staff's Comments

The Lead Agency did not require the use of Tier 3 construction equipment as a mitigation measure, project design feature, or condition of approval in the main body of the MND. To ensure consistency between the modeling assumptions and the air quality analysis in the MND, and to further reduce the Proposed Project's construction emissions, South Coast AQMD staff recommends that the Lead Agency incorporate the following mitigation measure requiring the use of Tier 4 construction equipment in the Air Quality Section of the Final MND.

- a. Require construction contractor(s) to use off-road diesel-powered construction equipment that meets or exceeds the California Air Resources Board (CARB) and U.S. Environmental Protection Agency (U.S. EPA) Tier 4 off-road emissions standards for equipment rated at 50 horsepower or greater during construction. Such equipment should be outfitted with Best Available Control Technology (BACT) devices including, but not limited to, a CARB certified Level 3 Diesel Particulate Filter (DPF). Level 3 DPFs are capable of achieving at least an 85 percent reduction in particulate matter emissions. A list of CARB verified DPFs are available on the CARB website.

¹ MND. Page 26.

² *Ibid.* Page 23.

Additionally, the Lead Agency should include this requirement in applicable bid documents, and that successful contractor(s) must demonstrate the ability to supply compliant equipment prior to the commencement of any construction activities. A copy of each unit's certified tier specification and CARB or South Coast AQMD operating permit (if applicable) should be available upon request at the time of mobilization of each applicable unit of equipment. Additionally, the Lead Agency should require periodic reporting and provision of written documentation by contractors to ensure compliance, and conduct regular inspections to the maximum extent feasible to ensure compliance with this mitigation measure. To ensure that off-road construction equipment used will meet or exceed Tier 4 off-road engine emission standards during construction, South Coast AQMD staff recommends that the Lead Agency incorporate this requirement as a project design feature, mitigation measure, or a condition of approval for the Proposed Project in the Air Quality Section of the Final MND rather than a mere modeling assumption in CalEEMod.

Conclusion

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 process. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, responses should provide sufficient details giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and the public who are interested in the Proposed Project. Further, if the Lead Agency makes a finding that the additional recommended mitigation measure is not feasible, the Lead Agency should describe the specific reasons for rejecting or substituting the mitigation measure in the Final MND (CEQA Guidelines Section 15074.1).

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Robert Dalbeck, Assistant Air Quality Specialist, at RDalbeck@aqmd.gov or (909) 396-2139, should you have any questions.

Sincerely,

Lijin Sun

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Planning, Rule Development & Area Sources

LS:RD

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