



South Coast
Air Quality Management District

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FAXED: February 18, 2009

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Mr. Lee Whittenberg
City of Seal Beach
211 8th Street
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**Draft Initial Study / Mitigated Negative Declaration (MND) for
City Wide Sewer Capital Improvement Project**

The South Coast Air Quality Management District (SCAQMD) 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 Mitigated Negative Declaration (MND).

The SCAQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Jeff Inabinet, Air Quality Specialist – CEQA Section, at (909) 396-2453, if you have any questions regarding the enclosed comments.

Sincerely,

Steve Smith, Ph.D.
Program Supervisor – CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS:JI

ORC090120-07
Control Number

1. According to the Initial Study/Mitigated Negative Declaration Document (IS/MND), the proposed sewer improvements are scheduled to take place over a ten-year period of time. As a worst-case scenario, the air quality analyses were conducted with all the sewer improvement projects taking place in a period of one year. SCAQMD staff requests that the lead agency identify the construction schedule of projects to ensure that construction activities for various improvement projects that overlap are accounted for in the air quality analysis, as overlapping projects using similar sets of construction equipment could result in higher peak emission values than analyzed in the IS/MND. To avoid multiple construction operations, SCAQMD staff requests that a mitigation measure be added that prohibits multiple crews from working at various sites at the same time. Additional information on the proposed construction schedule is needed.
2. In Project No. 4 – Pier Pump Station Improvements, listed on page 2-8, it is not clear what impacts are associated with the relocation of the pump station. For example, will the new site require substantial site preparation, which is not a major component of the current construction analysis? SCAQMD staff requests that the lead agency verify that the construction emissions analysis included any activities associated with the relocation of a pump station.
3. The totals estimated in the URBEMIS model calculation sheets provided in Appendix A do not match the emissions totals listed in the various tables located in Section 4.3- Air Quality analysis section. This discrepancy should be corrected or explained. It also appears that incorrect Localized Significance Threshold values are presented in Table 4.3-7 on page 4.3-16.
4. For any replacement, rehabilitation, or modification, it should be indicated if there will be an increase in the size of any stationary source equipment or an increase in existing equipment rating. If there is an increase, will there be an increase in energy demand?
5. On page 4.3-13, the SCAQMD's interim greenhouse gasses (GHGs) significance threshold tiered approach is described. The SCAQMD recognizes that CEQA lead agencies have the discretion to establish their own significance thresholds. The lead agency should be aware that the SCAQMD adopted a revised version of the interim GHG significance threshold proposal on December 5, 2008, that applies only to projects where the SCAQMD is the lead agency. This document can be found on the SCAQMD's website: <http://www.aqmd.gov/hb/2008/December/081231a.htm>.