



# South Coast Air Quality Management District

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E-Mailed: June 26, 2013  
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County of Los Angeles  
Department of Public Works  
Water Resources Division  
Reservoir Cleanout Program  
P.O. Box 1460  
Alhambra, CA 91802-1460

## **Review of the Draft Mitigated Negative Declaration (Draft MND) for the Big Tujunga Reservoir Sediment Removal 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 document as appropriate.

Based on a review of the Draft MND the SCAQMD staff appreciates that the project's conveyer belt option (Option #2) will minimize regional air quality impacts from the project compared to using trucks. However, the SCAQMD staff is concerned that the project design features (PDFs) for the low emission haul truck option (Option #1) may not provide the flexibility that is needed to ensure insignificant air quality impacts from the project. Therefore, SCAQMD staff recommends that the lead agency revise the proposed PDF's to allow an integrated use of lower emitting construction equipment and/or 2010 trucks. Further, the lead agency should provide SCAQMD with a copy of the final project conditions required to ensure enforcement of the project's proposed design features and mitigation measures (e.g., mitigation and monitoring report, development agreement and other requirements). Details regarding these comments are enclosed.

The SCAQMD staff requests that the lead agency provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the final project. Further, staff is available to work with the lead agency to address these issues and any

other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,



Ian MacMillan

Program Supervisor, CEQA Inter-Governmental Review  
Planning, Rule Development & Area Sources

IM:DG

LAC130509-02  
Control Number

### Project Design Features

1. The SCAQMD staff is concerned that the project design features (PDFs) for the low emission haul truck option (Option #2) may not provide the flexibility that is needed to ensure insignificant air quality impacts from the project. Therefore, SCAQMD staff recommends that the lead agency revise the proposed PDF's to allow a more integrated use of lower emitting construction equipment and/or 2010 trucks. Specifically, SCAQMD staff recommends that the lead agency revise PDF AQ-2 as follows:

PDF AQ-2 If the Low Emission Trucking Option is selected, the LACFCD shall require the project's on-road and off-road construction equipment fleet to meet the following requirements:

- a) Off-road diesel-powered construction equipment greater than 50 horsepower (hp) shall meet Tier 3 or better off-road emissions standards; and/or
- b) On road diesel haul trucks shall have 2010 or newer engines.
- c) The LACFCD's Contractor shall provide a copy of each unit's certified Tier and/or engine specification to the LACFCD at the time of mobilization of each applicable unit of equipment.

No use of an equipment combination shall exceed the estimated peak daily emissions identified in Tables 4-3 through 4-7 of the Draft EIR.

### SCAQMD Regulations and Recommendations

2. As a reminder, if the conveyance option is selected the conveyor belt system would require a SCAQMD permit. Also, if any onsite crushing or screening of oversized materials is performed, permits will be needed. In addition to the rules mentioned in Section 4.3 (Air Quality) of the Draft MND, the SCAQMD staff recommends that the lead agency review the final project and ensure that it complies with all SCAQMD rules and regulations. The project proponent should call Mr. Rodney Millican at (909) 396-2591 to discuss potential permit requirements for this project. Finally, the lead agency should provide SCAQMD with a copy of the final project conditions required to ensure enforcement of the project's proposed design features and mitigation measures (e.g., mitigation and monitoring report, development agreement and other requirements).