South Coast
Air Quality Management District
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Recirculated Mitigated Negative Declaration (MND) for the Proposed Pacoima Spreading Grounds Improvement 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.

SCAQMD Staff's Summary of Project Description

The Lead Agency is proposing improvements to the existing spreading grounds, including excavation of 1.6 million cubic yards (cy) of sediment to increase water storage capacity from 530 acre-feet (af) to 1,197 af and to increase the percolation rate from 65 cubic feet per second (cfs) to 142 cfs on 169 acres (Proposed Project). Construction of the Proposed Project will require 1.37-million cubic yards of sediment export to four off-site deposition locations. The Proposed Project is located on the southwest corner of Arleta Avenue and Devonshire Street in the City of Los Angeles. Construction of the Proposed Project is expected to occur over 20 months[1].

SCAQMD Staff's Summary of Air Quality Analysis

In the Air Quality Section, the Lead Agency quantified the Proposed Project's construction emissions and compared those emissions to SCAQMD's recommended regional and localized air quality CEQA significance thresholds. The Lead Agency found that construction of the Proposed Project would not result in significant adverse air quality impacts from regional NOx emissions or localized PM10 emissions after the implementation of Mitigation Measures (MM) AQ-1 and MM AQ-2. MM AQ-1 requires that all off-road diesel-powered construction equipment greater than 50 horsepower shall meet the Tier 4 Final emissions standards[2]. MM AQ-2 requires the top of the central levee spanning the spreading grounds in a northeast southwest direction be paved or a Roadway Mat System that is no less effective than a paved road at controlling fugitive dust emissions be installed[3]. Additionally, the Lead Agency found that construction-related cancer risks from the Proposed Project's diesel particulate matter (PM) emissions would range from 0.1 in one million to 8.4 in one million, which is below SCAQMD's CEQA significance threshold of 10 in one million for cancer risk, after the implementation of MM AQ-1[4].

SCAQMD staff has comments on the meteorological data and the onsite idling emissions calculations. Additionally, SCAQMD staff recommends that the Lead Agency incorporate additional mitigation measures to further reduce the Proposed Project's construction emissions, particularly from NOx. Please see the attachment for more information.

[1] Recirculated MND. Page 3-45.
[2] *Ibid*. Page 3-28.
[3] *Ibid*.
[4] *Ibid*. Table 3-8. Page 3-26.

Closing

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 SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, response 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 or useful to decision makers and to the public who are interested in the Proposed Project.

SCAQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Robert Dalbeck, Assistant Air Quality Specialist - CEQA IGR Section, at rdalbeck@aqmd.gov, if you have any questions regarding these comments.

Sincerely,

Lijin Sun

Lijin Sun, J.D.
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Attachment
LS:RD
LAC181113-04
Control Number

ATTACHMENT

Air Quality Analysis

AERMOD Dispersion Model: Meteorological Data

1. The U.S. EPA recommends that for on-site meteorological data, the most recent five-year data, or at least one year of site-specific data or at least three years of prognostic meteorological data be used for the purposes of air dispersion modeling[5]. If one year or more, up to five years, of site-specific data are available, these data are preferred for use in air quality analyses. Depending on completeness of the data record, consecutive years of national weather service, site-specific, or prognostic data are preferred[6]. The Lead Agency indicated that 2010-2014 meteorological data from the Burbank monitoring site was used for dispersion modeling for both criteria pollutants and toxic air contaminants (TACs) because "no monitoring data is available for the Burbank Station after 2014"[7]. However, the Burbank Airport Station has more recent AERMOD-ready meteorological data from 2012-2016 which should be used by the Lead Agency for the air dispersion modeling in the Final MND.

CalEEMod Input Parameter: Average Vehicle Weight

2. Based on a review of the CalEEMod output, SCAQMD staff found that the Lead Agency analyzed the Proposed Project's construction emissions resulting from 1.3-million-cubic-yards of sediment export using 14-cubic-yards (cy) capacity trucks (T6 vehicle class) and 18-cy capacity trucks (T7 vehicle class). Each scenario assumed that 100 percent of haul truck trips would be completed by their respective vehicle class. Upon review of the CalEEMod input parameters, SCAQMD staff found that the assumption of average vehicle weight was 20 tons for both classes of haul trucks. Considering an average T7 heavy heavy-duty truck can weigh up to 66,000 pounds[8] when empty, and one cy of sediment can weigh upwards of 2,000 pounds depending on compositional density of sediment, level of saturation, etc., SCAQMD staff is concerned that the Lead Agency has likely underestimated the average vehicle weight in each scenario, which may have led to an under-estimation of construction emissions from haul truck trips. Therefore, SCAQMD staff recommends that the Lead Agency recalculate the average vehicle weight for each individual vehicle class, including the added weight of sediment at full-load, and revise the Proposed Project's construction emissions, or provide additional information to justify the use of 20 tons for the average vehicle weight of each vehicle class in the Final MND.

On-Site Idling Emissions

3. In the Air Quality Section, the Lead Agency quantified the Proposed Project's construction emissions from idling for 7.5 minutes[9]. In order to analyze a worst-case impact scenario from idling, SCAQMD staff recommends that the Lead Agency revise the Air Quality Analysis to model idling emissions for 15 minutes at each point source. The 15-minute idling is conservative because it includes the emissions generated when entering the Proposed Project site while heading towards the dock area;

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[5] United States Environmental Protection Agency. February 2000. *Meteorological Monitoring Guidance for Regulatory Modeling Applications*. Page 6-30. Available at: https://www3.epa.gov/scram001/guidance/met/mmgrma.pdf. See also 40 CFR Ch. I (7-1-11 Edition). *Appendix W to Part 51 – Guideline on Air Quality Models*. Available at: https://www.gpo.gov/fdsys/pkg/CFR-2011-title40-vol2/pdf/CFR-2011-title40-vol2-part51-appW.pdf.

[6] *Ibid*.

[7] Recirculated MND. Section 3, *Environmental Checklist Form.* Page 3-24

[8] https://www.arb.ca.gov/msei/onroad/downloads/tsd/Vehicle_Population.doc.

[9] Recirculated MND. Page 3-23.

idling at the dock; and the emissions generated when leaving the docks while departing from the Proposed Project.

Recommended New Mitigation Measures

4. In the event that the Lead Agency finds, after incorporating the recommended revisions based on Comment Nos. 1 to 3, that the Proposed Project's construction emissions would exceed SCAQMD's recommended air quality CEQA significance thresholds, feasible mitigation measures are required and should be incorporated in the Final MND. CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate the Proposed Project's adverse impacts. To further reduce NOx emissions during construction from both on-site construction equipment and mobile sources, SCAQMD staff recommends that the Lead Agency incorporate the following mitigation measures in the Final MND.

- Require zero-emissions or near-zero emission trucks, if and when feasible. Consider measures such as incentives, phase-in schedules for clean trucks, etc. At a minimum, require that construction vendors, contractors, and/or haul truck operators commit to using 2010 model year and newer trucks (e.g., material delivery trucks and soil import/export).

- Suspend all on-site construction activities when wind speeds (as instantaneous gusts) exceed 25 miles per hour.

- All trucks hauling dirt, sand, soil or other loose materials are to be covered, or should maintain at least two feet of freeboard in accordance with California Vehicle Code Section 23114 (freeboard means vertical space between the top of the load and top of the trailer).

- Enter into a contract that notifies all construction vendors, contractors, and/or haul truck operators that vehicle and construction equipment idling time will be limited to no longer than five minutes. For any idling that is expected to take longer than five minutes, the engine should be shut off. Notify construction vendors, contractors, and/or haul truck operators of these idling requirements at the time that the purchase order is issued and again when vehicles enter the gates of the Proposed Project site. To further ensure that drivers understand the vehicle idling requirement, post signs at the Proposed Project's entry gates stating that idling longer than five minutes is not permitted. To further ensure that construction equipment operators understand the construction equipment idling requirement, post signs throughout the Proposed Project site.