



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 De Soto Trunk Line Replacement 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 to replace 2.5 miles or 14,600 feet of existing pipelines, ranging in size from 30 inches to 52 inches in diameter, along De Soto Avenue, Roscoe Boulevard, and the intersection of De Soto Avenue and Victory Boulevard, with 42-inch and 54-inch welded steel pipelines (Proposed Project). The Proposed Project is primarily located along De Soto Avenue (13,000 feet) between Roscoe Boulevard and Lemarsh Street, within the communities of Chatsworth-Porter Ranch and Canoga Park-Winnetka-Woodland Hills-West Hills. Construction of the Proposed Project is expected to occur over 42 months.

SCAQMD Staff's Summary of Air Quality Analysis

In the Air Quality Analysis, the Lead Agency quantified the Proposed Project's construction emissions and compared those emissions to SCAQMD's regional air quality CEQA significance thresholds and found that the Proposed Project's construction air quality impacts would be less than significant. SCAQMD staff has comments regarding the air quality modeling parameters used to estimate the Proposed Project's construction emissions. Additionally, SCAQMD staff recommends additional mitigation measures that the Lead Agency should consider and incorporate in the Final MND. Detailed comments are provided in the attachment.

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 the 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, at (909) 396-2139, if you have any questions regarding these comments.

Sincerely,

Lijin Sun

Lijin Sun, J. D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment

LS:RD

LAC181204-05

Control Number

ATTACHMENT

CalEEMod Land Use Subtype

1. The Lead Agency estimated the Proposed Project's construction emissions using the California Emissions Estimator Model (CalEEMod). The Lead Agency modeled the Proposed Project as a 4.6-acre "other non-asphalt surface." According to the CalEEMod User's Guide, the "other non-asphalt surface" is one of the land use subtypes for parking structures¹. Here, the Proposed Project involves the construction of a pipeline. However, CalEEMod does not include a land use subtype option for linear projects such as pipeline and roadway projects and is generally not appropriate for use to quantify construction emissions for linear projects. Therefore, SCAQMD staff recommends that the Lead Agency provide additional information to support that the land use subtype for parking structure in CalEEMod is appropriate for the Proposed Project in the Final MND. Alternatively, the Sacramento Metropolitan Air Quality Management District has developed the Roadway Construction Emissions Model (RCEM)². The RCEM is a modeling tool that can be used to estimate construction emissions for linear projects. The RCEM is available at: <http://www.airquality.org/Businesses/CEQA-Land-Use-Planning/CEQA-Guidance-Tools>.

Additional Recommended Mitigation Measures

2. CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse air quality impacts. To further reduce emissions resulting from off-road diesel-powered construction equipment and on-road haul trucks during construction of the Proposed Project, SCAQMD staff recommends that the Lead Agency incorporate the following mitigation measures in the Final MND.
 - Require the use of Tier 4 emissions standards or better for off-road diesel-powered construction equipment of 50 horsepower or greater. To ensure that Tier 4 construction equipment or better will be used during the Proposed Project's construction, SCAQMD staff recommends that the Lead Agency include this requirement in applicable bid documents, purchase orders, and contracts. Successful contractor(s) must demonstrate the ability to supply the compliant construction equipment for use prior to any ground disturbing and construction activities. A copy of each unit's certified tier specification or model year specification and CARB or SCAQMD operating permit (if applicable) shall 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 construction documents by construction contractor(s) to ensure compliance, and conduct regular inspections to the maximum extent feasible to ensure compliance.
 - Require zero-emission or near-zero emission on-road haul trucks, if and when feasible. At a minimum, require that construction vendors, contractors, and/or haul truck operators commit to using 2010 model year or newer trucks (e.g., material delivery trucks and soil import/export). Operators shall maintain records of all trucks associated with project construction to document that each truck used meets these emission standards, and make the records available for inspection.
 - Suspend all on-site construction activities when wind speeds (as instantaneous gusts) exceed 25 miles per hour.

¹ California Air Pollution Control Officers Association (CAPCOA). November 2017. *California Emissions Estimator Model (CALEEMod) User's Guide*. Page 23. Accessed at: <http://caleemod.com/>.

² Sacramento Air Quality Management District. May 2018. Roadway Construction Emissions Model (Version 9.0). Accessed at: <http://www.airquality.org/Businesses/CEQA-Land-Use-Planning/CEQA-Guidance-Tools>.

- 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, consistent with the California Air Resources Board's policy³. 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 Proposed Project site. To further ensure that drivers understand the vehicle idling requirement, post signs at the Proposed Project site, where appropriate, stating that idling longer than five minutes is not permitted.

³ California Air Resources Board. June 2009. *Written Idling Policy Guidelines*. Accessed at: <https://www.arb.ca.gov/msprog/ordiesel/guidance/writtenidlingguide.pdf>.