



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:

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eventura@cityofpasadena.net

Elisa Ventura, P.E., Principal Engineer
City of Pasadena, Water and Power Department
150 South Los Robles Avenue, Suite 200
Pasadena, CA 91101

Draft Environmental Impact Report (Draft EIR) for the Proposed Arroyo Seco Canyon Project Areas 2 and 3

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments include recommended air quality mitigation measures that the Lead Agency should include the Final EIR.

South Coast AQMD Staff's Summary of Project Description

The Lead Agency is proposing to demolish an existing water diversion and intake structure, build an intake system with a flow rate of 25 cubic feet per second, and make improvements to the existing spreading basins for infiltration (Proposed Project). Located at the base of the Arroyo Seco Canyon in the City of Pasadena, the Proposed Project consists of two areas: Area 2 for diversion and intake replacement and Area 3 for spreading basin improvements. The Devil's Gate Reservoir Sediment Removal and Management (Devil's Gate) project is located to the southwest of Area 3 of the Proposed Project¹. The closest portion of the Proposed Project representing an active work area is located approximately 500 feet from the Devil's Gate project to the southwest².

Construction of the Proposed Project is anticipated to occur over nine months³. "Approximately 1,608 cubic yards of earthwork material would be exported to support the construction of Area 2. [...] [A]pproximately 11,000 cubic yards and 37,000 cubic yards of earthwork material would be required to be exported and imported respectively during Area 3⁴." This would result in a total of 16,308 cubic yards of material delivery. The peak construction phase in Area 2, which would last approximately five days, would require one vendor delivery truck and 237 haul truck trips per day. During the peak construction phase in Area 3, 475 daily haul truck trips would be required for approximately 10 days⁵. A portion of the Proposed Project's construction truck route that would be in proximity to and partially coincident with that of the Devil's Gate project is in the area of North Windsor Avenue at Oak Grove Drive⁶, where existing residential uses are located.

South Coast AQMD Staff's Summary of the Air Quality Analysis

In the Air Quality Analysis section, the Lead Agency quantified the Proposed Project's construction emissions and compared those emissions to South Coast AQMD's recommended regional and localized air quality CEQA thresholds. Based on the analysis, the Lead Agency found that the Proposed Project's regional and localized construction air quality impacts will be less than significant. No air quality mitigation measures were included in the Draft EIR.

¹ Draft EIR. Page 4.1-29.

² *Ibid.* Page 4.1-18.

³ *Ibid.* Page 4.1-25.

⁴ *Ibid.* Page 4.1-19.

⁵ *Ibid.* Page 4.6-14 to 17.

⁶ *Ibid.* Page 4.6-19.

South Coast AQMD Staff's Comments – Recommended Air Quality Mitigation Measures

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 the Proposed Project's construction emissions, South Coast AQMD staff commends that the Lead Agency include air quality mitigation measures for implementation at the Proposed Project in the Final EIR. For more information on potential mitigation measures as guidance to the Lead Agency, please visit South Coast AQMD's CEQA Air Quality Handbook website⁷.

On-Road Construction Equipment

- a) As stated above, the Proposed Project will require a maximum of 16,308 cubic yards of soil import/export. A portion of the Proposed Project's construction truck route would be in proximity to and partially coincident with that of the Devil's Gate project in the area where existing residential uses are located. To reduce construction NOx emissions from haul truck trips, the Lead Agency should require the use of zero-emissions (ZE) or near-zero emissions (NZE) haul trucks during construction, such as trucks with natural gas engines that meet the CARB's adopted optional NOx emission standard of 0.02 grams per brake horsepower-hour (g/bhp-hr). At a minimum, require that truck operator(s)/construction contractor(s) commit to using 2010 model year or newer engines that meet California Air Resources Board's (CARB) 2010 engine emission standards of 0.01 g/bhp-hr for particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks. To monitor and ensure ZE, NZE, or 2010 model year or newer trucks are used at the Proposed Project, the Lead Agency should require that truck operator(s)/construction contractor(s) maintain records of all trucks associated with the Proposed Project's construction and make these records available to the Lead Agency upon request. Alternatively, the Lead Agency should require periodic reporting and provision of written records by truck operator(s)/construction contractor(s) and conduct regular inspections of the records to the maximum extent feasible and practicable.

Off-Road Construction Equipment

- b) Require the use of off-road diesel-powered construction equipment that meets or exceeds CARB and U.S. Environmental Protection Agency (USEPA) Tier 4 Final off-road emissions standards for equipment rated at 50 horsepower or greater during construction of the Proposed Project. Such equipment will be outfitted with Best Available Control Technology (BACT) devices including a CARB certified Level 3 Diesel Particulate Filter (DPFs). Level 3 DPFs are capable of achieving at least 85 percent reduction in particulate matter emissions. A list of CARB verified DPFs are available on the CARB website.

To ensure that Tier 4 Final construction equipment or better would be used during the Proposed Project's construction, South Coast AQMD staff recommends that the Lead Agency include this requirement in applicable bid documents, purchase orders, and contracts with construction contractor(s). 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, model year specification, and CARB or South Coast AQMD 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 documents by construction contractor(s) to ensure compliance, and conduct regular inspections to the maximum extent feasible to ensure compliance.

⁷ South Coast AQMD. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

In the event that construction equipment cannot meet the Tier 4 Final engine certification, the Project representative(s) or contractor(s) must demonstrate through future study with written findings supported by substantial evidence that is approved by the Lead Agency before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, construction equipment with Tier 4 Interim emission standards and reduction in the number and/or horsepower rating of construction equipment.

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), South Coast AQMD staff requests that the Lead Agency provide South Coast AQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail 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 will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and to the public who are interested in the Proposed Project. Further, if the Lead Agency makes the findings that the recommended mitigation measures are not feasible, the Lead Agency should describe the specific reasons supported by substantial evidence for rejecting them in the Final EIR (CEQA Guidelines Section 15091).

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 me at lsun@aqmd.gov if you have questions or wish to discuss the comments.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

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