



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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Revised and Recirculated Mitigated Negative Declaration (MND) for the Proposed Big Tujunga Reservoir Restoration Project (Proposed Project)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The Los Angeles County Flood Control District is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. South Coast AQMD staff previously submitted comments on the Proposed Project's original MND put forward by the Lead Agency in May 2013 and recommended the use of lower emitting construction equipment and/or 2010 trucks¹. In September 2021, the Lead Agency released a Revised and Recirculated MND for public review and comments. The following comments on the Revised and Recirculated MND include additional recommended air quality mitigation measures that the Lead Agency should include in the Final MND.

South Coast AQMD Staff's Summary of Project Information

Based on the Revised and Recirculated MND, the Proposed Project involves the use of trucks and equipment to remove 4.4 million cubic yards of sediment and restore capacity of the Big Tujunga Reservoir (Reservoir). Sediment excavation and removal are expected to take place during the non-storm season each year for five years and would be limited to 400 round-truck trips per workday (Mitigation Measure AQ-1)². The Proposed Project will be required to use off-road construction equipment that meet Tier 4 Final or better emission standards (Mitigation Measure AQ-2)³. To reduce the Proposed Project's air quality impacts from fugitive dust, heavy-duty trucks or equipment will be required to travel over paved haul roads/access roads, with an exception of a 0.4-mile portion of the routes within the Reservoir (Mitigation Measure AQ-3)⁴, and the Proposed Project will comply with requirements of South Coast AQMD Rule 403 (Mitigation Measure AQ-4)⁵. After implementation of all mitigation measures, the Proposed Project's maximum daily construction emissions were found to be below South Coast AQMD CEQA air quality significance thresholds for construction⁶.

¹ South Coast AQMD staff's comments on the MND. June 26, 2013. Accessed at:
<http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2013/june/big-tujunga-reservoir.pdf>.

² Revised and Recirculated MND. Page 3-6.

³ *Ibid.* Page 1-2.

⁴ *Ibid.* Page 4-23.

⁵ *Ibid.*

⁶ *Ibid.* Table 4-4. Page 4-20.

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

The Proposed Project would involve the use of 400 round-truck trips per workday for five years. In the 2013 MND, the Lead Agency stated that the Proposed Project would use all on-road trucks that meet the 2010 or newer model year emission standards, or all off-road equipment would be required to meet Tier 3 to reduce air pollutants⁷. Based on Table 2-1 in the Revised and Recirculated MND, the Lead Agency strengthened the requirement for off-road equipment to be Tier 4 Final or better. However, it is unclear if the Lead Agency has made any revisions to the requirements for on-road trucks and should clarify this in the Final MND.

Technology is transforming the transportation sector and construction equipment at a rapid pace. If using zero-emissions (ZE) or near-zero emissions (NZE) construction equipment and heavy-duty haul trucks to reduce the Proposed Project's construction air quality impacts was not feasible in 2013, the clean technologies for construction equipment and trucks are feasible today and will become increasingly more commercially available during the Proposed Project's five-year construction period. Therefore, it is recommended that the Lead Agency require the utilization of ZE or NZE construction off-road equipment and heavy-duty, on-road haul trucks, such as trucks with natural gas engines that meet the California Air Resources Board's (CARB) 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 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. Include this requirement in the Proposed Project's construction bid documents or in the Request for Proposal for selecting construction contractor(s)/truck operator(s).

Conclusion

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the Final MND for adoption together with any comments received during the public review process. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, responses 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, informative, or useful to decision makers and the public who are interested in the Proposed Project. Further, when the Lead Agency makes the finding that the recommended air quality mitigation measures are not feasible, the Lead Agency should describe the specific reasons supported by substantial evidence for rejecting them in the Final MND (CEQA Guidelines Sections 15070 and 15074.1).

⁷ *Ibid.* Table 2-1. Page 2-9.

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

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS

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