



South Coast Air Quality Management District

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January 21, 2014

Los Angeles County Flood Control District
Department of Public Works
Water Resources Division
Attn: Reservoir Cleanouts Program
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Draft Environmental Impact Report (Draft EIR) for the Proposed Devil's Gate Reservoir Sediment Removal and Management Project (SCH #2011091084)

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 CEQA document.

The Lead Agency proposes to remove approximately 2.9 million cubic yards of sediment from the Devil's Gate Reservoir plus any additional sediment that accumulates during construction. Removal activities will include approximately 425 daily truck round trips during excavation with 25 percent of the truck haul trips transporting green waste debris to a local landfill with the remaining 75 percent of the truck trips hauling sediment to other sites. The project will take approximately five years to complete beginning in the summer of 2015. Reservoir management will then start after 2020 to reduce sediment buildup in the future and to reduce or eliminate the need of another large-scale removal activity.

On page 30 of the Air Quality Report, the Lead Agency cites a U.S. Environmental Protection Agency (EPA) conversion factor guideline for using EMFAC emission factors when estimating vehicle emissions for on-road trucks. This guideline discusses using a NOx conversion factor from grams per mile to grams per brake-horsepower per hour when estimating heavy-duty truck engine emissions. The SCAQMD staff notes that the conversion guideline document published by the U.S. Environmental Protection Agency (EPA) cited in Appendix B on page 30 in the Air Quality Report is outdated and does not apply to California. EMFAC2011 should be used instead in order to calculate emission benefits for cleaner trucks. In addition, the Lead Agency proposes to use EPA 2007 model year trucks during sediment removal activities as mitigation.¹ Since 2007 model year trucks are generally considered to have only PM controls but no NOx controls,² the Draft EIR should be revised omitting reference to reduced NOx emissions in the Final

¹DEIR, Air Quality Report, page 31, Mitigation AQ-1

²California Air Resources Board: <http://www.arb.ca.gov/msprog/onrdiesel/regulation.htm>

EIR. If the Lead Agency will require only 2007 model year trucks during project activities, NOx reduction credit should not be taken in the air quality analysis. Finally, in order to determine the feasibility of the mitigation proposed starting on page 29 in Appendix B, the SCAQMD staff recommends that the proportion of 2007 and 2010 model year trucks during the applicable project years be reviewed using EMFAC2011 to determine if the measure is feasible in the Final EIR.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD staff with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. The SCAQMD staff is available to work with the Lead Agency to address these issues and any other air quality questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,



Ian MacMillan
Program Supervisor, Inter-Governmental Review
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IM:GM

LAC131105-01
Control Number