

## **Summary of SCAP Concerns:**

### **1) Large Roadway Project definition-**

- a) Agencies need a clear reliable resource for determining whether their project meets the “Large Roadway Project” definition.
- b) “Adjacent location” is ambiguous regarding intent. It could affect facility projects that are not part of the roadway based on current wording.

### **2) Crushing/Grinding Operations applicability-**

- a) Consider either expanding this definition or adding an exemption- Need to clarify the applicability of activities common to utility projects, such as saw cutting and grinding. These activities already use wet methods and are not part of an aggregate operation- “production” of a finished material.

### **3) Material pile Prohibition/Size Restrictions**

- a) The prohibition in (d)(1) is problematic for essential public service utility projects, especially since it will prohibit material storage from project related storage/staging areas as well.

### **4) Signage**

- a) The proposed signage requirements in (d)(3)(C) require a large number of signs- Suggest that signage is capped similar to the Rule 403 Large Operations guidance- No more than 4 required per project.
- b) Suggest removal of posting signage every 300 feet along the project boundary-
  - i) This is challenging for a project that is moving at a 100-300 feet per day Does this apply to both sides of the roadway? This is a large number of signs.

### **5) Public Notification**

- a) PR 403.2 (d)(3)(D)(i) Public Notification- These notification requirements are burdensome. We propose that SCAQMD remove and explore the feasibility of hosting the project information on their website or establish a listserv like their Dust Advisories, No Burn Alerts etc.
- b) PR 403.2 (d)(3)(D)(ii) SCAQMD Notification-
  - i) Suggest that these provisions are consistent with the notification procedures for Rule 403 Large Operations for consistency amongst rules.
  - ii) Suggest revision to Notification within 7 days (like Rule 403) and remove use of hours
  - iii) Use of term “establishing” is ambiguous
  - iv) Will SCAQMD provide a form or guidance on the required notification? For example, Rule 403 large operation notifications are typically submitted via email to a specific email group at AQMD.

### **6) Suggested Exemption from Rule for Essential Public Service Linear Trenching**

- a) Because linear trenching for water, sewer, and other essential public services is limited in size of disturbed area, typically less than 2 feet – 16 feet wide, therefore dust generated during these projects is minimal.

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- b) Linear trenching projects are transitory in nature, with construction activities moving along the alignment at 100-300 feet per which avoids long term dust impacts to nearby residents.
- c) Dust controls are already required in existing project specifications.
  - i) Attached are standard specifications governing work site maintenance, air pollution control, storage of equipment and materials at work sites and in public streets, excerpts of specifications from recent projects, and best management practices used for projects that disturb greater than 1 acre (implemented as part of Stormwater Pollution Prevention Plans – required by the SWRCB’s Construction General Permit for Stormwater Discharge).

