



South Coast Air Quality Management District

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111 North Hope Street, Room 1044
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Draft Environmental Impact Report (Draft EIR) for the Proposed Upper Stone Canyon Reservoir Water Quality Improvement Project

The South Coast Air Quality Management District (AQMD) 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.

In the project description, the lead agency proposes the construction of a new buried concrete-covered reservoir to replace the existing uncovered Upper Stone Canyon Reservoir. The new buried reservoir would be constructed in the same location but have a slightly reduced footprint. The amount of portable water storage would remain the same, i.e., 138 million gallons. The proposed project would also include a maximum depth of three feet of topsoil with shallow-rooting plant species used to landscape the area covering the reservoir.

The AQMD staff is concerned that all feasible mitigation measures have not been incorporated into the proposed project by the lead agency. The lead agency has determined that project construction impacts exceed the AQMD recommended daily significance thresholds for NO_x, PM₁₀ and PM_{2.5} but has included mitigation measures that only address construction NO_x emissions, i.e., mitigation measures AIR-A through AIR-E. The lead agency also cites general compliance with AQMD Rule 403 – Fugitive Dust using 61 percent control efficiency in its site preparation emission estimates but specific mitigation measures to control fugitive dust are not included in the Draft EIR. The lead agency is reminded that complying with a rule, regulation, law, etc., should not be considered as mitigation if it is required. The AQMD staff therefore recommends that the lead agency list specific measures used in its construction calculations in the Final EIR and also consider additional measures similar to mitigation measures AQ1 through AQ9 on page 35 in the appendices: Air Quality and Noise Impact Report. Additional mitigation measures to further reduce construction air quality impacts are also available on the AQMD website.¹

¹ http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html

Lastly, several potential overly conservative calculation methodologies may have led the lead agency to overestimate localized impacts and health risks during construction of the proposed project. These include:

- 1) Using modeled concentrations from a 24-hour averaging period instead of an annual averaging period for the health risk analysis; and
- 2) Not accounting for implementation of recent ARB rules requiring heavy duty trucks to have particulate traps by 2016; and
- 3) Assuming construction emissions occur continuously over a 24-hour period instead of making a time-of-day adjustment in the model to account for only eight hours of activity; and
- 4) Using emission factors in the model that do not correspond to the calculated emission factors in the spreadsheets included in the appendix.

Accounting for these factors may change the lead agency's determination of significant localized and health impacts to less than significant impacts. AQMD staff recommends that the Final EIR include a revised analysis that accounts for these factors. If impacts are found to be significant, additional mitigation should be considered as described above.

Pursuant to Public Resources Code Section 21092.5, please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. The AQMD 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
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IM:GM

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