

---

*This is a living document which will be updated and enhanced based on further input from CARB, SCAQMD, the community, and results of air monitoring. Additional action threshold levels are being discussed and will be informed by the air quality testing currently being performed.*

---

**Immediate Action Plan**  
**Devil's Gate Reservoir Restoration Project**  
(Version 2. May 13, 2019)

**1. Project Description**

The 2009 Station Fire burned more than 160,000 acres of the San Gabriel Mountains, and the subsequent storms brought in more than 1.3 million cubic yards of sediment into Devil's Gate Reservoir, which greatly reduced the flood control capacity of the reservoir. Los Angeles County Public Works will restore the reservoir capacity by removing excess sediment to protect downstream communities along the Arroyo Seco. As part of the project, over 70 acres of enhanced habitat will be created and restored, and invasive species removed. The sediment removal component of the Devil's Gate Reservoir Project is expected to commence in May 2019.

**2. Purpose**

The purpose of the Immediate Action Plan is to identify and document protocols in-place to mitigate potential impacts to residents and the surrounding community, and to provide for the safety of the residents during reservoir restoration operations. This plan includes procedures for noise, dust, and haul truck emissions monitoring, mitigation measures, and community notification and contacts. Public Works construction inspectors will be onsite during operating hours to ensure the project site and operation are in good order.

**3. Project Site/Location**

Figure 1 depicts the project site and location for the first year of operation.

**4. Operation**

**Sediment Removal/Maintenance** - The project operation will involve removing sediment from the reservoir and transporting sediment to two off-site locations for disposal.

The debris removal is necessary to safeguard downstream communities by maintaining operability of the Devils Gate Dam and maximize storage capacity in the reservoir. Once removed, this debris will be transported to Los Angeles County Flood Control District's Manning Pit in the City of Irwindale and/or the Vulcan Materials Company Sheldon Pit in Sun Valley.

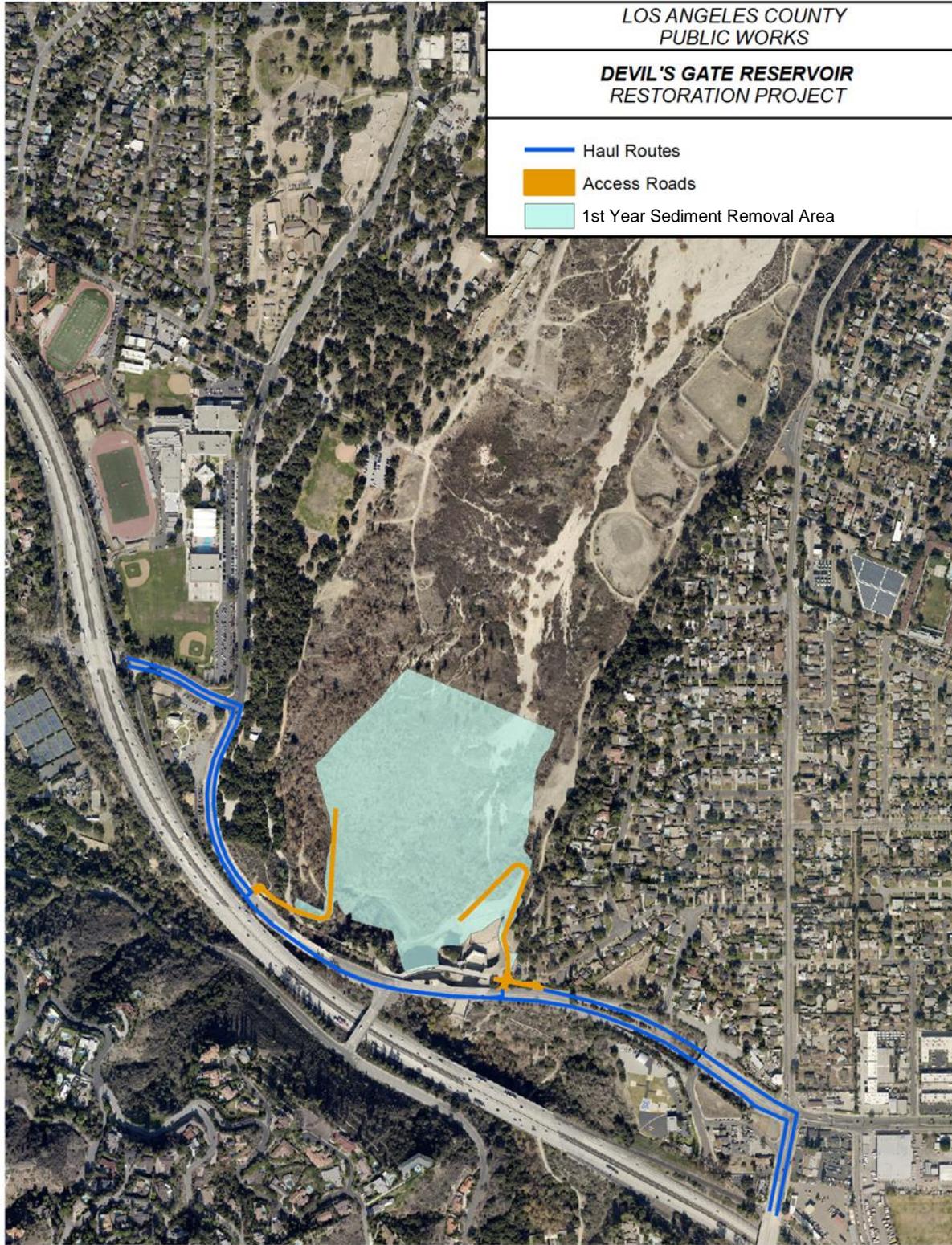


Figure 1. Project Site Location

**Operating Period, Days, and Hours** - The first year of sediment removal operation will begin in May 2019 and is expected to end in November 2019. Work onsite will occur Monday through Friday, between 7:00 a.m. and 5:00 p.m. Daily hauling will be limited to Monday through Friday, between 7 a.m. and 3:30 p.m., and coordinated to avoid school drop-off hours. There will be no hauling on weekends, holidays, or during major Rose Bowl events.

## **5. Mitigation Measures**

### **Dust Control**

The project site is subject to AQMD Rule 402 (Nuisance) and 403 (Dust Control). Public Works will ensure that the contractor has a dust control supervisor on-site. Public Works has gone above, having required that the contractor develop a dust control plan in full compliance with AQMD's requirements. Public Works will ensure that the project contractor will implement dust control mitigation measures per Rule 403, such as spraying water to control fugitive dust, checking the loaded material loaded in haul trucks has the proper freeboard or is tarped, the use of rumble plates as trucks exit the site, and maintain frequent street sweeping. The Public Works on-site supervisor will review the daily dust control checklist.

Signs with AQMD's phone number 1-800-CUT-SMOG are posted at the entrance to the project site for dust complaints reporting. Public Works will also monitor and document visible smoke from construction equipment and haul trucks.

### **Noise Control**

A temporary sound barrier has been constructed for the new project site entrance ramp to minimize project related noise impact to adjacent residential areas. New access ramps have been constructed to keep sediment hauling away from residential areas

The operation of any off-road construction equipment that is powered by a greater than 200-horsepower engine will be prohibited from operating within 180 feet of any offsite residential structure.

### **Construction Equipment and Haul Truck Emissions**

Construction equipment must register with California Air Resource Board's (CARB) Diesel Off-Road On-line Registration System (DOORS) database. Portable equipment must register with CARB's Statewide Portable Equipment Registration Program (PERP) or obtain an AQMD permit to operate to ensure equipment compliance with emission standards, if applicable.

The project contractor is required to use only USEPA 2010 emissions compliant haul trucks. These haul trucks must comply with an opacity using a CARB Periodic Smoke Inspection Program (PSIP) test result of no more than 5% <sup>1</sup>. The list of compliant haul trucks is posted on the project website (<https://dpw.lacounty.gov/swe/devilsgate/resources.shtml>). Additionally, all haul trucks must not be under any current emission recalls without having been repaired.

A haul truck Inspection/Maintenance Plan (IMP)<sup>2</sup> has been implemented, including initial PSIP testing, registration with CARB's Truck Regulation Upload Compliance and Reporting System (TRUCRS) database.

---

<sup>1</sup> <https://dpw.lacounty.gov/swe/devilsgate/docs/SedimentHaulTruckCompliance.pdf>

<sup>2</sup> <https://dpw.lacounty.gov/swe/devilsgate/docs/DraftInspectionandMaintenancePlan-050719.pdf>

Public Works inspector will conduct spot visual observations of the trucks and check the Malfunction Indicator Light (MIL) status.

All equipment and trucks that fail to meet the requirements will be asked to have deficiencies corrected before returning to the project site.

Furthermore, an Equipment and Haul Trucks Idling Plan<sup>3</sup> has been implemented to comply with idling restrictions.

## 6. Monitoring Program

### Air Monitoring

A Preliminary Compliance Monitoring and Ambient Air Measurements Workplan<sup>4</sup> has been implemented to ensure project emissions are in compliance with AQMD's rule and do not exceed AQMD Air Quality Thresholds.

- **Compliance Monitoring** - Air monitoring will be implemented at upwind/downwind locations of the project site to monitor fugitive dust emissions per Rule 403.
- **Ambient Air Quality Monitoring** - Ambient air quality monitors have been installed at selected sites to measure ambient air quality in the adjacent sensitive facility (i.e., school) and neighboring communities.
- **Haul Truck Emission Compliance I/M Monitoring** - Public Works will periodically observe to ensure no visible smoke is emitted from haul trucks, and check MIL status.

## 7. Action Threshold Levels

- **Air Compliance Threshold** - For fugitive dust, the threshold between upwind and downwind is 50 ug/m<sup>3</sup> per Rule 403<sup>5</sup>.
- **Haul Truck Opacity Threshold** - Haul Truck Opacity Threshold of 5%.

## 8. Community Notification

Community notification and information dissemination will continue to occur through the following sources:

---

<sup>3</sup> <https://dpw.lacounty.gov/swe/devilsgate/docs/DraftEquipmentandTruckIdlingPlan.pdf>

<sup>4</sup> <https://dpw.lacounty.gov/swe/devilsgate/docs/DraftInspectionandMaintenancePlan-050719.pdf>

<sup>5</sup> <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf?sfvrsn=4>

- Website: [devilsgateproject.com](http://devilsgateproject.com)
- Information Phone line: (626) 458-2507
- Community Mailers: Distributed to the adjacent communities, as needed
- Meetings: community or townhall meetings
- Community Mailing List: email messages to actively maintained mailing list of interested stakeholders

#### 9. Action(s) To Be Taken When Exceeding Action Threshold Level

- **Air Compliance Monitoring** – when the air compliance monitoring results exceed the threshold level, additional dust control measures will be implemented, and may include: more frequent water spray to suppress dust emissions, and increase the frequency of haul road sweeping/cleaning.
- **Haul Trucks I/M Monitoring** - If haul trucks PSIP test exceeds 5% opacity, then the vehicle will not be allowed to be on the project until the deficiency is corrected or repaired, and retested before allowing to operate at project site.

#### 10. Contact Information

Questions and concerns are to be directed to (626) 458-2507 which is operated by Public Works. Phone messages will receive responses within one business day. Questions and reports can also be addressed to the project email account [devilsgateproject@dpw.lacounty.gov](mailto:devilsgateproject@dpw.lacounty.gov).

#### Construction Manager/Community Liaison:

Brittany Barker, P.E.

(626) 458-4971 Office

626) 476-4875 Cellular