# Exceptional Events Mitigation Plan for the Coso Junction PM10 Planning Periodic Review

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#### **Great Basin Unified Air Pollution Control District**

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#### 1.0 Summary and Purpose

On October 3, 2016, the U.S. Environmental Protection Agency (EPA) revised the Treatment of Data Influenced by Exceptional Events Rule<sup>1</sup> that allows data to be excluded from consideration when making decisions related to the attainment status of an area. The Exceptional Events Rule requires the development of plans to mitigate the effects of exceptional events to safeguard public health.

The EPA identified several areas in California, including the Coso Junction Planning Area, as areas with historically documented or known seasonal PM10 (PM10 is particulate matter of size less than or equal to 10 micrometers) exceptional events, and subject to the mitigation plan requirements of 40.CFR 51.930(b). Mitigation plans are required to contain: a public notification and education program for the affected communities; steps to identify, study, and implement mitigating measures; and provisions for the periodic review and evaluation of the mitigation plan including public review.

The Great Basin Unified Air Pollution Control District (District) prepared the first Exceptional Events Mitigation Plan for the Coso Junction PM10 Planning on September 6, 2018<sup>2</sup>, following public review. The 2018 plan called for review after five years; this document is the five year review and update. The updated plan includes all of the original information included in the original plan with updated information. The plan is also expanded to discuss mitigation and notification for wildfire smoke events.

## 2.0 Geographic Setting

The Coso Junction PM10 Planning Area is located in Eastern California in the southern portion of Inyo County which is a part of the Great Basin Unified Air Pollution Control District (Figure 2.1). The planning area is in an arid desert area that receives less than 5 inches of rainfall per year. The area is rural in nature and sparsely populated. The District's PM10 monitoring site is located near the Coso Junction rest area in the Rose Valley at an elevation of 3,386 feet above sea level (ASL). This valley is flanked by the Sierra Nevada mountain range which rises to the west to 10,000 feet ASL, and the Coso Range to the east, which rises to over 8,000 feet ASL. The China Lake Naval Air Weapons Station, which covers most of the Coso Junction PM10 Planning Area, is generally restricted from public access.

<sup>&</sup>lt;sup>1</sup> Exceptional Events Rule: <a href="https://www.epa.gov/air-quality-analysis/treatment-air-quality-data-influenced-exceptional-events-homepage-exceptional">https://www.epa.gov/air-quality-analysis/treatment-air-quality-data-influenced-exceptional-events-homepage-exceptional</a>

<sup>&</sup>lt;sup>2</sup> First EE Mitigation Plan: https://gbuapcd.org/District/AirQualityPlans/Coso/

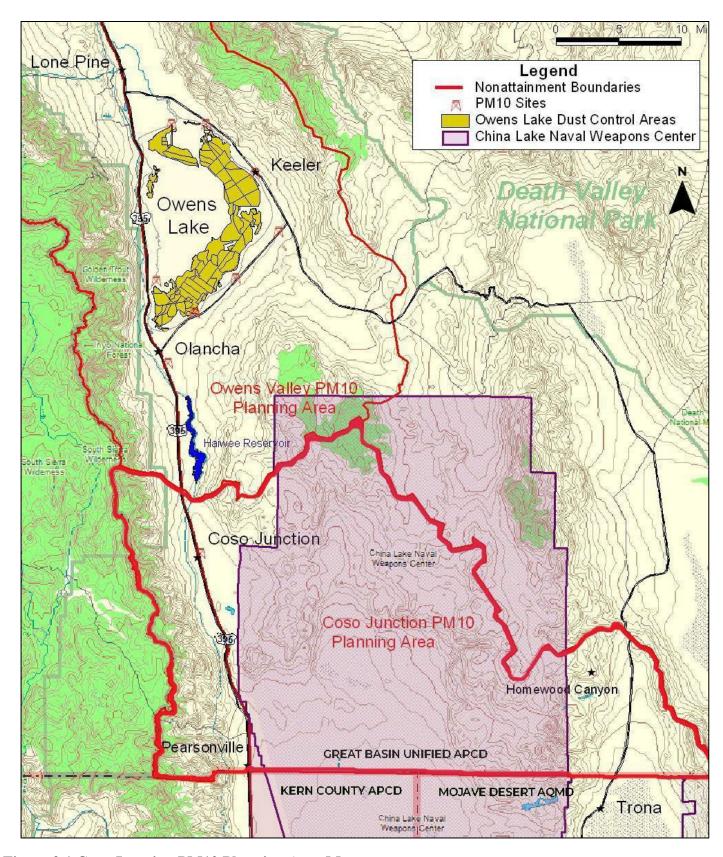


Figure 2.1 Coso Junction PM10 Planning Area Map

#### 3.0 Air Quality

Air quality in the Coso Junction PM10 Planning Area is generally excellent with annual average PM10 concentrations less than 20 micrograms per cubic meter (μg/m³) over the past ten years. Winds in the Coso Junction PM10 Planning Area are generally light at 3 meters per second (m/s) or less (6.7 miles per hour (mph)). Days with wind speeds greater than 7 m/s (15.6 mph) for hourly averages occur ten to fifteen times each calendar year. The frequency of exceedances of the federal PM10 standard, 150 ug/m³ for a 24-hour average, as well as the annual average PM10, measured at the District's Coso Junction monitoring station are listed in Table 3.1, with detailed information for each exceedance provided in Table 3.2.

Historically, air pollution in the Coso Junction PM10 Planning Area has been dominated by windblown dust transported from Owens Lake, located north of the Rose Valley, outside the Coso Junction PM10 Planning Area. Owens Lake lies within the Owens Valley PM10 Planning Area, a serious PM10 nonattainment area. The District has air quality regulatory enforcement authority over both the Coso Junction and the Owens Valley PM10 Planning Areas. As dust mitigation has been implemented on the emissive areas of Owens Lake by the City of Los Angeles Department of Water and Power, the number of monitored PM10 exceedances in the Coso Junction PM10 Planning Area from Owens Lake have dramatically reduced. As of 2023, Owens Lake has approximately 47.8 square miles of dust control. In recent years, Owens Lake has not been identified as the primary cause or a significant contributor to any PM10 exceedances at the Coso Junction PM10 monitor.

Air pollution from District permitted facilities within the Coso Junction PM10 Planning Area boundaries are primarily located east of the monitoring site and due to prevailing winds generally do not have a significant impact on monitored PM10 concentrations in the planning area. These sources include the Coso geothermal power operations, military operations at the China Lake Naval Air Weapons Station, and volcanic cinder and pumice mining operations. Particulate matter pollution has been documented from sources other than Owens Lake. High PM10 concentrations have been monitored and documented due to windblown dust from abandoned agricultural land, from windblown dust from unpaved truck parking areas, from disturbed and undisturbed open areas of desert, and from silt deposits from flash flooding. The agricultural land, located north of the monitoring site, was stabilized by natural vegetation cover after the land was fallowed in 1991. Since that time no agricultural activities have taken place in the Coso Junction PM10 Planning Area. Flash flooding in July 2013 caused silt and soil to be deposited on the valley floor that dried and became a source of PM10 emissions and associated exceedances. These events were documented as exceptional events by the District. Vegetation has begun to reestablish on the emissive silt deposit areas and should provide reasonable control in the next several years. In the future there is the possibility that recent or future flash flooding could create additional emissive

silt deposits that may take a period of time to stabilize. The magnitude and frequency of possible silt deposit emissions would not only be dependent on if flash flooding events occur in the area, but also on the location of emissive areas relative to the monitoring station. In recent years, including 2020 and 2021, PM10 exceedances from wildfire smoke events have occurred more frequently and there have been no recent exceedances from flash flood deposits. The District has documented the PM10 exceedances caused by wildfire smoke events as exceptional events. Table 3.2 presents a list of all the exceedances monitored at the Coso Junction monitoring station since 2010, as well as a description of the source of the exceedance.

Table 3.1 Coso Junction PM10 NAAQS Exceedances 2010-2022

	Number of PM	10 NAAQS Exceedances	Annual Average PM10	
Year	All Data	Data Excluding Exceptional Events	Concentrations (excluding exceptional events)	
2010	0	0	14.8 μg/m³	
2011	3	3	18.3 μg/m³	
2012	1	1	15.3 μg/m³	
2013	2	0 1	18.1 μg/m³	
2014	3	1 1	17.7 μg/m³	
2015	0	0	15.5 μg/m³	
2016	1	1	16.8 μg/m³	
2017	3	3	18.3 μg/m³	
2018	1	1	17.1 μg/m³	
2019	1	1	14.8 μg/m³	
2020	2	1 2	22.0 μg/m³	
2021	3	1 2	19.3 μg/m³	
2022	1	1	15.8 μg/m³	
2023*	0	0	n/a	

<sup>&</sup>lt;sup>1</sup> Exceptional events due to flash flood deposits

<sup>&</sup>lt;sup>2</sup> Exceptional events due to wildfire smoke events

<sup>\*2023</sup> to date: only includes data from Quarters 1-3 (January-September).

Table 3.2 Monitored PM10 Exceedances at Coso Junction, 2010-2023

Exceedance Date	PM10 Exceedance value (µg/m³)	Maximum hourly wind speed		Max Wind Direction	Request Exclusion	Primary Cause of Exceedance
		m/s	mph	(degrees)	from NAAQS	
2/8/2011	204	11.32	25.3	328	No	North Wind. Regional Event.
11/30/2011	219	18.51	41.4	350	No	North Wind. Regional Event.
12/1/2011	189	17.83	39.9	344	No	North Wind. Continuing regional event from the north, compounded by Owens Lake emissions, notably Phase 8 pre-gravel.
3/6/2012	173	17.10	38.3	275	No	West Wind. Naturally emissive desert playa
8/7/2013	162	11.74	26.3	257	Yes	West Wind. Flash flood deposits
9/25/2013	157	12.83	28.7	269	Yes	West Wind. Flash flood deposits
2/16/2014	314	17.14	38.3	266	Yes	West Wind. Flash flood deposits
4/25/2014	261	20.57	46.0	252	Yes	West Wind. Flash flood deposits
12/31/2014	673	17.60	39.4	354	No	North Wind. Regional event, compounded by sources south of Owens Lake
11/16/2016	266	19.56	43.8	259	No	West Wind. Contributions from local sources and natural sources to the west.
3/31/2017	229	16.51	36.9	332	No	North Wind. Regional event from north.
7/29/2017	195	1.14	2.6	338	No	Local sources: Paving operation (AQS info qualifier code "J- Construction")
12/20/2017	166	16.01	35.8	265	No	West Wind. Naturally emissive desert playa
2/11/2018	275	21.31	47.7	275	No	West Wind
9/2/2019	156	7.69	17.2	156	No	Regional windblown dust / wildfire smoke
9/7/2020	189	10.40	23.3	287	Yes	Creek Fire/SQF Complex wildfire smoke
9/8/2020	553	14.31	32.0	352	No	Creek Fire/SQF Complex wildfire smoke followed by regional windblown dust.
9/19/2021	165	4.11	9.2	326	Yes	Wildfire smoke: KNP Complex, Windy Fire
9/27/2021	233	3.13	7.0	183	Yes	Wildfire smoke: KNP Complex, Windy Fire
10/11/2021	656	22.71	50.8	256	No	West Wind. Naturally emissive desert playa
4/11/2022	1549	25.34	56.7	263	No	West Wind. Naturally emissive desert playa

## 4.0 Exceptional Events

The US EPA Exceptional Events Rule defines an Exceptional Event as an event that affects air quality, is not reasonably controllable or preventable and is caused by a natural event or by human activity that is unlikely to recur at a particular location. The Coso Junction PM10 Planning Area has experienced exceptional events due to emissive flash flood deposits as well as from wildfire smoke events. The area was subject to flash flooding in July 2013, in which silts and sands were carried from the alluvium of the Sierra Nevada and Coso Mountain ranges and deposited on the valley floor. This area comprises the western portion of the Coso Junction PM10 Planning Area. The entire valley floor, including US 395 and Gill Station Road, was inundated with silts and soils eroded by runoff from the Inyo Mountain range. These flood-borne materials remained in the low-lying areas after the floodwaters receded (see Figure 4.1). Although Caltrans and local owners cleaned up deep silt deposits from US 395 and Gill Station Road, the extensive deposits on the natural valley floor remained. These deposits dried and would later become significant sources of PM10 emissions during wind events, especially those events characterized by strong westerly winds driven down the east face of the Sierra Nevada range or those winds driven from the north from the Owens and northern Rose Valleys abrading the surface and entraining those deposits, adversely impacting the air quality of the valley.

Following the flash flood, elevated PM10 levels were monitored at the Coso Junction monitoring station when winds were greater than about 7 m/s. Impacts from these events have resulted in exceedances of the federal PM10 standard. The District requested exclusion under the Exceptional Event Rule for four (4) monitored federal PM10 exceedances (August 7, 2013; September 25, 2013; February 16, 2014; and April 25, 2014) at Coso Junction as the exceedances were associated with emissions from flash flood silt deposits, a natural event that was not reasonably controllable or preventable. The District provided a demonstration analysis and documentation and initial notification to request exclusion of data affected by the four events. The analysis showed the events affected air quality in such a way that there exists a clear causal relationship between the specific event and the monitored exceedances. The US EPA determined the events to be of no regulatory significance and deferred review of the events for consideration as exceptional.

PM10 air quality exceedances caused by flash flood events fall under the category of a natural event, which EPA defines as one in which human activity plays little or no direct causal role in the generation of emissions (40 CFR 50.1(k)). The "not reasonably controllable or preventable," criterion applies to natural events, including natural sources and any contributing anthropogenic sources and activities.

Figure 4.1 Satellite Imagery of Flood Deposits



Following the flash flood, Caltrans and property owners removed silt deposits from roads and road shoulders as a highway safety measure. This action helped to reduce dust emissions from roads and adjacent areas. The silt-laden flood waters spread much of the material into outlying undisturbed desert areas. Windblown dust emissions from undisturbed desert areas would be considered not reasonably controllable or preventable. Lower PM10 monitor concentrations in 2015 and subsequent years suggest that the flood deposits in the desert areas are in the process of being naturally stabilized through vegetation growth and surface crusting. Because reasonable steps were taken to prevent dust emissions from areas with human activity and the remaining dust emissions were coming from natural desert areas which EPA would consider not reasonably controllable or preventable, criterion 2 was satisfied. Therefore, this documentation primarily addresses the first criterion, that "the event affected air quality in such a way that there exists a clear causal relationship between the specific event and the monitored exceedance or violation."

Since the adoption of the 2018 Exceptional Event Mitigation Plan, there have been no subsequent exceedances caused by flash flood deposits. The area has recorded exceedances due to wildfire smoke events in 2020 and 2021 that the District identified and has documented as exceptional events.

# 5.0 Public Notification and Education Program: District's Health Advisory Program for Dust and Smoke

To notify and inform the public in an effort to help protect public health, the District issues Health Advisories when air pollution exceeds selected trigger levels based on District Rule 701, the District's Air Pollution Episode Plan. The District Rules and Regulations are available on the District's website at <a href="https://gbuapcd.org/rules">https://gbuapcd.org/rules</a>. Health Advisory notices are posted automatically to the District's website, <a href="https://www.gbuapcd.org/AirMonitoringData/HealthAdvisories/Past/">https://www.gbuapcd.org/AirMonitoringData/HealthAdvisories/Past/</a>, and are emailed or texted to individuals who have subscribed including local citizens, media outlets, schools, public officials, agency officials, and County Health Officers. The public can sign up for Health Advisories at the District's website, <a href="https://www.gbuapcd.org/AdvisorySignUp/">https://www.gbuapcd.org/AdvisorySignUp/</a>, as shown in Figure 5.1.

Per the District's Air Pollution Episode Plan (Rule 701), a Stage 1 air pollution Health Advisory is issued when hourly particulate pollution (PM10) levels at a community monitor exceed 400  $\mu$ g/m³ for dust and 100  $\mu$ g/m³ for wildfire smoke. During a Stage 1 Health Advisory the District recommends that children, the elderly, and people with heart or lung problems refrain from strenuous outdoor activities in the impacted area(s). A Stage 2 air pollution Health Advisory is issued when hourly particulate pollution levels at a community monitor exceed 800  $\mu$ g/m³ for dust and 200  $\mu$ g/m³ for wildfire smoke. With a Stage 2 Health Advisory the District recommends that everyone refrain from strenuous outdoor physical activities in the impacted area(s).

The District's Automated Health Advisory system is unable to automatically differentiate between dust and smoke influence without guidance. By default, alerts are sent as dust alerts. However, when a wildfire occurs in the region and smoke from the fire is deemed by District staff to have the potential to impact a monitor, a wildfire flag is manually applied to the District database by District staff so that when a PM Health Advisory threshold is met and a wildfire tag exists, the advisory is issued as a smoke advisory.

The District issues two types of Health Advisories, 1) automated advisories, and 2) manually developed advisories. Automated advisories are automatically broadcast when specific hourly PM concentrations are exceeded, as shown in Figure 5.1. Manually developed advisories are typically associated with long-lasting wildfire smoke events and issued when conditions warrant (generally a weekly frequency, occasionally daily) and contain text written by District staff containing specific detailed information about wildfire smoke sources and affected geographic areas, as shown in Figure 5.2.

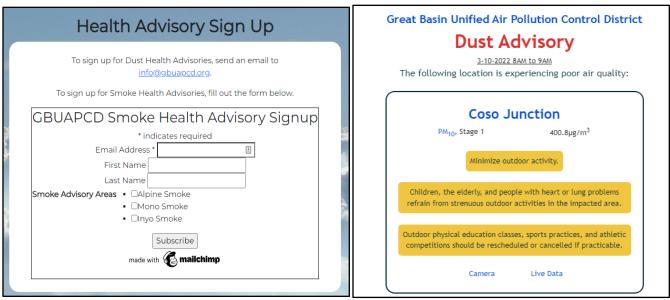


Figure 5.1 GBUAPCD Health Advisory Sign-Up (left), <a href="https://www.gbuapcd.org/AdvisorySignUp/">https://www.gbuapcd.org/AdvisorySignUp/</a> and Automated Health Advisory Email Notification (right)

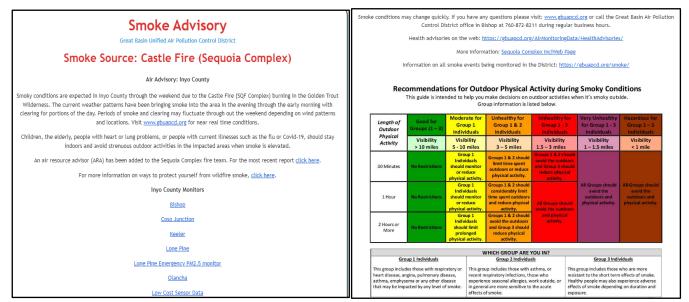


Figure 5.2 GBUAPCD Manually Generated Health Advisory - Wildfire Smoke Advisory Email

The District air pollution health advisory program is not intended to replace the need to control dust and smoke problems in the Eastern Sierra, but it is intended to minimize human exposure to the pollution and to help reduce adverse health effects until dust control measures are imposed and/or fully implemented or the event ends.

Additionally, the District's website contains information for the public regarding potential health effects of the

levels of dust and smoke (<a href="https://gbuapcd.org/AirMonitoringData/HealthAdvisories">https://gbuapcd.org/AirMonitoringData/HealthAdvisories</a>, Figures 5.2). There is also a link to additional information on particulate matter levels and health effects, sources of particulate matter, and descriptions of what is being done in the District to mitigate particulate levels at <a href="https://gbuapcd.org/AirMonitoringData/ParticulateMatter/">https://gbuapcd.org/AirMonitoringData/ParticulateMatter/</a>.

#### 6.0 Steps To Identify, Study, and Implement Mitigating Measures

The mitigation plan requirements of 40.CFR 51.930(b) requires detail on processes to collect and maintain data pertinent to an event. The District has several elements that are responsive to steps to identify, study and implement mitigation measures including the ongoing operation of the District air quality monitoring network, the District's additional monitoring activities, including emergency monitoring and air quality sensors,

#### **District Air Quality Monitoring Network**

The District collects data from its extensive air quality monitoring network. There are currently 17 permanent stations located throughout the District with one monitoring station in the Coso Junction Planning Area that collects PM10 and meteorological data. The data are polled hourly from the stations in the network are posted to the District's website at 18 minutes after every hour (see <a href="https://gbuapcd.org/Data">https://gbuapcd.org/Data</a>). The data are backed up daily to an offsite location and are retained in the District's database for five years and then the electronic files are archived indefinitely.

# <u>Additional Monitoring: Emergency Monitoring System, Portable Particulate Matter Monitors, Air Quality Sensors, and Air Quality Cameras</u>

The District maintains a fleet of E-BAMs, configured to monitor PM2.5 or PM10, that are used during wildfire events or other air quality events to monitor impacts in areas that are not covered by the District's permanent monitoring network. The E-BAMs are deployed as wildfires occur and either begin or are forecasted to impact communities within the District. The E-BAMs are prepared in advance of the wildfire season so that they can be deployed within hours of a wildfire beginning to impact a community. Data from the emergency monitors are also uploaded to the District's website on an hourly basis, and are also used in the District's health advisory system, so that people in the affected areas can get the information needed to determine their outdoor activity level. The E-BAMs may also be deployed in the event a permanent monitor goes down or for other types of air quality events.

The District has also installed low-cost Purple Air particulate matter (PM) monitors throughout the District to provide real-time data for District staff and the public including in the Coso PM10 Planning Area. The District continues to test other sensors and, in the future, could expand sensor monitoring for areas of concern.

Lastly, the District maintains a network of cameras to assist in capturing air quality data related to events. The cameras can be used in conjunction with permanent monitoring data, or other sensor data, or independently from to provide information regarding the presence or absence of air quality impacts, the possible sources of any impacts, and the duration of any impacts. The District air quality cameras are available for the public to view at <a href="https://gbuaped.org/cgi-bin/cameraViewer">https://gbuaped.org/cgi-bin/cameraViewer</a>.

#### **Measures to Abate or Minimize Controllable Sources**

Historically, Owens Lake has been the primary source of severe dust emissions in the Coso Junction PM10 Planning Area. The District has been involved in ordering the mitigation of the Owens Lake dust source areas, as documented and set forth in the 2016 Owens Valley Planning Area State Implementation Plan (2016 OVPA SIP) that was adopted on April 13, 2016. Dust controls have been implemented on Owens Lake in a phase by phase approach over the past two decades. The Coso Junction PM10 Maintenance Plan was promulgated in 2010 to address PM10 concerns of a more localized nature in the Rose Valley. As dust mitigation has been implemented on the emissive areas of Owens Lake by the City of Los Angeles Department of Water and Power, the number of monitored PM10 exceedances in the Coso Junction PM10 Planning Area from Owens Lake have dramatically reduced. As of 2023, Owens Lake has approximately 47.8 square miles of dust control. In recent years, Owens Lake has not been identified as the primary cause or a significant contributor to any PM10 exceedances at the Coso Junction PM10 monitor.

In addition to regulatory mechanisms to control dust on Owens Lake, there are District Rules and Regulations to address PM10 emissions from sources such as forest management burning, conservation management practices, and fugitive dust emission sources. A summary of the District rules and regulations that exist to control sources of PM10 is provided in Table 6.1. If the existing rules and regulations are insufficient to address PM10 emissions, the District may revise existing rules or adopt new rules and regulations.

Table 6.1. Existing District Rules and Regulations to Control Sources of PM10

Rule	Description
209-A	Standards for Authorities to Construct. Requires new sources with PM10 emissions greater than 250 pounds per day of total suspended particulates, or modifications of greater than 15 tons per year of PM10 to apply BACT to control PM emissions.
216	New Source Review Requirements for Determining Impact on Air Quality. Requires the Air Pollution Control Officer to evaluate air pollution impacts before issuing permits.
400	Ringelmann Chart. Limits visible emissions from any source, except those exempted under Rule 405, to less than Ringelmann 1 or 20%
401	<u>Fugitive Dust</u> . Requires reasonable precautions be taken to prevent visible particulate emissions from crossing the property boundary.
408	Open Burning in Agricultural Operations or Disease or Pest Prevention. Limits agricultural burning operations to designated burn days and requires a burn permit.
409	Range Improvement Burning. Limits range improvement burning to designated burn days and require a burn plan be approved by the Air Pollution Control Officer.
410	Forest Management Burning. Limits forest management burning to designated burn days and requires a burn plan be approved by the Air Pollution Control Officer.
502	Conservation Management Practices. Requires conservation management plans to reduce fugitive dust emissions from agricultural operations greater than 10 acres.
Reg. XII	<u>Transportation Conformity</u> . Ensures that Federal funding and approval are given to those transportation activities that are consistent with air quality goals and do not worsen air quality or interfere with NAAQS compliance.
Reg. XIII	General Conformity. Requires that federal actions and federally funded projects conform to SIP rules and that they do not interfere with efforts to attain NAAQS.

## 7.0 Summary and Mitigation Plan Periodic Review

The first Coso Junction exceptional events mitigation plan was prepared by the District in 2018. This document is an update as established in the original plan for periodic review and evaluation. The updated plan also includes discussion regarding wildfire smoke as the only exceptional events requested for the Coso Junction PM10 Planning Area in the past five years have been for wildfire smoke events. This exceptional events mitigation plan has been presented to the public for the statutory 30-day public review period before submission of the plan to the California Air Resources Board, who will review and submit to US EPA Region IX for approval. The District's submission to CARB will include all public comments received and the District responses. Per this update, subsequent review and update of this mitigation plan will take place every ten years. This interval is supported by the data showing a lack of exceptional event occurrences.

#### 8.0 References

GBUAPCD, 2010. Great Basin Unified Air Pollution Control District, 2010 PM10 Maintenance Plan and Redesignation Request for the Coso Junction Planning Area, May 17, 2010. Available at <a href="https://www.gbuapcd.org/District/AirQualityPlans/Coso/">https://www.gbuapcd.org/District/AirQualityPlans/Coso/</a>

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