Comment Letter #7
County of Riverside
November 14, 1996

COUNTY OF RIVERSIDE
TRANSPORTATION AND LAND MANAGEMENT AGENCY
Transportation Department

David E. Barnhart
Director of Transportation

DATE: November 14, 1996

TO: Larry Parrish, Chief Executive Officer

FROM: David E. Barnhart, Director Of Transportation

RE: Comments on SCAQMD Rules 403 and 1186

The South Coast Air Quality Management District recently released Proposed Amended Rule 403 and Proposed Rule 1186 for public comment. At your request, TLMA has provided the attached comments to the two rules for submittal to the SCAQMD. If you or your staff should have any questions or further requests please contact Jerry Jolliffe of the Planning Department at 275-3161 or John Ristow with Transportation at 275-6775.

jhr

Attachment

4080 Lemon Street, 8th Floor•Riverside, California 92501•(909) 275-6740
P. O. Box 1090•Riverside, California 92502-1090•FAX (909) 275-6721

0108

Comment Letter #7
County of Riverside
November 14, 1996

Proposed Rule 1186 - Emissions From Paved and Unpaved Roads and Livestock Operations
Proposed Amended Rule 403 - Fugitive Dust

Rule 1186

General Comment:

7-1 Riverside County is strongly opposed to this new Proposed Rule 1186. Implementation of this Rule will prove to be onerous, not cost effective and will impose great financial hardship on County road maintenance activities.

7-2 (d) (1) We request that the time frame for removal of material from roadways be made more flexible to accommodate jurisdictions such as Riverside County which are responsible for a very large, geographically dispersed roadway network.

7-3 (d) (2) We request that this requirement for purchase, lease or contract of "PM10 efficient" street sweepers be fully reviewed by street sweeping contractors and manufacturers to determine the operational effectiveness and cost of this type of sweeper prior to including this requirement in the proposed rule.

7-4 (d) (3) Option A
The option for posting 15 mph speed limit signs is in our opinion ineffective. Traffic violation enforcement on County roads is the responsibility of the California Highway Patrol and it is our understanding that unpaved roadways are not an enforcement priority.

Option B
Because of the need for rapid emergency vehicle response and because of safety and liability issues, it has been the policy of Riverside County to not allow installation of speed control devices on any roadway. Therefore, this option would not be available for control of dust on unpaved public roads within Riverside County.

Option C & D
The County of Riverside is opposed to this requirement for chemical treatment or paving of unpaved roads. This requirement will have a significant fiscal impact on Riverside County due to the large number of public unpaved roadways within the unincorporated rural areas. The County is currently responsible to maintain over 2600 miles of paved road system with very limited funding. Due to the limited funds available for basic road repair, many areas of the system have fallen behind acceptable standards for scheduled maintenance. The

7-1 The District has worked with local jurisdictions to reduce the cost and other impacts of this Rule. PR 1186 addresses entrained paved and unpaved road dust, which accounts for 65% of the fugitive dust emissions that affect public health. Please also refer to comment 2-5.

7-2 Staff concurs. The commentor is referred to response to comment 2-3.

7-3 Please refer to response to comment 1-2 and 3-3.

7-4 The commentor is referred to response to comments 1-4, 2-4, and 3-6.

C109

Comment Letter #7
County of Riverside
November 14, 1996

7-4 (cont.)		additional responsibility for establishing a 10 year improvement program for unpaved roads will only exacerbate the problem and cause further degradation to the existing heavily utilized paved road system, resulting in unsafe conditions.	
7-5	Rule 403		
	c) 19	For purposes of consistency we request that Rules 403 and Rule 1186 both use the same definition for "Paved Roads".	
7-6	(d) 1	Does "disturbed surface area" include unpaved public roads? If yes, is the requirement intended to include just those public unpaved roads which are included in an "active operation" or all unpaved roads in general? If the answer is no, we would request that the language in Rule 403 be further clarified to describe that required control measures only apply to unpaved roads which are part of "active operations".	
7-7	(h) 2 (B)	The provisions in this exemption appear to be inconsistent with Rule 1186. Could you provide more clarity as to how this exemption applies to unpaved public roadways.	

7-5 In response to the comment, the paved road definitions used in PAR 403 and PR 1186 have been made consistent.

7-6 The definition of disturbed surface area would include all unpaved roads, including those within active operations.

7-7 The exemption included in subparagraph (h)(2)(B) of existing Rule 403 was developed after consultation with the construction industry. Specifically, the construction industry stated that projects sometimes involve very low use unpaved roads adjacent to a property boundary where it would be virtually impossible to prevent visible emissions from crossing the property line. In response to this concern, staff developed a limited exemption for unpaved roads that meet all the criteria contained in clauses (h)(2)(B)(ii)(a) through (c) of Rule 403.

C110

DEC 06 '96 11:35AM WASTE RESOURCES MGMT

Riverside County
Waste Resources Management District
Robert A. Nelson, Chief Executive Officer

December 5, 19

Mr. Melvin Zeldin
Planning and Policy
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

RE: Amendments to Rule 403

Dear Mr. Zeldin:

The Riverside County Waste Resources Management District has reviewed the proposed amendments to Rule 403 and offers the following comments for your consideration:

8-1 1. In Table 1, the following language, "If there is any evidence of wind-driven fugitive dust..." should be added to measures 2A, 2C, and 1D. Measure 2B already states that "If there is any evidence of wind driven fugitive dust, watering frequency is increased to a minimum of four times per day". Control measures 2A, 2C, and 1D should be linked to evidence that the measures in Table 2 are insufficient before applying the Table 1 standards.

8-2 2. In Table 2, it is unclear what the categorical distinction is between disturbed surface areas which are completed grading areas and inactive disturbed surface areas. Also, control measure 2a/b requires that dust suppressants be applied in sufficient quantity and frequency to maintain a stabilized surface; and apply water at least twice per day to at least 80 [70] percent of all unstabilized disturbed surface areas. This measure is confusing; If the operator achieves a stabilized surface, why would it be necessary to water unstabilized areas? The District recommends that the item be rewritten as follows:

"Apply dust suppressants in sufficient quantity and frequency to maintain a stabilized surface. Any areas which cannot be stabilized, as evidenced by wind driven fugitive dust, should have an application of water at least twice per day to at least 80 [70] percent of the unstabilized area."

8-3 3. When the District filed its initial Fugitive Dust Plan in April 1993, it was permitted to use measure 3a in Table 1 to address disturbed surface areas. The District is concerned that the South Coast Air Quality Management District (SCAQMD) staff may be recommending that Table 1, measure 2a/b is required in addition to measure 3a. Even in its restated form, the additional watering which would be required would present a hardship for the District in equipment, personnel, and water costs. The District requests a response from the SCAQMD regarding this matter.

8-4 4. A related comment, which affects both Tables 1 and 2, is that some control measures (e.g., 1c and 3a) qualify that the measure does not apply to areas that are "inaccessible to watering vehicles due to slope conditions or other safety factors." This language should be added to other control measures, measures 2B and 2A being a few examples.

Thank you for the opportunity to comment. If you have any questions, please call Katherine Gifford at (909) 275-4387.

Sincerely,

Lesley Likins
Senior Planner

cc: Tony Carstens, County Executive Office
File (ref: P:\data\plng\sic\pm10\403.ltr)

1995 Market Street • Riverside, CA 92501-1719 • (909) 275-1370 • Fax (909) 275-1374 • Fax (909) 275-1334

C111

Comment Letter #8
County of Riverside
Waste Resources Management District
December 5, 1996

8-1 Table 1 of existing Rule 403 contains control actions that can be utilized during high wind conditions to obtain an exemption from paragraphs (d)(1) and (d)(4). The Table 1 control actions are more stringent than the Table 2 control actions because they are intended to reduce fugitive dust during high wind conditions. The commentators suggested rule text does not appear appropriate as active operations can generate PM10 emissions without evidence of wind driven fugitive dust.

8-2 In response to the comment, the text of PAR 403 has been amended with the suggested text.

8-3 It appears that the commentator is referring to the control actions specified in Table 2 as Table 1 does not list control actions 2a/b and 3a. Under the provisions of their existing dust control plan, Riverside County Waste Resource Management would not be required to implement additional Table 1 and 2 control actions but would be required to implement the BACM upgrades contained in PAR 403

8-4 The commentators suggestions do not appear warranted as the existing rule text accounts for situations where watering would be infeasible due to safety concerns.

NOV-15 96 14:15 FROM:TPCNHT 7146519548 TO:9093963252 PAGE:02

ORANGE COUNTY COUNCIL OF GOVERNMENTS

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November 15, 1996

Mr. Melvin Zeldin
Planning and Policy
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

Re: Proposed Amended Rule 403 and Proposed Rule 1186

Dear Mr. Zeldin:

On behalf of the Orange County Council of Governments Technical Advisory Committee, I am pleased to offer comments on the above referenced rules. Review of the proposed rule language has raised concerns regarding the implications for local government. Specific concerns are outlined below:

Track-out and Unpaved Roads

9-1
- The methods for controlling fugitive dust from unpaved roadways include paving and the use of chemical stabilizers. These control options have the potential to result in cross-media impacts, such as impacts to stormwater quality. These impacts should be considered as the Rule is finalized.

9-2
- Proposed Rule 1186 requires that 10 percent of qualifying unpaved roads be treated annually to minimize fugitive dust (section f.1). Please clarify rule language to indicate that implementation is based on 10 percent of the "miles" of qualifying unpaved roads to be treated annually.

9-3
- Recordkeeping requirements identified in Proposed Rule 1186 include documenting compliance with the mandates of the rule to treat qualified unpaved roads annually (section f.1). Monitoring and reporting requirements will likely result in an additional burden on staff and may have serious cost implications for local jurisdictions.

Post Event Clean-up

9-4
- Proposed Rule 1186 mandates that visible roadway accumulations shall be removed within 72 hours of the material being deposited (section d.1). Cities already respond to sediment deposits from storm events in the most expeditious manner possible. Storm events, which result in sediment deposits on roadways, create a number of other concerns ranging from roadway blockages to downed power lines and trees. Cities must have the ability to prioritize and respond to these issues in the best manner possible to ensure the safety of their citizens.
- Local jurisdictions may require funding support for the additional resources, such as staff and equipment, to ensure compliance with the mandated 72 hour timeframe to remove sediment.

Chair: Lauren Cash, Council Member, Fountain Valley; Vice-Chair: Richard Dixon, Mayor of Lake Forest; Members: Jan Debay, Mayor Pro Tem of Newport Beach; Sandy Genis, Council Member, Costa Mesa; Dan Slater, Council Member, City of Orange; Ron Bates, Council Member, Los Alamitos; Art Brown, Mayor Pro Tem of Buena Park; Bev Perry, Council Member, Brea; Wally Lim, Council Member, La Palma; Bert Dahl, Council Member, San Clemente; John Collins, John Chair, County Sanitation Districts of Orange County; Pamela Baker, Mayor of Laguna Niguel; Carolyn Hoppard, Council Member, San Clemente; Pat McGrath, Council Member, San Ana

0112

Comment Letter #9
Orange County Council of Governments
November 15, 1996

9-1 The commentor is referred to response to comment 1-4.

9-2 The text of PR 1186 has been revised in response to the comment. Please see response to comment 3-6 and the current rule language.

9-3 Please refer to response to comment 1-5.

9-4 Staff concurs. The commentor is referred to response to comment 2-3.

NOV-15 96 14:15 FROM:TPC&HT 7148519548 TO:9893963252 PAGE:03

Mr. Melvin Zeldin
November 14, 1996
Page 2 of 2

Street Cleaning

- Rule 1186 mandates the procurement of PM10-efficient street sweeping equipment after January 1, 1999 (section d.2). The limited number of studies conducted to assess the effectiveness of PM10-efficient street cleaning equipment in urban environments leads to uncertainties as to the effectiveness and technological feasibility of the proposed rule. Specific concerns relate to the sweepers' ability to pick-up large accumulations and the speed of the sweepers. We suggest exploring a variety of technologies to resolve these issues.

9-5

- The cost of a PM10-efficient street sweeper reflects a 31 percent cost increase over traditional sweepers. These additional costs will impose a serious financial burden on local government beginning in 1999. Funding support must be made available to assist local governments in transitioning to this new technology.

- Due to the importance of expanding the alternative fuel vehicle fleet in the South Coast Air Basin, the District should ensure that the PM10-efficient street cleaning equipment that is mandated in the Basin as a result of Rule 1186 can utilize alternative fuel technologies.

It is recommended that the SCAQMD conduct further analysis of the impacts of these Rules and assessment of control methods to ensure they are effective and technologically feasible prior to adoption.

9-6

The District should conduct targeted outreach efforts for rules which have direct implications for local governments, such as Proposed Amended Rule 403 and Proposed Rule 1186. In particular, the District should ensure that the appropriate city staff for all jurisdictions in the Basin are notified of Rule development and scheduled public workshops.

We appreciate the opportunity to comment on the proposed rules. If you have any questions regarding the comments, please feel free to contact me at (714)736-6564.

Sincerely,

Joel Rosen
Chair
Orange County Council of Governments
Technical Advisory Committee

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0113

Comment Letter #9
Orange County Council of Governments
November 15, 1996

9-5 The commentor is referred to response to comments 1-2 and 3-3.

9-6 As required under state law, the public consultation meeting, both public workshops, and the public hearing have been noticed in each of the four County's newspapers. Additionally, notices for each of the public meetings have been mailed to each of the jurisdiction's city mangers. Staff will be committed to additional outreach to local jurisdictions and others to aid in the most effective implementation of PR 1186.

NOV-13-1996 12:58 FROM ARB SSD AQMB & EAB T 916 327 8221324 P.01

STATE OF CALIFORNIA
ENVIRONMENTAL PROTECTION AGENCY
AIR RESOURCES BOARD

FAX TRANSMISSION

P.O. Box 2815
Sacramento, CA 95812
FAX: (916) 445-5023

Date:
Pages to follow: 1
For Transmission Problems: Cheryl Young, (916) 323-1069

Rule Review Comments

Please Deliver As Soon As Possible To:
Mr. Ed Pupka, Senior Enforcement Manager
South Coast Air Quality Management District
Telephone Number: (909) 396-3332
FAX Number: (909) 396-3324

From: Air Resources Board staff

The following draft rules, which were considered at a public workshop held by your District staff on October 29, 1996, were received by us on October 4, 1996, for our review:

Rule 403	Fugitive Dust (for amendment)
Rule 1186	PM_{10} Emissions from Paved and Unpaved Roads, and Livestock Operations (for adoption)

The Air Resources Board staff has reviewed Rule 403 and, based on the information available to us at this time, we have no comments. We have the comment on the following page regarding Rule 1186. We recommend that the District change Rule 1186 consistent with our recommendation before you present the rule to your District Board for adoption.

If you have any questions about our comment, please contact Mr. Dean Saito, Manager, Southern California Liaison Section, Office of Air Quality and Transportation Planning, Executive Office, at (916) 322-8279.

0114

Comment Letter #10
State of California
Environmental Protection Agency
Air Resources Board
December 1, 1996

NOV-13-1996 12:58 FROM ARB SSD ASMB & EAB T° 916 327 3621324 P.02

Date: November 13, 1996

Air Resources Board Staff Comments on
South Coast Air Quality Management District
Draft Rule 1186

Rule 1186, PM_{10} Emissions from Paved and Unpaved Roads, and Livestock Operations

1. Section (d)(3): This section of the rule requires that operators of public roads implement controls on at least 10% of their roads each year. This rule allows them to choose among the following actions: (1) paving the road, (2) applying chemical stabilization, (3) installing speed control devices such as speed bumps, or (4) installing speed signs that limit speed to 15 miles per hour.

10-1

We believe that the effectiveness of this rule could be considerably improved by limiting the use of speed signs as a control option to those roads with low local average daily travel (ADT)--150 ADT or less. We believe that achieving PM10 reductions through continued enforcement of speed limits will be much less effective than the application of physical constraints to the surface or stabilization of the road. Also the need for enforcement of speed limits to ensure compliance appears to make this an impracticle control option for heavily traveled roads. Our recommendation is consistent with the approach undertaken in the Coachella Valley portion of the South Coast Air District. The model fugitive dust rule and local ordinances specify that speed signs be utilized for those roads with ADT of 20-150, and chemical stabilization or paving be utilized for those roads with greater than 150 ADT.

The provision of the California Motor Vehicle Code which allows local jurisdictions in the South Coast to implement lower speed limits to reduce PM_{10} emissions is scheduled to sunset at the end of this year. Unless that provision is extended by legislation, this provision would no longer be enforceable. You may wish to add language to the rule which specifies that this provision is only available if local jurisdictions retain the authority under state law to implement lowered speed limits.

0115

TOTAL P.02

Comment Letter #10
State of California
Environmental Protection Agency
Air Resources Board
December 1, 1996

10-1 The District acknowledges that speed control will be less effective in reducing PM_{10} compared to unpaved road surface treatments. In response to the comment, the District has revised PR 1186 so that paving would be targeted for unpaved roads with higher average daily trips. The commentor is also referred to response to comment 3-6.

UNIVERSITY OF CALIFORNIA, RIVERSIDE

Planning & Policy

NOV 2 0 1996

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RIVERSIDE, CALIFORNIA 92521-0434

November 12, 1996

Mr. Melvin Zeldin
Planning and Policy
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, California 91765

RE: Proposed Rule 1186 -- PM_{10} Emissions from Paved and Unpaved Roads, and Livestock Operations

Dear Mel:

I have reviewed the Draft Staff Report for PR 1186 and attended the Public Workshop. There are several points that I would like to bring up that need to be addressed further:

11-1 1. The 80 percent reduction in PM_{10} cited in Appendix D (page D-5) when using vacuum based sweepers compared to broom sweepers was obtained using Coachella Valley "blowsand" rather than material typical of that found on an urban or suburban street in the SoCAB. Since blowsand contains very little silt compared to typical surface material on paved roads (less than one percent compared to 10-20 percent) there is considerable uncertainty whether the blowsand results can be extrapolated to typical usage in the SoCAB.

11-2 2. Appendix D also states that " PM_{10}-efficient street sweepers removed 99 percent of the street surface silt loading". These results are again directly applicable to Coachella Valley blowsand. It addition the 99 percent removal was for the total blowsand, not the silt component as Appendix D implies.

11-3 3. I see no physical basis for multiplying collection efficiency of blowsand by a relative sweeper efficiency to yield ""control effectiveness". The properties would be additive (amounts of PM_{10} prevented). Scaling factors would needed to properly weight one phenomenon with the other. If, for example, the amount of PM_{10} generated by the sweepers is very small compared to that prevented by removing debris from the street, then the component of PM_{10} control efficiency of the sweeper would also be insignificant.

11-4 4. PM_{10} emission rates that we have determined by measuring upwind-downwind concentrations of streets in the SoCAB are about five time smaller than those predicted from AP42 using measured silt loadings. In addition, measured silt loadings are about five time smaller than the default ones suggested in AP42. The difference in PM_{10} concentrations was near the detection limit of the instruments used. It is therefore not clear that paved roads are a significant source of PM_{10} as suggested in the Staff Report.

0116

Comment Letter #11
UC Riverside
College of Engineering-Center for Environmental Research and Technology
November 12, 1996

11-1 Staff appreciates both the comments and supporting material supplied by the commentor. Since the original public workshop, draft PR 1186 rule language has been revised to reflect these and other comments. PR 1186 seeks an incremental increase in the PM_{10} efficiency of street sweepers. Based on EPA guidance and Coachella Valley Sweeper Study, staff believes that sweepers with greater PM_{10} efficiency are currently available and has used the latest study to estimate the effectiveness. Staff is committing to work with sweeper manufacturers and researchers to improve the efficiency estimates and to work toward sweeper efficiency standards (please see response to comment 3-3).

11-2 The staff report reflects that the 99 percent removal was for total surface loading, silt and other material combined.

11-3 The 99 percent removal accounts for the material removed from the road surface. The 80 percent efficiency (PM_{10}-efficient compared to typical broom sweepers) refers to the percentage of material removed from the surface that is retained in the sweeper as opposed to released into the air.

11-4 The entrained paved road dust emissions inventory is based on the results of the latest studies on this source, including the 1995 Midwest Research Institute (MRI) Report, "Improvement of Specific Emission Factors," and the Fugitive Dust Integration Project. It is based on Basin-specific silt loadings, which are indeed 4 to 7 times smaller than the AP-42 defaults. Even with these lower silt loadings, paved road dust contributes almost 50% of the fugitive dust emissions in the base year of 1993 (166 tons/day). It is the greatest contributor to fugitive dust in the Basin.

Mr. Melvin Zeldin
November 12, 1996
Page Two

11-5 5. Preliminary results of our measurement of the effectiveness of street sweepers in controlling PM_{10} emissions from paved roads showed that sweeping did not significantly change these rates or the surface silt loading.

11-6 6. We found that a vacuum-based sweeper did not work well in sweeping a really dirty street. Clouds of dust were generated and little of the dirt was picked up. We used a broom sweeper to clean up the mess and ran the vacuum sweeper over it again (after the operator apparently "fixed" it). Clouds of dust were still generated.

11-7 I suggest that the adoption of the rule be postponed until current research is completed in order to better assess the cost-effectiveness of vacuum-based street sweepers. Additional evaluations of street sweeper are also needed to :

- Determine PM_{10} emission rates of various types of sweeper under actual operating conditions.
- Determine if vacuum-based street sweepers are fully capable of meeting all sweeping applications.

I hope that you consider these comments and suggestions. I would be pleased to discuss them in greater detail.

Sincerely,

Dennis Fitz
Manager, Atmospheric Processes

0117

Comment Letter #11
UC Riverside
College of Engineering-Center for Environmental Research and Technology
November 12, 1996

11-5 District staff has reviewed the preliminary results of the cited work. Revised rule language and conditions of the road and sweeper limit the generalization of these preliminary results. Staff is aware of the limitations of vacuum/air sweepers (all current PM_{10}-efficient sweepers are of this type) in dealing with trash and other bulky accumulations. PR 1186 targets those roads without curbs and gutters or without paved shoulders that are currently being swept, generally excluding the road conditions cited in the study.

11-6 Staff is aware of the operational limitations of vacuum/air sweepers on trashy and rarely traveled/swept surfaces. Efficiencies are achieved in large part, by internal designs that capture, rather than venting, fine particles.

11-7 Staff believes that the best available information shows that current PM_{10}-efficient street sweepers can incrementally reduce PM_{10} emissions compared to regular sweepers. However, staff concurs that additional research may improve the determination of sweeper effectiveness and lead to more quantitative standards and specifications for PM_{10}-efficient sweepers. Research could be an important component in the improvement of current sweeper technology. Staff is proposing that a working group to address these sweeper issues (further quantifying effectiveness, standard development, improving sweeper technology, etc.) be formed, comprised of sweeper manufacturers, sweeper operators, local jurisdictions, and researchers (please see response to comment 3-3).

Comment Letter #12
U.S.D.A. Forest Service
October 15, 1996

United States Department of Agriculture | Forest Service | Angeles National Forest | 701 N. Santa Anita Arcadia, CA 91006-2725 818-574-5209 Text (TTY) 818-574-1613 Voice

File Code: 2580 Fugitive Dust Planning & Policy

Date: October 15, 1996 NOV 2 0 1996

Melvin D. Zeldin
Planning Manager
South Coast Air Quality Management District
21865 E. Copley Drive
Diamond Bar, CA 91765-4182

Dear Mr. Zeldin

12-1 Thank you for the opportunity to comment on the revision of Rule 403 - Fugitive Dust - and Rule 1186 - Roadway Emissions. We believe application of these rules to National Forest Lands would not be cost effective, we are therefore requesting an exemption from both rules for the following reasons: (1) The available data do not indicate that National Forest Lands represent a source of PM10 loading to the metropolitan areas of concern. Quite the contrary, the National Forest Lands represent areas of decreased concentration. (2) The National Forests generally boarder the Air District at elevations considerable above those of the metropolitan areas and with prevailing wind patterns that carry pollutants into the Forests rather than into the South Coast Air Basin from the Forests. (3) A majority of the unpaved roads on the National Forest Lands have limited use and are designed and/or maintained at levels that result in actual road speeds of less than 15 mile per hour, a recommend mitigation measure.

We appreciate your consideration of these facts and would be please to work further with you on this issue. Please contact Mike Mc Corison at this office if you have any questions.

Sincerely,

MICHAEL J. ROGERS
Forest Supervisor
Angeles National Forest

cc Anne Fege - CNF
Bob Zimmerman - SBF

Caring for the Land and Serving People

0118

12-1 In response to the concerns over the contribution of PM_{10} from unpaved roads in elevated terrain (that does not show PM_{10} exceedances), PR 1186 exempts unpaved roads 3,000 feet above mean sea level that experience fewer than 500 average daily trips. Unpaved roads that are designed and/or maintained in such a manner that results in actual road speeds of less than 15 miles per hour would be in compliance with the provisions of PR 1186 paragraph (d)(3).