



South Coast Air Quality Management District

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March 23, 2005

Ms. Christina Tran
County of Los Angeles Dept. of Regional Planning
Impact Analysis Section
320 West Temple Street
Los Angeles, CA 90012

**Draft Mitigated Negative Declaration for the Proposed Surface Mining Permit Application for
2 Quarry Areas Totaling 17-Acres – Los Angeles County Department of Regional Planning**

On November 25, 2003, the South Coast Air Quality Management District (SCAQMD) commented on the above-mentioned document and subsequent to that letter, further correspondence between the lead agency and the SCAQMD staff occurred in a letter dated May 1, 2004 from Pacific Industrial Minerals, LLC responding to the SCAQMD's November 25, 2003 letter.

The lead agency's responses to the SCAQMD's comments are generally unresponsive. The SCAQMD's November 25, 2003 comments remain valid. The lead agency provided the detailed URBEMIS 2001 printouts, but operational emissions continue to exceed the SCAQMD's recommended significance thresholds for ROG, NOx, CO and PM10. Further, the land use category chosen, manufacturing, is for facilities that manufacture finished product from raw materials. Therefore, emissions from typical mining operations such as earth moving, pushing, hauling, etc., are not captured by the URBEMIS model and should be calculated separately for the proposed project. As a result, it is likely that operational emissions are substantially underestimated.

This letter also concludes the SCAQMD's review of the proposed project. If you have any questions, please contact me at (909) 396-3054 if you have any questions regarding these comments.

Sincerely,

Steve Smith, Ph.D.
Program Supervisor
Planning, Rule Development & Area Sources

Attachments
SS:GM
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