



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

FAXED: MAY 13, 2005

May 13, 2005

Ms. Kim Szalay
Los Angeles County
Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012

Dear Ms. Szalay:

**Negative Declaration for Project No. R2004-0089,
31527 Castaic Road. April 2005**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document along with the architectural drawings. The following comments are meant as guidance for the Lead Agency and should be incorporated in the Final Negative Declaration.

Please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Negative Declaration. The SCAQMD would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Charles Blankson, Ph.D., Air Quality Specialist – CEQA Section, at (909) 396-3304 if you have any questions regarding these comments.

Sincerely

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

Attachment

SS: CB

LAC050422-04
Control Number

**Negative Declaration for Project No. R2004-0089, 31527 Castaic Road:
April 2005**

1. **Project Air Quality Emissions:** Responses to the Environmental Checklist questions provide little or no information either to explain the rationale or support the conclusion to prepare a negative declaration. Responses such as “unknown” or “not likely” are unacceptable and do not provide any information by which to evaluate the project’s air quality impacts. Please note that without providing a quantitative analysis of potential emissions from construction and operation using the analysis methodologies in the SCAQMD’s 1993 CEQA Air Quality Handbook (Handbook) or other approved methodologies, the lead agency has not demonstrated that the project’s air quality impacts are not significant. Alternatively, the lead agency may consider using California Air Resources Board (CARB) computer model URBEMIS 2002 to estimate the project’s construction and operational emissions. The model can be obtained at the SCAQMD website: www.aqmd.gov/ceqa/models.html. If quantification of emissions reveals that the project’s emissions exceed the established significance thresholds, then mitigation measures must be required by the lead agency to reduce those emissions to less than significance.

2. **Diesel Truck Emissions:** The proposed project seeks to construct and operate a 24-hour truck stop with other supporting land uses. As a truck stop, the project site would attract some amount of truck traffic. CARB has designated diesel particulates from trucks as a carcinogen. It is therefore important that the truck traffic as well as the project’s air quality impacts are adequately analyzed to determine whether or not mitigation would be required. Depending on the volume of truck traffic that would be generated by the proposed project, the SCAQMD recommends that the lead agency perform an air toxics health risk analysis of the diesel particulate emissions. This is a particularly necessary analysis because, according to item 2b., there may be sensitive uses near the proposed project. The SCAQMD has prepared interim guidance for preparing such an analysis, which can be accessed at the SCAQMD website: www.aqmd.gov/ceqa/handbook.html under Health Risk Assessment Guidance.

3. **Mitigation Measures:** Since the air basin is currently designated as non-attainment for both the federal and state ozone, carbon monoxide and particulate matter (PM10) standards, it is important that the lead agency ensure the implementation of any measures which would help reduce any of these criteria pollutants. The following measures are recommended for the lead agency to consider where applicable or feasible:
 - For construction equipment, require the use of alternative clean fuel such as compressed natural gas-powered equipment with oxidation catalysts instead of diesel-powered engines, or if diesel equipment has to be used, use particulate filters, oxidation catalysts and low sulfur diesel as defined in AQMD Rule 431.2, i.e., with less than 15 ppm sulfur content.

- Trucks hauling dirt, sand, gravel or soil are to be covered or shall maintain at least two feet of freeboard in accordance with Section 23114 of the California Vehicle Code.
- Pave parking areas and construction access roads to the main roads to avoid dirt being carried on to the roadway.
- Use alternative-fueled yard tractors and other service equipment.
- Provide electrical sources for docking of trucks.
- Restrict idling emissions by using auxiliary power units and electrification.
- Enforce truck parking restrictions.
- Improve traffic flow in the project vicinity through signal synchronization.
- For the convenience store and restaurant, use light-colored roof materials to deflect heat.
- Also use double-paned windows in the facility housing the convenience store and restaurant to reduce thermal loss.
- Install central water heating systems to reduce energy consumption, and
- Install energy-efficient appliances to reduce energy consumption.

Other mitigation measures for consideration by the lead agency can be found in Chapter 11 of the Handbook.