



South Coast Air Quality Management District

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FAXED: June 16, 2006

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

Draft Mitigated Negative Declaration (Draft MND) for the Proposed Project No. TR064989/RENV200600022/RCUPT200600020/ROAKT2000600011 in Canyon Country

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

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final Negative Declaration. The SCAQMD staff would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

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

Attachment

SS:GM

LAC060524-04
Control Number

Construction Emissions

Cut and Fill Construction Operations

1. In the project description, the lead agency estimates that 38,655 cubic yards (CY) of cut and 52,582 CY of fill, along with a net import of 13,926 CY of fill would be needed during the site preparation phase of construction for the proposed project. Although described in the text on pages 8 and 9 of the Air Quality Analysis, the estimated emission impacts from cut, fill, and import of soil are not accounted for in Table 4 (Estimated Daily Construction Emissions) and the URBEMIS 2002 output sheets attached in the back of the Air Quality Analysis. Sufficient information is also provided in the Draft MND regarding cut and fill, as well as the amount of soil transported to the site, that, at a minimum a Level 2 site grading analysis should have been performed to account for the emissions from the cut and fill operations. Since the associated emissions from PM10 (fugitive dust), on- and off-road equipment, and worker trips are not shown in the Draft MND, the construction emission estimates are substantially underestimated.

Architectural Coating Emissions

2. In the URBEMIS 2002 output sheets on page 8, the lead agency has included the user defined mitigation measure "Rule 1113" using an 80 per cent control efficiency to reduce volatile organic compound (VOC) emissions from architectural coating during the Phase 3: Building Construction Phase. Since the URBEMIS2002 model uses an architectural coating default of 250 grams per liter (gm/l) using the mitigation measure of controlling architectural coatings by 80 percent means that architectural coatings use for the proposed project could not exceed 50 gm/l. If this is the lead agency's intent, then Mitigation Measure AQ-2 on page 10 of the Draft MND should be changed to require the use of architectural coatings with a VOC content limit not to exceed 50 gm/l.

Other measures to mitigate architectural coating emissions include, but are not limited to the following:

1. Construct/build with materials that do not require painting.
2. Contractors shall use high-pressure-low-volume (HPLV) paint applicators with a minimum transfer efficiency of at least 50 percent.
3. Restrict daily coating usage based on VOC content of the coating used, e.g., to less than approximately 65 gallons per day assuming a VOC content of approximately 125 gm/l, etc.

Construction Mitigation Measures for PM10 (Fugitive Dust)

3. Recommended changes to measures under AQ-1 on page 10:

The following changes are recommended to reduce fugitive dust:

- Portions of the construction site that have been graded and left undeveloped for ~~8 weeks~~ ten days or more shall be seeded and watered until vegetation cover is grown;
- All clearing, grading, earth moving or excavation activities ~~should~~ shall cease during periods of high winds (i.e., wind speeds greater than 20 mph measured averaged over one hour as instantaneous gusts) so as to prevent excessive amounts of dust;

Recommended additions to reduce fugitive dust:

- Install wheel washers where vehicles enter and exit the construction site onto paved roads or wash off trucks and any equipment leaving the site each trip.
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation.
- Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more).
- Apply water three times daily, or non-toxic soil stabilizers according to manufacturers' specifications, to all unpaved parking or staging areas or unpaved road surfaces;
- Pave road and road shoulders;
- Sweep streets at the end of the day using SCAQMD Rule 1186 certified street sweepers or roadway washing trucks if visible soil is carried onto adjacent public paved roads (recommend water sweepers with reclaimed water);

Localized Significance Thresholds (LST) Analysis

4. The lead agency should be aware that the LST look-up tables were developed to be used for projects five acres in size or less. Since the proposed project is comprised of 29.15 acres and grading would occur on 10.46 acres, dispersion modeling should have been performed.