



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Mitigated Negative Declaration (MND) for the Proposed Lakeland Apartments

The South Coast Air Quality Management District (SCAQMD) staff 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 MND.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to seven buildings totaling 170,082 square feet with a total of 128 residential units on 5.13 acres (Proposed Project). Construction is expected to take approximately 15 months¹.

SCAQMD Staff's Summary of Air Quality Analysis

In the Air Quality Analysis Section, the Lead Agency quantified the Proposed Project's construction and operation emissions and compared them to SCAQMD's regional and localized air quality CEQA significance thresholds. The Lead Agency found that the Proposed Project's air quality impacts from construction and operation would be less than significant.

SCAQMD Staff's Comments

According to Table 3-3, *Local Significance Thresholds Exceedance SRA 5*, in the MND, the Proposed Project's localized air quality impacts from PM10 emissions would be 9.83 pounds per day (lbs/day), which would exceed SCAQMD air quality CEQA localized air quality significance threshold of 7 lbs/day for SRA 5 at 25 meters². The Lead Agency stated that since "only one [SCAQMD] Rule 403 mitigation measure is included and calculated within the CalEEMod air quality model (watering of dirt surfaces three times daily) [...], the exceedance of PM10 construction emissions within Table 3-3 does not accurately represent the actual PM10 emissions³."

SCAQMD staff recommends that the Lead Agency use the best efforts to find out and disclose the actual PM10 emissions in the Final MND. Should the localized PM10 emissions exceed SCAQMD air quality CEQA localized air quality significance threshold of 7 lbs/day for SRA 5 at 25 meters, feasible mitigation measures are required. To reduce particulate matter emissions, SCAQMD recommends that the Lead Agency incorporate the following mitigation measure in the Final MND to reduce localized PM10 impacts on nearby residents to the greatest extent feasible.

Recommended Mitigation Measure: SCAQMD staff recommends that the Lead Agency use off-road diesel-powered construction equipment that meets or exceeds the CARB and USEPA Tier 4 off-road emissions standards for equipment rated at 50 horsepower or greater during Project construction. Such equipment will be outfitted with Best Available Control Technology (BACT) devices including a CARB

¹ MND. Page 26.

² MND. Page 48.

³ *Ibid.*

certified Level 3 Diesel Particulate Filters (DPF). Level 3 DPFs are capable of achieving at least 85 percent reduction in particulate matter emissions⁴. A list of CARB verified DPFs are available on the CARB website⁵. These requirements shall be included in applicable bid documents and successful contractor(s) must demonstrate the ability to supply such equipment. A copy of each unit's certified tier specification or model year specification and CARB or SCAQMD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment. In the event that construction equipment cannot meet the Tier 4 engine certification, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is approved by the Lead Agency before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, reduction in the number and/or horsepower rating of construction equipment, limiting the number of daily construction haul truck trips to and from the Project, using cleaner vehicle fuel, and/or limiting the number of individual construction project phases occurring simultaneously.

Conclusion

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. Please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final MND. When responding to issues raised in the comments, response should provide sufficient details giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful or useful to decision makers and to the public who are interested in the Proposed Project.

SCAQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact me at lsun@aqmd.gov if you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

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⁴ California Air Resources Board. November 16-17, 2004. *Diesel Off-Road Equipment Measure – Workshop*. Page 17. Accessed at: https://www.arb.ca.gov/msprog/ordiesel/presentations/nov16-04_workshop.pdf.

⁵ *Ibid*. Page 18.

