



South Coast Air Quality Management District

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

FAXED: December 8, 2005

December 8, 2005

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

Subject: Air Quality and Health Risk Analysis for the Negative Declaration for Project No. R2004-0089, 31527 Castaic Road, April 2005

Dear Mr. Szalay:

South Coast Air Quality Management District (SCAQMD) staff has reviewed the Air Quality and Health Risk Analysis for the Negative Declaration dated September 2005 for Project No. R2004-0089, 31527 Castaic Road, April 2005. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final Negative Declaration. The lead agency did not respond to all of the written comments in SCAQMD staff's previous comment letter. Specifically, the Lead Agency did not address mitigation measures suggested by SCAQMD staff.

SCAQMD staff has reviewed the Air Quality and Health Risk Analysis and has found that the emission and risk estimates and impact were not based on standard SCAQMD methodology. SCAQMD staff recommends that the lead agency reevaluate the assumptions used for the air quality analysis and revise the health risk assessment to reflect a worst-case condition – consistent with CEQA and HRA Guidelines – in order to adequately characterize the criteria pollutant and air toxic impacts that would be generated by the proposed project.

Specific responses to the Air Quality and Health Risk Analysis comments are attached. Please provide SCAQMD staff with written responses to all comments contained herein prior to the certification of the Final Negative Declaration. Please contact me at (909) 396-3105 if you have any questions regarding these comments.

Sincerely,

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

Attachment

SS:JK

LAC05422-04
Control Number

**Air Quality and Health Risk Analysis for the Negative Declaration for Project No. R2004-0089,
31527 Castaic Road, April 2005**

Emission Estimates

- The emissions for combustion from construction equipment were estimated using the ARB certified engines emission factors. Since construction equipment are often leased, the emission should have been calculated using fleet average emission factors from the ARB Offroad model. However, the estimated emissions reported are greater than those that would have been estimated using the fleet average emission factors from the ARB Offroad model so no change is required.
- Fugitive dust emissions from construction were not estimated. Fugitive dust emissions should be estimated and included in the results and compared to the appropriate significance threshold.
- Delivery truck emission factors were used to estimate criteria emissions from trucks at the truck stop. Heavy-duty truck emission factors should be used to estimate emission from trucks at the proposed projects. Heavy-duty truck emission factors can be found on the SCAQMD website at http://www.aqmd.gov/ceqa/handbook/onroad/onroadHHDT05_25.xls.

Localized Significance Thresholds

- A localized significance evaluation was not completed for construction emissions. A localized significance evaluation should be completed to verify that the proposed project is not significant for localized NOx, CO and PM10 adverse impacts. Localized significance threshold methodology is presented on the SCAQMD website at <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>.

Health Risk Assessment

- The rural dispersion coefficient and calms processing routine were used to estimate concentrations in the air dispersion model. SCAQMD staff requires that the urban dispersion coefficient is used and that the calms processing routine is bypassed for all air dispersion modeling for proposed projects within SCAQMD jurisdiction. Air dispersion modeling should be repeated with the urban dispersion coefficient and the calms processing routine bypassed. Risk assessments for the SCAQMD should follow the methodology presented on the SCAQMD webpage at: <http://www.aqmd.gov/prdas/Risk%20Assessment/RiskAssessment.html> and http://www.aqmd.gov/prdas/ab2588/AB2588_B3.html.
- The receptor grid in the dispersion modeling input file does not match the receptor grid presented in Figure 2. It is unclear which is correct or whether the correct concentrations were used in the health risk assessment; therefore, it is not clear that the health risk impacts are characterized correctly.
- A map that shows the proposed project site and the surrounding area such that the sensitive receptors can be identified is not included. Since this map was not provided, SCAQMD staff could not determine whether the receptor grid was modeled correctly.
- The Thomas Guide map included in the Air Quality Study and Health Risk Assessment shows a school between the site and the risk area. Since the school is between the site and the receptor grid with concentrations reported at 9.8 in one million, it is not clear that the propose project would not generate significant risk at the school.