



# South Coast Air Quality Management District

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**FAXED: SEPTEMBER 2, 2005**

September 2, 2005

Ms. Heather Waldstein  
City of Santa Clarita  
Planning Department  
23920 Valencia Boulevard, Suite 300  
Santa Clarita, CA 91355-2196

**Draft Environmental Impact Report (DEIR) for  
The Keystone Project (July 2005)**

Dear Ms. Waldstein:

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 in the Final Environmental Impact Report.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Environmental Impact Report. 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

LAC050720-01  
Control Number

### **Draft Environmental Impact Report (DEIR) for The Keystone Project (July 2005)**

**General Plan Consistency with the AQMP:** The lead agency states on page V.C-12 of the DEIR that the “implementation of the Proposed Project would not directly or indirectly induce substantial population or employment growth beyond current growth projections established by the Southern California Association of Governments (SCAG) for the Santa Clarita Valley and City of Santa Clarita.” Therefore “the Proposed Project would be consistent with the AQMP employment forecasts for the City of Santa Clarita and the Santa Clarita Valley, and it would not jeopardize attainment of State and national ambient air quality standards in the Basin and the Los Angeles County portion of the Basin.”

SCAQMD staff believes that the above statement is misleading and therefore disagrees with the conclusion regarding consistency with the AQMP for the following reasons. According to the information in Section I- Land use, the proposed site is designated as Residential Very Low (RVL). This designation allows only one dwelling unit per gross acre. Because the proposed project consists of 96 single-family residences, 667 multi-family condominium units and 216 multi-family apartments, these proposed residential densities greatly exceed the densities allowed by the City of Santa Clarita’s General Plan. As a result, the project proponent has applied to the City of Santa Clarita City Council for a General Plan Amendment to redesignate 52 acres of the proposed project area to Residential Suburban and 193.3 acres to Residential Medium High. Because the proposed project requires a General Plan amendment to increase residential density, the proposed project is not currently consistent with the City of Santa Clarita’s General Plan, and therefore, is not consistent with the AQMP.

#### **CO Hotspots Analysis**

- The CO hotspots analysis was completed using the BAAQMD simplified CALINE4 analysis. Page 37 of BAAQMD CEQA Guidelines states that the full CALINE4 model should be used for any projects or plans that will generate 10,000 or more motor vehicle trips per day. Page V.O-12 of the Keystone Project DEIR states that the proposed project would generate approximately 11,005 average daily trips. Based on the proposed project daily trips in the Draft EIR and the limitations of the BAAQMD simplified CALINE4 analysis, the Final EIR should include a CO hotspots analysis based on dispersion modeling completed with the full CALINE4 model.
- The reference note for the emission factors used in the CO hotspots analysis states that EMFAC2002 was used. The emission factors could not be verified since the EMFAC2002 output was not provided nor were the parameters used to develop the emission factors (e.g., geographical area (county, district or basin), temperature, relative humidity, etc.). Based on an EMFAC2002 run using Los Angeles County

data, an annual season, a temperature of 75°F, and a relative humidity of 40 percent, the average emission factors for the 2004 fleet appear to be underestimated. The Final EIR should include the EMFAC2002 output or parameters used to develop the emission factors.

- The highest traffic volumes estimated in the Simplified CALINE4 Carbon Monoxide Analysis spreadsheets in Appendix 2 of the Draft EIR do not appear to be estimated correctly. For example, the existing Sierra Highway and Golden Valley Road north south peak hour volume is estimated with both the approach and departure volumes ( $752 = (404 + 48) + (191 + 109)$ ). However, the east west peak hour volume of 2,323 could not be identified. The correct value for the east west approach and departure volumes should be 4,208 ( $4,208 = (191 + 145) + (109 + 1,583) + (145 + 48) + (1,583 + 404)$ ). The highest traffic volumes should be corrected in the Final EIR.
- All the receptors in the Simplified CALINE4 Carbon Monoxide Analysis spreadsheets begin at 25 feet from the edge of the roadway. Assuming that the roads have sidewalks this is not consistent with CALINE4 analysis. The BAAQMD Simplified Methodology was developed using CALINE4. Since the Simplified Methodology is based on CALINE4, receptor siting should follow the CALINE4 methodology, which is presented in the Caltrans Transportation Project-Level Carbon Monoxide Protocol (CO Protocol), Revised December 1997. The CO Protocol can be downloaded from the Caltrans website at <http://www.dot.ca.gov/hq/env/air/coprot.htm>. The CO Protocol states that receptors should be placed on sidewalks, which would be the at edge receptor in the BAAQMD Simplified Methodology. The Final EIR should include receptors placed at the edge of roadway.
- The peak hour traffic volumes for the existing roads were taken from the AM and PM turning movements in Figures V.O-3 and V.O-4. Similar figures for the future interim year with project traffic volumes were not included in the traffic section. Since peak hour turning volumes for the future interim year with project traffic volumes were not included in the Draft EIR, traffic volumes for the future interim year with project could not be verified. The Final EIR should include peak hour turning volumes for the future interim year with project.

**PM10 Mitigation Measures:** As part of the mitigated URBEMIS 2002 model run for grading, the lead agency has selected the following bulleted mitigation.

- Water active grading sites, unpaved roads or surfaces at least three times daily.
- Cover stock piles with tarps.
- Water haul roads three times per day.
- Apply soil binders to exposed piles, i.e. gravel, sand or dirt.
- Apply approved non-toxic chemical soil stabilizers to all inactive construction areas.
- Replace ground cover in disturbed areas.

These mitigation measures, however, are not listed as part of mitigation measure C-1 on pages V.C.- 20 and V.C.-21. These mitigation measures should be required by the lead

agency since the analysis uses them to mitigate PM10 emissions, and they should be listed in the DEIR along with the other mitigation measures under C-1.

Please add the following additional PM10 mitigation measures to the list mentioned under Section C-1 on pages V.C.- 20 and 21 if applicable and feasible:

- Trucks hauling dirt, sand, gravel or soil are to be covered or should maintain at least two feet of freeboard in accordance with Section 23114 of the California Vehicle Code.
- Construction access roads to the main roads should be paved to avoid dirt being carried on to the roadway.
- A construction relations officer should be appointed to act as a community liaison to oversee on-site construction activity and all emissions and congestion related matters.

**Operational Mitigation Measures:** The following are additional operational mitigation measures for the lead agency's consideration:

- Use light-colored roofing materials in construction to deflect heat away from buildings.
- Use double-paned windows to reduce thermal loss in buildings.
- Install solar panels on roofs to supply electricity for home-heating and cooling systems.
- Install automatic lighting on/off controls and energy-efficient lighting.