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Recirculated Initial Study/Draft Mitigated Negative Declaration (Recirculated IS/DMND) for the Proposed Fountain Place Villas (TR-71519)

The South Coast Air Quality Management District (AQMD) 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 CEQA document.

In the project description, the lead agency proposes the construction of 16 town homes at the northeast corner of Agoura Hills High School on a 1.3 acre site and widening of Easterly Road. Upon review of the URBEMIS2007 land use computer model and Table 3 on page 16 of the Recirculated IS/DMND, the emissions from construction of the proposed project exceed the recommended daily localized significance threshold for PM10. AQMD staff is concerned that these potentially significant localized air quality impacts from construction activities to sensitive receptors (i.e., the students and staff located at the school and residences located east of the project). AQMD staff therefore recommends that additional mitigation measures be considered as described in the detailed comments attached to this letter. Other mitigation measures to reduce the project's air quality impacts are also available at the AQMD website¹.

Please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. The AQMD staff is available 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.

¹ <u>http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html</u>

Sincerely,

lan V. Mr. Mill

Ian MacMillan Program Supervisor, Inter-Governmental Review Planning, Rule Development & Area Sources

IM:GM

LAC110610-02 Control Number

Construction Mitigation Measures

- Because the lead agency has determined that construction emissions for particulate matter (PM10) exceed the established significance threshold, the SCAQMD recommends the following mitigation measures, if applicable and feasible:
 - Install wheel washers where vehicles enter and exit the construction site onto paved roads or wash off trucks or any equipment leaving the site each trip;
 - Replace ground cover in disturbed areas as quickly as possible;
 - Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more);
 - Water active sites at least twice daily;
 - All trucks hauling dirt, sand, soil, or other loose materials are to be covered;
 - 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;
 - Traffic speeds on all unpaved roads to be reduced to 15 mph or less;
 - Sweep streets at the end of the day if visible soil is carried onto adjacent public paved roads using SCAQMD Rule 1186 certified street sweepers or roadway washing trucks (recommend water sweepers with reclaimed water);
 - Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 mph;
 - Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation;
 - Allow grading activities only when the school is closed;
 - Prohibit all vehicles from idling in excess of five minutes, both on-site and offsite; and
 - Reduce daily construction activity by prolonging the number of days for construction phases that exceed AQMD daily LST limits.