



South Coast Air Quality Management District

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Draft Mitigated Negative Declaration (Draft MND) for the Proposed Newhall Ranch Road Bridge Widening Project

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. The Lead Agency proposes to widen the bridge structure by 70 feet to accommodate eight through lanes of traffic.

In the Draft MND, the Lead Agency failed to adequately quantify the project's air quality emissions during both construction (demolition, grading, hauling) and operation. Appendix E of the Air Quality Analysis does not provide enough information to substantiate its model. The SCAQMD staff recommends that the Lead Agency provide additional details regarding diesel equipment used during construction, grading, and hauling.

Section 5.7.1 of the Air Quality Analysis does not quantify the operational emissions from the project. The SCAQMD staff recommends that the Lead Agency quantify the emissions and impacts from the increased daily trips.

Furthermore, even though the location of the proposed project is adjacent to sensitive land uses¹ (i.e., residential dwellings northeast and southwest of the project site), the Draft MND did not evaluate potential localized air quality impacts that could result from the construction and operation of the proposed project. Therefore, the SCAQMD staff recommends that the Lead Agency revise the air quality analysis to include an assessment of potential localized air quality impacts of the proposed project. These potential air quality impacts should be assessed using SCAQMD's Localized Significance Methodology and compared to the localized significance thresholds specific to the project area².

¹ California Air Resources Board. April 2005. "Air Quality and Land Use Handbook: A Community Health Perspective." Accessed at:<http://www.arb.ca.gov/ch/landuse.htm>

² The Localized Significance Threshold (LST) methodology and Mass Rate LST Look Up Table is available at:
<http://www.aqmd.gov/ceqa/handbook/LST/LST.html>

In response to the proposed mitigation measures, SCAQMD staff also recommends incorporating the following changes as indicated in strikeout/underlined text.

AQ-1: During clearing, grading, earthmoving, or excavation operations, excessive fugitive dust emissions will be controlled by regular watering or other dust preventive measures using the following procedures, as specified in the South Coast Air Quality Management District (SCAQMD) Rule 403. All material excavated or graded will be sufficiently watered to prevent excessive amounts of dust. Watering will occur at least twice daily with complete coverage, preferably in the late morning and after work is done for the day. All material transported on site or off site will be either sufficiently watered or securely covered to prevent excessive amounts of dust. The area disturbed by clearing, grading, earthmoving, or excavation operations will be minimized so as to prevent excessive amounts of dust. These control techniques will be indicated in project specifications. ~~Visible dust beyond the property line emanating from the project will be prevented to the maximum extent feasible.~~ Fugitive dust shall not remain visible beyond the property line of the emission source.

AQ-6: All construction vehicles both on- and off-site shall be prohibited from idling in excess of ~~10~~ 5 minutes.

The SCAQMD staff is available to work with the Lead Agency to address these concerns and any other air quality questions that may arise. Please contact Jack Cheng, Air Quality Specialist at (909) 396-2448, if you have any questions regarding these comments. We look forward to reviewing and providing comments for the Final IS/MND associated with this project.

Sincerely,

Barbara Radlein

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