South Coast
Air Quality Management District
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Draft Environmental Impact Report (Draft EIR) for the Proposed Lake View Estates Mixed Use Project

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 into the Final Environmental Impact Report.

Pursuant to Public Resources Code Section 21092.5, please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. The SCAQMD staff would be happy 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.

Sincerely,

Susan Nakamura
Planning & Rules Manager
Planning, Rule Development & Area Sources

Attachment

SN:GM

LAC090310-01
Control Number

Construction Air Quality Analysis

1. In the Air Quality Analysis in Appendix D of Volume II of the Draft EIR, the lead agency estimated operational air quality impacts using the URBEMIS 2002 version 8.7.0 computer model. The lead agency should be aware that the most current version of the URBEMIS model, URBEMIS2007, was released in September 2007. If the lead agency uses the model for future projects, the SCAQMD recommends that URBEMIS2007 be used. URBEMIS 2007 version 9.2.4 can be accessed at http://www.urbemis.com/ or the lead agency can follow the calculation methodologies in Chapter 9 and the Appendix to Chapter 9 in the South Coast AQMD's CEQA Air Quality Handbook. Should the lead agency conclude after its analyses that construction or operational air quality impacts exceed the SCAQMD daily significance thresholds, staff has compiled mitigation measures to be implemented if the air quality impacts are determined to be significant. Mitigation measure suggestions can be found at http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html .

2. In Volume II Appendix D Air Quality Calculations, the lead agency uses a maximum acreage disturbed per day of 7.2 acres as shown in the URBEMIS2002 output sheets but in Volume I on page 4.6-6, the lead agency uses 5 acres per day for the purposes of estimating localized significance thresholds (LST) and further states that construction activity would be limited to the 5 acre per day figure. This apparent discrepancy should be reconciled in the Final EIR, and if the lead agency is going to disturb an area larger than five acres during construction, then Table 4.6-4 should be also be revised and the maximum acreage disturbed per day figure should be consistently applied as applicable throughout the Final EIR. Finally, if the lead agency is going to limit the amount of soil disturbance to five acres per day as stated on page 4.6-6, then the lead agency should formally adopt that 5-acre per day limit as an enforceable mitigation measure and include that measure in the Final EIR.

Construction Mitigation Measures

3. In Section III. Air Quality on page 15 of the Draft MND, the lead agency proposes mitigation measures MM 3-2 and MM 3-3 (the use of diesel particulate filters and aqueous diesel fuel) to reduce NOx emissions from construction vehicles and equipment. In Appendix A (URBEMIS Air Quality Modeling), the lead agency has activated these measures as shown in the URBEMIS 2007 output sheets along with an additional measure, the use of cooled exhaust gas recirculation (EGR).

   It is recommended that the lead agency investigate the availability of off-road mobile sources equipped with EGR, diesel particulate filters, and aqueous diesel fuel and demonstrate that they are available for the proposed project. Currently, the availability of these technologies is relatively limited, so they may not be available for use by the project proponent. Until the lead agency can demonstrate the availability of the low emission technologies, the lead agency should turn off these mitigation measures and not take credit for control efficiencies associated with them.

Construction Mitigation Measures

4. Because the lead agency has determined that the proposed project's short-term air quality impacts are estimated to exceed established daily significance thresholds for nitrogen oxide (NO_x), particulate matter PM10 and PM2.5, the SCAQMD recommends that the lead agency consider adding additional mitigation measures to further reduce construction air quality impacts from the project, if applicable and feasible. Mitigation measure suggestions can also be found at http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html:

   Recommended additions:

   The following is a list of additional recommended mitigation measures to Mitigation Measures AQ-1(a) and AQ(c)(d) further reduce fugitive dust and NOx:

   Mitigation Measures for PM10 and PM2.5 Fugitive Dust:

   - Install wheel washers where vehicles enter and exit the construction site onto paved roads or wash off trucks and any equipment leaving the site each trip;
   - Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation;
   - Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more);
   - 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; and
   - Sweep streets at the end of the day if visible soil is carried onto adjacent public paved roads (recommend water sweepers with reclaimed water).

   Mitigation Measures for NOx:

   - Use electricity from power poles rather than temporary diesel or gasoline power generators;
   - Configure construction parking to minimize traffic interference;
   - Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow;
   - Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site. Require construction equipment that meet or exceed Tier 2 standards and equip construction equipment with oxidation catalysts, particulate traps and demonstrate that these verified/certified technologies are available;

- Prohibit all vehicles from idling in excess of five minutes, both on- and off-site;
- Schedule construction activities that affect traffic flow on the arterial system to off-peak hour to the extent practicable; and
- Reroute construction trucks away from congested streets or sensitive receptor areas.

Siting of Sensitive Land Uses Near Industrial Uses or High Traffic Roadways

5. On page 2-12 and in Figure 2-7 of the Draft EIR, the lead agency proposed project includes 70 residential units on 11.18-acres (RPD-2.5U); and just northeast of the proposed residential units, three office building lots on 5.21-acres (M-1-DP [Development Plan]) are planned for development on the 47.25-acre site. Although the lead agency states on page 2-15 that the project would involve "business/professional office uses," the M-1 land use category would also allow "light, medium, and heavy industrial uses with service commercial."

   The SCAQMD would recommend that the lead agency consult the California Environmental Protection Agency (CAL/EPA) and the California Air Resources Board (CARB) document: "Air Quality and Land Use Handbook: A Community Health Perspective (April 2005) "(Handbook), which cautions against siting projects that include sensitive land uses (schools, residences, playgrounds, convalescent centers, nursing homes, long-term health care facilities, etc.) close to industrial or commercial facilities or high traffic roadways and the associated emissions that may lead to adverse health effects beyond those associated with regional air pollution in urban areas. The SCAQMD recommends that sensitive receptors be properly distanced from incompatible land uses as defined in the CARB Handbook. The Handbook is available at the following website: http://www.arb.ca.gov/ch/landuse.htm .