



South Coast
Air Quality Management District

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Mr. Gregory Pfost, Deputy Planning Director
Department of Planning, Building and Code Enforcement
30940 Hawthorne Blvd.
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**Notice of Intent to adopt a Mitigated Negative Declaration (MND) for the
Crestridge Affordable Housing 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 Mitigated Negative Declaration (MND).

The SCAQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Dan Garcia, Air Quality Specialist – CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,

Steve Smith
Program Supervisor – CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS:DG
LAC090109-04
Control Number

Air Quality Analysis

1. In the draft MND the lead agency describes the project to include the subdivision of a 19.63-acre parcel into a 2.88-acre parcel (the proposed development parcel) and 16.75-acre parcel (the proposed open space parcel). On the development parcel the project construction consists of 52,315 cubic yards of grading, 23,400 square feet of residential space, 1,411 square feet of office and recreational space, a parking lot containing 59 spaces and five retaining walls that are up to 25 feet high.

In Section III of the draft MND the lead agency comments that the movement of soil and the operation of construction equipment have the potential to create construction-related air quality impacts upon nearby sensitive receptors. However, the lead agency does not quantify the construction-related or operational-related air quality impacts of the proposed project. Given that the draft MND does not quantify construction operational air quality impacts generated by the proposed project, the lead agency has not demonstrated that the projects air quality impacts are not significant.

SCAQMD staff requests that the lead agency calculate the proposed project's air quality impacts and, if any impacts are significant, identify and quantify the effectiveness of any necessary mitigation measures. To calculate the project's regional air quality impacts the lead agency can utilize the current URBEMIS 2007 land use emissions model, which can be accessed at <http://www.urbemis.com> or follow the calculation methodologies in Chapter 9 and the Appendix to Chapter 9 in the SCAQMD's CEQA Air Quality Handbook.

2. The project description and site aerial photo (Figure 2) provided in the draft MND indicate that the proposed project site is located within one-quarter mile of sensitive receptors (i.e. residential properties, an assisted living facility and a school site). Thus, the SCAQMD requests that when calculating the project's regional air quality impacts the lead agency also evaluate the localized air quality impacts and ensure that nearby sensitive receptors are not adversely affected by the construction activities that would be occurring in close proximity. SCAQMD guidance for performing a localized air quality analysis can be found at the following web address: <http://www.aqmd.gov/ceqa/handbook/LST/LST.html> .
3. In the event that the lead agency's air quality analysis requested in comment #1 and/or the localized air quality analysis requested comment # 2 demonstrate that any criteria pollutant emissions exceed the SCAQMD's daily significance thresholds, in addition to the mitigation measures identified on page 10 in the MND, the SCAQMD recommends that the lead agency consider adding the following mitigation measures to the final MND to further reduce air quality impacts from the construction phase of the project, if feasible:

NOx Mitigation Measures:

- Prohibit vehicle and engine idling in excess of five minutes and ensure that all off-road equipment is compliant with the California Air Resources Board's (CARB) in-use off-road diesel vehicle regulation and SCAQMD Rule 2449,

- Require construction equipment to meet or exceed Tier 3 standards with available CARB verified or certified technologies,
- Require the use of alternative fueled off-road construction equipment,
- Require the use electricity from power poles rather than temporary diesel or gasoline power generators,
- Require construction parking to be configured such that traffic interference is minimized,
- 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,
- Schedule construction activities that affect traffic flow on the arterial system to off-peak hours to the extent practicable,
- Reroute construction trucks away from congested streets or sensitive receptor areas,
- Improve traffic flow by signal synchronization, and

Fugitive Dust Mitigation Measures:

- Require the application of non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more),
- Install wheel washers where vehicles enter and exit the construction site onto paved roads or wash off trucks and any equipment leaving the site,
- Require all trucks hauling dirt, sand, soil, or other loose materials to be covered,
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation,
- When sweeping streets to remove visible soil materials use SCAQMD Rule 1186 and 1186.1 certified street sweepers or roadway washing trucks, and
- Replace ground cover in disturbed areas as quickly as possible.

For additional measures, refer to the mitigation measure tables located at the following website: www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html.

In addition to the suggested fugitive dust mitigation measures recommended above SCAQMD staff requests that the lead agency revise mitigation measure AIR-2 of the draft MND to be included in the final MND as follows:

- During Construction, all excavating and grading activities shall cease ~~during periods of high~~ when winds gusts (as instantaneous gusts) exceed (i.e., greater than 30 25 mph). To assure compliance with this measure, grading activities are subject to periodic inspections by city staff.

VOC Mitigation Measures

- Use coatings and solvents with a VOC content lower than that required under SCAQMD Rule 1113,
- Construct or build with materials that do not require painting, and
- Require the use of pre-painted construction materials.

4. Given the position of the legislature on AB32, which states that global warming poses serious threats to the environment, and the position of the California Attorney General's office on global climate change, it is incumbent on the lead agency to analyze greenhouse gas (GHG) emissions from proposed projects and determine whether the proposed project will have a significant GHG impact. By not making a significance determination, the lead agency may be violating a fundamental requirement of CEQA to mitigate potentially significant adverse impacts.