



# South Coast Air Quality Management District

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## **Review of Responses to Comments for the Final Environmental Impact Report for the Azusa Rock Quarry Revised Conditional Use Permit and Reclamation Plan**

The South Coast Air Quality Management District (AQMD) staff appreciates the opportunity to comment on the above-mentioned project. AQMD staff notes that the lead agency incorporated the majority of our previous comments into the Final Environmental Impact Report (Final EIR) and the Response to Comments (RTC) to the Final EIR. However, based on information contained in the recently released (May 13, 2010) Conditional Use Permit (CUP) and the Development Agreement for the project<sup>1</sup> AQMD staff requests that the lead agency consider the following points prior to approving the project.

First, one of the more significant modifications to mining operations proposed by the project proponent in the RTC includes an initial limitation on mining throughput until such time as the mining equipment can be updated to a newer and less polluting 2009 model year fleet. This includes a limitation of no more than 6,060 tons per day throughput, compared to the projections in the Final EIR of 19,000 tons per day. AQMD staff appreciates that the project proponent committed to reducing its throughput in order to keep emission levels below CEQA thresholds. However, this commitment does not appear to be enforceable unless it is contained in the Final EIR, the CUP, or the Development Agreement for the project. AQMD staff encourages the lead agency to make this condition enforceable by placing it in the CUP.

Second, in order to minimize emissions resulting from mining operations, the lead agency should specify a schedule that indicates when the mining equipment will be replaced. At a minimum, this schedule should include:

1. Encouraging the project proponent to apply to the AQMD Incentive Program (i.e., the "SOON" Grant Program) for funding to reduce emissions from off-road vehicles.<sup>2</sup>

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<sup>1</sup> [http://azusa.granicus.com/AgendaViewer.php?view\\_id=2&event\\_id=51](http://azusa.granicus.com/AgendaViewer.php?view_id=2&event_id=51) Accessed May 14, 2010.

<sup>2</sup> <http://www.aqmd.gov/tao/Implementation/SOONProgram.htm>

2. A commitment to meet the 2009 off-road fleet originally discussed in the Draft EIR by 2014.
3. A commitment to use the cleanest vehicles available at this quarry as the project proponent replaces vehicles in its fleet.

Third, the CUP specifies that blasting shall be suspended when winds exceed 25 mph as an hourly average. The definition of high winds in this condition must be revised to be consistent with AQMD Rules 1157 and 403 which specify that high winds are defined as instantaneous gusts of 25 mph.

Lastly, AQMD appreciates the potential funding opportunity for air monitoring equipment in the city of Azusa described in the Development Agreement. However, AQMD staff notes that the cost to assess potential impacts from this project on both Azusa residents and Duarte residents (i.e., two sites) may reach \$56,000 to establish each site, with an additional \$10,000 per year per site in operations and maintenance costs (not including labor or site property rental). AQMD staff requests that the project proponent provide full funding for these two monitoring stations.

Staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact either myself or Ian MacMillan, Program Supervisor, CEQA Intergovernmental Review, at (909) 396-3244 if you have any questions regarding the enclosed comments.

Sincerely,



for

Susan Nakamura  
Planning and Rules Manager