



South Coast
Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

FAXED: November 5, 2009

November 5, 2009

Mr. Eduardo Schonborn, AICP, Senior Planner
Department of Planning, Building and Code Enforcement
30940 Hawthorne Blvd.
Rancho Palos Verdes, CA 90275-5293

**Notice of Intent to adopt a Mitigated Negative Declaration (MND) for the
Nantasket Villas 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 lead agency failed to quantify criteria pollutant emissions during construction and operation. Without quantifying air quality impacts from the project, the lead agency is unable to support its conclusion that air quality impacts are not significant. Therefore, SCAQMD staff requests that the lead agency quantify all construction and operation air quality impacts, revise the CEQA document as appropriate, and recirculate the CEQA document for public review and comment. Staff is available to work with the lead agency to address these issues and any other questions that may arise. 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,

A handwritten signature in black ink that reads "Susan Nakamura".

Susan Nakamura
Planning Manager
Planning, Rule Development & Area Sources

Attachment

SS:EE:DG

LAC091006-05
Control Number

Air Quality Analysis

1. In the draft MND the lead agency describes the project to include approximately 4,028 cubic yards of grading to accommodate the construction of 4 single-family residences, which includes 1,957 cubic yards of cut and 2,071 cubic yards of fill. In Section 3 (Air Quality) of the draft MND the lead agency states that "...the Nantasket Residential development Project may result in some pollutant emissions from short term construction activities, construction related emissions would be temporary in nature and would not be considered to be significant..." and the lead agency identifies sensitive receptors surrounding the project. 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 and 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. Section 11 (Surrounding Land Uses and Setting) in the Environmental Checklist Form and site aerial photo (Figure 3) provided in the draft MND indicate that the proposed project site is located within one-quarter mile of sensitive receptors (i.e., residential properties). 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, and
- Improve traffic flow by signal synchronization.

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:

- AQ-2: During Construction the owner shall ensure that all clearing, grading, earth moving, ~~or excavating, grading and demolition~~ activities shall be discontinued ~~during periods of high~~ when winds (i.e., ~~greater than~~ exceed 30 25 mph), so as to prevent excessive amounts of dust. To assure compliance with this measure, grading activities are subject to periodic inspections by city staff.
- AQ-3: During construction of any improvements associated with the subdivision, the owner shall ensure that General contractors shall maintain and operate construction equipment according to manufacturers' specifications so as to minimize exhaust emissions.

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.