



South Coast
Air Quality Management District

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Community Development Department
City of San Dimas
245 East Bonita Avenue
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Draft Environmental Impact Report (Draft EIR) for the Proposed Brasada Residential Project (SCH #2010051020)

The South Coast Air Quality Management District (AQMD) 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.

AQMD staff is concerned that all feasible mitigation measures have not been considered to reduce the significant emissions associated with the extensive grading activities for this project. Additional mitigation measures that might reduce these emissions are described in the detailed comments attached to this letter.

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 AQMD 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,

Ian MacMillan
Program Supervisor, Inter-Governmental Review
Planning, Rule Development & Area Sources

IM:GM

LAC100921-01
Control Number

Construction Emissions

1. In Table 4.2-13 in the Air Quality section of the Draft EIR, the lead agency has determined that localized air quality construction impacts are significant assuming a maximum area disturbance of five acres and a 50-meter distance between receptors and construction activities. The lead agency based its determination using the SCAQMD mass localized significance thresholds (LST) for sites up to five acres. Since the lead agency has based its localized impacts analysis on a maximum soil disturbance of five acres per day and has used the mass lookup tables instead of performing a dispersion modeling analysis, the five acre per day maximum soil disturbance should be added to the construction mitigation measures listed on pages 4.2-19 and 4.2-20 in the Final EIR for enforceability.
2. During the demolition phase, the lead agency states that approximately 100,000 cubic feet of demolition would be required to demolish the existing caretaker's quarters, stable and barn. In the URBEMIS2007 output sheets, however, the lead agency has entered the total building volume of 100,000 cubic feet as an assumption for demolition, but appears that the emissions from this activity were not estimated as the modeling does not include inputs for the daily volume of buildings to be demolished or for the on-road truck emissions generated by hauling away debris. These additional demolition assumptions should be incorporated into the modeling and the revised emission estimates included in the Final EIR.

Construction Mitigation Measures

3. Because the lead agency has determined that construction phase emissions for nitrogen oxides (NOx) and particulate matter (PM10 and PM2.5, fugitive dust) exceed the established significance thresholds, the AQMD recommends the following additions to the mitigation measures listed starting on page 4.2-19 in the Draft EIR, if applicable and feasible. Additional measures are located at the following website: www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html .

Recommended additions:

NOx and PM (exhaust)

Consistent with measures adopted by other lead agencies, including the ports of Los Angeles and Long Beach, the lead agency should commit to the following schedule;

- Prohibit all diesel trucks from idling in excess of five minutes, both on-site and off-site;
- April 1, 2010, to December 31, 2011: All off-road diesel-powered construction equipment greater than 50 hp shall meet Tier 2 off-road emissions standards. In addition, all construction equipment shall be outfitted with the BACT devices

- certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 2 or Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations;
- January 1, 2012, to December 31, 2014: All off-road diesel-powered construction equipment greater than 50 hp shall meet Tier 3 off-road emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations;
 - Post-January 1, 2015: All off-road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations;
 - A copy of each unit's certified tier specification, BACT documentation, and CARB or AQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment;
 - Reroute construction trucks away from congested streets or sensitive receptor areas;
 - 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 hour to the extent practicable;
 - 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;
 - Schedule construction activities that affect traffic flow on the arterial system to off-peak hour to the extent practicable; and
 - All vehicles and equipment will be properly tuned and maintained according to manufacturers' specifications.

Particulate Matter (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;
- Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 mph;
- Pave road and road shoulders;
- 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;
- Sweep streets at the end of the day if visible soil is carried onto adjacent public paved roads (recommend water sweepers with reclaimed water); and
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation.

AQMD Rules

4. Demolition Activities Involving Asbestos Removal

On page 4.2-16 in the Air Quality section of the Draft EIR, the lead agency described proposed demolition activities including the demolition of various structures that have the potential for contact with asbestos. In the Final EIR, the lead agency should cite compliance with AQMD Rule 1403 – Asbestos Removal. Compliance with this rule would also include testing prior to demolition and AQMD approval of Rule 1403 plans prior to the beginning of these activities.

5. Large Operations Notification

Based on the project description, the lead agency states that the proposed project will include approximately 1.3 million cubic yards of earthwork during construction disturbing approximately 90 acres of the 273 total acre project site during mass grading. Although the lead agency describes compliance with AQMD Rule 403 – Fugitive Dust on page 4.2-10 in the Air Quality section of the Draft EIR, it also appears that the proposed project would fall under the requirements of Rule 403 for large operations according to AQMD Rule 403(c)(18). The lead agency should therefore submit to the AQMD Form 403N (Large Operation Notification Form) and contact AQMD engineering and compliance staff at (909) 396-2392.