



South Coast
Air Quality Management District
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September 7, 2011

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**Draft Mitigated Negative Declaration (Draft MND) for the Proposed
Walcott Estates Project (Tentative Tract Map No. 36295)**

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.

In the project description, the lead agency proposes to subdivide 25 acres into 45 single-family residential lots. Surrounding uses include sensitive receptors (i.e., single-family residences) adjacent to the proposed project site to the south. The AQMD staff requests that summary information included in any technical appendices also be included in the Final Draft MND to document the lead agency's findings. The AQMD staff also notes that the lead agency's computer modeling estimates for mitigated construction emission impacts may be underestimated due to a known computer error in the URBEMIS model. Further, the lead agency should estimate project localized construction air quality impacts in order to demonstrate that localized impacts to the existing sensitive receptors located just south of the proposed project site are less than significant. Finally, the AQMD staff recommends changes to the construction mitigation measures proposed on page seven of the Draft MND and additional measures to further reduce PM10 fugitive dust from construction activities. Detailed comments are included as an attachment to this letter.


Please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. The SCAQMD staff would be available to work with the Lead Agency to address these issues and any other air quality 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,

Mr. Matt Peters,
Associate Planner

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September 7, 2011

A handwritten signature in black ink, reading "Ian V. MacMillan". The signature is written in a cursive style with a large initial 'I' and 'M'.

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

Attachment

IM:GM

RVC110810-06
Control Number

Air Quality Analysis

1. In the Air Quality Section on page six of the Draft MND, the lead agency has determined that project air quality impacts would be less than significant with mitigation referring to the “Air Quality and Greenhouse Gas Study” (AQ Study) (Entech Consulting Group, January 2011). Upon request, the AQ Study was sent by the lead agency to the AQMD staff for review. In accordance with CEQA Guidelines §15150(c), the AQMD staff recommends that a summary of the information from the referenced document be included in the Final MND. Summary information should also be included in future CEQA documents as well. At minimum, the projected emission estimates could be shown in a table, described in the narration or included as an appendix.

Fugitive Dust Emissions From Construction Activities

2. In the AQ Study, the lead agency also estimated project construction and operational air quality impacts using the California Air Resources Board’s (CARB) URBEMIS2007 land use computer model. The URBEMIS2007 model outputs presented in the AQ Study include a variety of mitigation measures to control fugitive dust, including many identified on page seven of the Draft MND. Due to a known calculation error within the URBEMIS2007 model,¹ applying all mitigation measures results in an error resulting in higher dust control efficiencies than may be achievable in practice (e.g., about 77% for this project). In order to correct this error, AQMD staff recommends that the lead agency only include the single highest control measure in the URBEMIS model run. Depending on each project, this would be either the application of water three times per day or chemical suppressants. The higher resultant PM10 emissions may exceed AQMD’s regional or localized thresholds.

Localized Impacts

3. In the AQ Study, the lead agency estimated project impacts for regional and greenhouse air quality construction and operational activities but did not estimate localized construction or operational air quality impacts.² It is noted under surrounding land uses on page one and in an aerial map inspection that the proposed project is located adjacent to sensitive receptors (residential properties) south of the proposed project site. It appears from the URBEMIS2007 output sheets that localized construction activities could have significant air quality impacts to these sensitive receptors. Therefore, the SCAQMD requests that the lead agency evaluate localized air quality impacts to ensure that any nearby sensitive receptors are not adversely affected by the construction activities that are occurring in close proximity. Should the lead agency conclude after its analyses that construction localized air quality impacts exceed the AQMD daily significance thresholds, staff has compiled mitigation measures in addition to those measures listed on page seven of the Draft

¹ www.aqmd.gov/ceqa/models.html

² <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>

MND that can be implemented if the air quality impacts are determined to be significant.³

Construction Mitigation Measures

4. In the event that the lead agency determines that construction air quality impacts (see comments #2 and #3) are significant for PM10 fugitive dust, the lead agency should consider the following changes and addition to the mitigation measures listed on page seven of the Draft MND to further reduce project PM10 impacts, if applicable and feasible:

Recommended changes:

- Apply non-toxic soil stabilizers according to manufacturers' specifications to inactive areas (previously graded areas inactive for ten days or more).
- Sweep site access points within 30 minutes of any visible dirt deposition on any public roadway (recommend water sweepers with reclaimed water).
- Limit allowable idling to 405 minutes or less for trucks and heavy equipment.
- Suspend all excavating and grading operations on any unpaved surface if winds gusts (as instantaneous gusts) exceed 25 mph.
- Wet down or cover dirt haul routes with paving or gravel to prevent tracking of mud from exiting the construction site or from reaching or entering any type of storm water conveyance system on the site. 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.

Recommended addition:

- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation.

³ http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html