South Coast
Air Quality Management District
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**Draft Mitigated Negative Declaration (Draft MND) for the Proposed Tentative Parcel Map. No. 069664; CUP No. 200800198 Located at Burlwood Drive at Hasley Canyon Road in Castaic**

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. In the Air Quality Section on page 10, the document states that the proposed project is located within the jurisdiction of the Antelope Valley AQMD. Upon map review, the proposed project site is within the boundaries of the South Coast AQMD located in Source Receptor Area 15 just west of Castaic in Los Angeles County. Therefore the South Coast Air Quality Management District (AQMD) staff submits the following comments 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 Draft Mitigated Negative Declaration's (Draft MND) project description, the lead agency proposes to subdivide a 10-acre parcel for the development of two new single family residences. Two pads would be graded totaling 50,707 square feet. Additional earthwork of 27,500 cubic yards of cut and 26,000 cubic yards of fill would also occur. In the Draft MND, the lead agency has not quantified the project's construction air quality impacts and has therefore not demonstrated that the proposed project will not generate significant adverse construction air quality impacts that may affect sensitive receptors located just north of the project site across Hasley Canyon Road and trigger further analysis pursuant to the California Environmental Quality Act.

To calculate the proposed project's emission impacts, the lead agency can utilize the current California Emission Estimator Model (CalEEMod) accessible at http://www.aqmd.gov/ceqa/models.html. CalEEMod is a statewide land use emissions model that can quantify potential project criteria pollutant and greenhouse (GHG) emissions. The lead agency can also estimate project emissions by following the calculation methodologies in Chapter 9 and the Appendix to Chapter 9 in the South Coast AQMD's CEQA Air Quality Handbook. Should the lead agency conclude after its

analyses that construction or operational air quality impacts exceed the SCAQMD daily significance thresholds, staff has compiled mitigation measures to be implemented if the air quality impacts are determined to be significant. Mitigation measure suggestions can be found at http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html

The AQMD also recommends that the lead agency estimate PM2.5 impacts in response to adoption of PM2.5 ambient air quality standards by U.S. EPA and CARB using the following recommended SCAQMD methodology for calculating PM2.5 emissions found at http://www.aqmd.gov/ceqa/handbook/PM2_5/PM2_5.html. Finally, it is recommended that the lead agency evaluate localized air quality impacts to ensure that the nearby residences are not adversely affected by the construction activities that are 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

Please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. The SCAQMD staff would is 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,

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

Attachment

IM:GM

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Control Number