



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Revised Draft Environmental Impact Report (Revised Draft EIR) for the Proposed Hidden Creeks Estates (ENV-2005-6657-EIR) (SCH No.: 2006031049)

The South Coast Air Quality Management District (SCAQMD) staff 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 EIR.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to subdivide 285 acres to create 188 single-family residential lots in the northwestern portion of the San Fernando Valley in Los Angeles County and annex the Proposed Project site into the City of Los Angeles (Proposed Project). The Proposed Project will also preserve 131.5 acres of open space. The Proposed Project is immediately adjacent to and northwest of the Porter Ranch Community. Construction of the Proposed Project would occur over a period of approximately 24 months beginning in 2018 and completed by 2021.

SCAQMD Staff's Summary of Air Quality Analysis

In the Air Quality Section, the Lead Agency quantified the Proposed Project's construction and operational air quality impacts and compared those impacts to SCAQMD's regional and localized air quality CEQA significance thresholds. Based on the analyses, the Lead Agency found that the Proposed Project would result in less than significant air quality impacts during construction and operations, and that no mitigation measures are required.¹ The air quality analysis takes into account the following project design feature (PDF) AQ-1 in the estimate of construction emissions from the Proposed Project.² SCAQMD staff has comments on the PDF-AQ-1. Please see the attachment for more information. The attachment also includes SCAQMD staff's comment on SCAQMD Rule 403(e).

¹ Revised Draft EIR. *IV.B Air Quality*. Page IV. B-35

² *Ibid.* Page IV. B-26

Pursuant to California Public Resources Code Section 21092.5 and CEQA Guidelines Section 15088, SCAQMD staff requests that the Lead Agency provide SCAQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. SCAQMD staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Ryan Bañuelos, Air Quality Specialist, CEQA IGR Section, at (909) 396-3479, if you have any questions regarding the enclosed comments.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment

LS:RB

LAC171109-04

Control Number

ATTACHMENT

Recommended Change to the Existing PDF-AQ-1

1. CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate these impacts. SCAQMD staff recommends that the Lead Agency incorporate the following change to PDF-AQ-1 the Final EIR to further reduce emissions, particularly from ROG and NOx. Additional information on potential mitigation measures as guidance to the Lead Agency are available on the SCAQMD CEQA Air Quality Handbook website at <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

PDF-AQ-1: Off-road diesel-powered construction equipment used during grading and other phases of construction shall meet or exceed the CARB and USEPA Tier 3⁴ off-road emissions standards for equipment rated at 50 horsepower or greater during the grading, concrete pouring and building construction phases of project construction. In the event that construction equipment cannot meet the Tier 4 engine certification, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is approved by the Lead Agency to implement other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, reduction in the number and/or horsepower rating of construction equipment, limiting the number of daily construction haul truck trips to and from the Project, limiting daily construction activities, using cleaner vehicle fuel, and/or limiting the number of individual construction project phases occurring simultaneously. On-road haul trucks used shall meet or exceed the model year 2010 emission standards. A copy of each unit's certified tier specification or model year specification and CARB or SCAQMD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment.

Compliance with SCAQMD Rule 403(e) – Large Operations

2. The Lead Agency included a discussion on compliance with SCAQMD Rule 403- Fugitive Dust in the Draft EIR. Based on the project description, the Proposed Project is a large operation of approximately 285 acres³ (50-acre sites or more of disturbed surface area; or daily earth-moving operations of 3,850 cubic yards or more on three days in any year) in the South Coast Air Basin. The Lead Agency is required to comply with SCAQMD Rule 403(e) – Additional Requirements for Large Operations⁴. The requirements may include, but are not limited to, Large Operation Notification (Form 403 N), appropriate signage, additional dust control measures, and employment of a dust control supervisor that has successfully completed the Dust Control in the South Coast Air Basin training class⁵. Therefore, SCAQMD recommends that the Lead Agency include a discussion to demonstrate compliance with SCAQMD Rule 403(e) in the Final EIR.

³ Revised Draft EIR. *II Project Description*. Page II-1.

⁴ South Coast Air Quality Management District Rule 403. Last amended June 3, 2005. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf>.

⁵ South Coast Air Quality Management District Compliance and Enforcement Staff's contact information for Rule 403(e) Large Operations is (909) 396-2608 or by e-mail at dustcontrol@aqmd.gov.