



South Coast Air Quality Management District

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

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Ms. Niki Cutler, AICP, Principal Planner
Planning Department
City of Rolling Hills Estates
4045 Palos Verdes Drive North
Rolling Hills Estates, CA 90274

Draft Environmental Impact Report (Draft EIR) for the Proposed Chandler Ranch/Rolling Hills Country Club Project

The South Coast Air Quality Management District (AQMD) staff appreciates the opportunity to comment on the above-mentioned Draft EIR. Although the public comment period was from May 1, 2009 to June 30, 2009, AQMD staff was not notified about this project until March, 2010. While the comment period has closed, the Final Environmental Impact Report has not yet been published by the lead agency, and the project consultant team has requested that AQMD staff review the Draft EIR and provide comments. The attached comments are meant as guidance for the lead agency and should be incorporated into the Final Environmental Impact Report. In addition, please ensure that the AQMD is included in the distribution list for any future projects that the lead agency determines are subject to CEQA.

AQMD staff is concerned that the large amount of grading that will occur in close proximity to residents during construction of this project may produce significant air quality impacts. AQMD staff requests the lead agency to consider additional feasible mitigation measures that may reduce the magnitude of this significant impact. In order to provide the public a more complete description of potential air quality impacts, AQMD staff also requests further clarification in the Final EIR to address how both construction emissions and baseline emissions were calculated and how compliance with AQMD rules may impact the project's emissions.

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 – Inter-Governmental Review, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

A handwritten signature in black ink that reads "Ian V. MacMillan".

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

Attachment
IM:JK:GM
LAC100309-06
Control Number

Construction Emissions

1. Construction Acreage

On page 26 in Appendix B of the Draft EIR, the lead agency compares peak day construction emissions assuming a maximum area disturbance of five acres and a 25-meter distance between receptors and construction activities. After accounting for compliance with AQMD rules and various mitigation measures, the lead agency indicates in Table 3.2.11 that particulate matter impacts will remain significant during construction. Given the size of the site (220 acres), it is unclear from the text of the Draft EIR, and in follow-up phone conversations with the project consultants, that a five acre limit on daily construction activities is feasible. As the lead agency determined that air quality construction impacts are significant, AQMD staff requests that the lead agency consider additional measures in the Final EIR to reduce the impact on surrounding residents. This may include considering reduced daily construction activity in close proximity to the edge of the site. Regardless, a more comprehensive description of total disturbed acreage during construction and the resulting potential air quality impacts should be presented in the Final EIR.

2. Particulate Matter Mitigation Measures

Because the lead agency has determined that mitigated construction phase emissions for 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 3.2-38, if applicable and feasible:

Recommended additions:

- Use electricity from power poles rather than temporary diesel or gasoline power generators;
- Provide incentives to the construction contractor to only use off-road equipment that meets that utilizes the most stringent emission controls available. The lead agency is recommended to consider the AQMD “SOON” Program¹ which provides financial incentives to owners of construction equipment in order to upgrade their fleets.
- Restrict operations to “clean trucks,” such as a 2007 or newer model year or 2010 compliant vehicle;
- 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;
- 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;
- Reroute construction trucks away from congested streets or sensitive receptor areas;

¹ <http://www.aqmd.gov/tao/Implementation/SOONProgram.htm>

- All vehicles and equipment will be properly tuned and maintained according to manufacturers' specifications;
 - Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 mph;
 - All trucks hauling dirt, sand, soil, or other loose materials are to be covered;
 - Pave road and road shoulders;
 - Suspend all excavating and grading operations when wind gusts (as instantaneous gusts) exceed 25 mph; 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.
3. On page 3.2-32, the lead agency states that peak day construction activities are assumed to be 150% of average day construction activities. AQMD staff requests that further justification be presented in the Final EIR of how this assumption is an appropriate worst case scenario.

Baseline Emissions

4. Concrete Batch Plant Operations

In Appendix C - Baseline Emissions, the lead agency has estimated project emissions from the Chandler Facility from delivery trucks coming to the landfill. The Chandler Facility also includes concrete batching operations at the sand and gravel mine area. Based on the analysis in Appendix C, the concrete batch plant operation emissions were not estimated or included in the baseline emissions shown in Table 3.2.4 (Project Baseline Mass Daily Emissions) or included in the baseline emissions subtracted from the peak day construction emissions in Table 3.2.8 (Unmitigated Construction Mass Daily Emissions) and Table 3.2.9 (Mitigated Construction Mass Daily Emissions). These concrete batch plant emissions should be estimated and included in the Final EIR as part of the project baseline.

5. On-Road Emissions

In the Air Quality and Climate Change Impact Assessment (AQA) in the Draft EIR, the lead agency estimated regional criteria and climate change air quality operational impacts by subtracting existing emissions from the Rolling Hills Country Club (Country Club) and the Chandler Palos Verdes Sand and Gravel facility (Chandler facility) from the peak daily operating emissions estimated for the proposed project activity (including 114 residences and a new golf course and clubhouse complex). Although activities will cease at the existing gravel facility, new truck trips to acquire materials currently obtained at the Chandler facility may be required from other similar facilities within the South Coast Air Basin to meet existing needs. Therefore, it may be inappropriate to subtract on-road emissions related to the Chandler facility from the estimated project operational emissions. In the Final EIR, the AQMD recommends that only the on-road emissions estimated for the existing Country Club be considered in the baseline emission calculations, unless the reduced demand and

subsequent reduction in truck trips and truck vehicle miles traveled can be demonstrated with implementation of the proposed project.

AQMD Rules

6. Demolition Activities Involving Asbestos Removal

In the project description on page 2.0-22 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.

7. Citing Compliance with Rule 403 as a Mitigation Measure

On page 3.2-38 of the Draft EIR, the lead agency lists fugitive dust mitigation measures AQ-1 and AQ-4 citing compliance with AQMD Rule 403 – Fugitive Dust. The lead agency is reminded that complying with a rule, regulation, law, etc., should not be considered as mitigation if it is required. Instead, the effects of complying with a rule, e.g., Rule 403 should be part of the project description and incorporated into the project-specific impact calculations. Any potential dust control measures that exceed Rule 403 specifications should be disclosed to the public as additional mitigation measures.

8. Large Operations Notification

Based on the project description, the lead agency states that the proposed project will include approximately 3.2 million cubic yards of earthwork during construction disturbing approximately 220 total acres during mass grading. Since it appears that the proposed project falls under the requirements of Rule 403 – Fugitive Dust 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.