



South Coast Air Quality Management District

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E-MAILED: DECEMBER 3, 2010

December 3, 2010

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Draft Environmental Impact Report (Draft EIR) for the Proposed Vista Canyon Project (SCH #2007071039)

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 CEQA document.

In the project description, the lead agency includes proposed construction of a mixed-use development consisting of 1,117 residential units, up to 950,000 square feet of commercial, retail, theater, and hotel uses within four planning areas on a 185 acre site. An additional residential overlay would permit conversion of 250,000 square feet of office floor area to 233 multi-family residential units, resulting in a total mix of 1,350 residential units and 700,000 square feet of commercial floor area. The proposed project would also include up to 1.7 million cubic yards of remedial grading; 590,000 cubic yards or cut; 830,000 cubic yards of fill; and a total project soil import up to 500,000 cubic yards to accommodate development within the site.

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.


Mr. Jeff Hogan, AICP,
Senior Planner

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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 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

IM:GM

LAC101020-06
Control Number

Construction Mitigation Measures

1. Because the lead agency has determined that construction phase emissions for oxides of nitrogen (NO_x), particulate matter (PM₁₀ and PM_{2.5}, fugitive dust), and volatile organic compounds (VOCs) exceed the established significance thresholds, the SCAQMD recommends the following additions to the mitigation measures listed starting on page 4.4-35 to further to reduce NO_x, PM₁₀, PM_{2.5}, and VOC emissions, if applicable and feasible. Additional construction mitigation measure suggestions can also be found at http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html:

Recommended additions:

NO_x

- Prohibit vehicle and engine idling in excess of five minutes and ensure that all off-road equipment is compliant with the California Air Resources Board's (CARB) in-use off-road diesel vehicle regulation and SCAQMD Rule 2449;
- 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;
- 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;
- All vehicles and equipment will be properly tuned and maintained according to manufacturers' specifications.; and
- Consistent with measures that other lead agencies in the region (including Port of Los Angeles and Port of Long Beach) have enacted, require all on-site construction equipment to meet EPA Tier 2 or higher emissions standards according to the following:
 - 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.

For additional measures to reduce off-road construction equipment, refer to the mitigation measure tables located at the following website:
www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html.

PM10/PM2.5

- Install wheel washers where vehicles enter and exit the construction site onto paved roads or wash off trucks or any equipment leaving the site each trip;
- 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;
- Replace ground cover in disturbed areas as quickly as possible;
- 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.

VOC

- Use coatings and solvents with a VOC content lower than required under Rule 1113;
- Construct/build with materials that do not require painting;
- Require the use of pre-painted construction materials. and
- Contractors shall use varying-pressure-low-volume (HPLV) paint applicators or other application techniques with equivalent or higher transfer efficiency.