



# South Coast Air Quality Management District

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## **Draft Supplemental Environmental Impact Report (Draft SEIR) for the Proposed Tesoro del Valle (Phases A, B, and C) (SCH No.: 2016101032)**

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 SEIR.

### SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to construct 820 residential units consisting of the originally approved 122 units for Phase B, 115 units for Phase C, and the already-approved, but not-constructed 475 lots from Phase A on a 393.6-acre portion of 1,274.6 acres (Proposed Project). Construction of the Proposed Project is expected to take place over a six-year period from 2018 to 2024<sup>1</sup>.

### SCAQMD Staff's Air Quality Analysis

The Lead Agency quantified the Proposed Project's construction and operational emissions and compared them to SCAQMD's regional and localized air quality CEQA significance thresholds. After incorporating 1999 Final EIR Air Quality Mitigation Measures (1999 AQ MMP-1 through 1999 AQ MMP-6a and b) and the Proposed Project Specific Mitigation Measures (MM AQ-1 and MM AQ-2)<sup>2</sup>, the Lead Agency found that the Proposed Project's mitigated construction emissions would be less than significant. The Proposed Project Specific Mitigation Measure (MM AQ-1) requires the use of Tier 4 emissions standards for off-road diesel-powered construction equipment with more than 50 horsepower, and MM AQ-2 requires architectural coatings on all proposed structures within the Proposed Project to meet SCAQMD's Super-Complaint VOC standard of less than 10 grams per liter<sup>3</sup>. Additionally, the Lead Agency found that the Proposed Project's operational emissions would not exceed SCAQMD air quality CEQA thresholds of significance for operation<sup>4</sup>. Because construction of the Proposed Project would be segmented into four overlapping phases, it is possible that construction and operational emissions may occur concurrently at the completion of Phase 1 (Phase 1 is expected to create operational emissions in these scenarios)<sup>5</sup>. As such, the Lead Agency quantified the combined construction and operational emissions and compared the combined emissions to SCAQMD's regional air quality CEQA significance thresholds for operation<sup>6</sup>. The combined air quality impacts were found to be less than significant.

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<sup>1</sup> Draft SEIR. Page 5.3-35.

<sup>2</sup> *Ibid.* Page 5.3-30 and 31.

<sup>3</sup> *Ibid.*

<sup>4</sup> *Ibid.* Page 5.3-34.

<sup>5</sup> *Ibid.* Table 5.3-13. Page 5.3-35.

<sup>6</sup> *Ibid.* Page 5.3-34.

General Comments

SCAQMD staff reviewed the Air Quality Analysis in the Draft SEIR and has comments on the combined construction and operational air quality impact analysis and meteorological data. Please see the attachment for more information. The attachment also includes a recommendation to discuss compliance with SCAQMD Rule 403(e) – Additional Requirements for Large Operations.

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), 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 SEIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful or useful to decision makers and to the public who are interested in the Proposed Project.

SCAQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact me at [lsun@aqmd.gov](mailto:lsun@aqmd.gov) if you have any questions regarding the enclosed comments.

Sincerely,



Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment

LS

LAC180306-06

Control Number

## ATTACHMENT

**Air Quality Analysis – Overlapping Construction and Operational Activities**

1. In the Draft SEIR, the Lead Agency estimated the combined construction and operational emissions for the worst-case anticipated active construction phases that is anticipated to be occurring at the completion of Phase 1 (Phase 1 would be creating operational emissions in these scenarios)<sup>7</sup>. The combined emissions were shown in Table 5.3-13, *Combined Construction and Operational Maximum Daily Emissions*, and were compared the SCAQMD air quality CEQA significance thresholds for operation. Based on a review of Table 5.3-13, it does not appear that operational emissions were added to the “unmitigated emissions” or the “mitigated emissions” for the “Combined Phases 2, 3, and 4 Building Construction Phases + Operational” (See Table A below). For example, the total unmitigated ROG emissions of 6.32 pounds per day derived from adding together 2.40 pounds per day from Phase 2 *construction*, 1.98 pounds per day from Phase 3 *construction*, and 1.94 pounds per day from Phase 4 *construction*. No operational emissions. Therefore, it is recommended that the Lead Agency clarify the amount of operational emissions that should be combined with construction emissions due to overlapping construction and operational activities in the Final SEIR. If the combined emissions, after revisions, would exceed SCAQMD air quality CEQA significance thresholds for operation, mitigation measures will be required.

**Table A: Copy of Table 5.3-13 Combined Construction and Operational Maximum Daily Emissions**

Emissions Source	Pollutant (pounds per day) <sup>a</sup>					
	ROG	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM10	PM2.5
Total Operational Emissions	47.73	31.44	209.43	0.54	42.65	12.86
<b>Phase 2 Building Construction</b>						
Unmitigated Emissions	2.40	20.04	22.06	0.05	2.51	1.23
Mitigated Emissions <sup>b</sup>	1.25	7.11	23.36	0.05	1.80	0.57
<b>Phase 3 Building Construction</b>						
Unmitigated Emissions	1.98	17.33	18.56	0.04	1.46	0.94
Mitigated Emissions <sup>b</sup>	0.83	4.40	19.86	0.04	0.75	0.28
<b>Phase 4 Building Construction</b>						
Unmitigated Emissions	1.94	17.12	18.24	0.04	1.37	0.92
Mitigated Emissions <sup>b</sup>	0.79	4.19	19.54	0.04	0.66	0.26
<b>Combined Phases 2, 3, and 4 Building Construction Phases + Operational</b>						
Unmitigated Emissions	6.32	54.49	58.86	0.13	5.34	3.09
Mitigated Emissions <sup>b, c</sup>	2.87	15.70	62.76	0.13	3.21	1.11
SCAQMD Thresholds	55	55	550	150	150	55
Is Threshold Exceeded for Unmitigated?	NO	NO	NO	NO	NO	NO
Is Threshold Exceeded after Mitigation?	NO	NO	NO	NO	NO	NO
ROG = reactive organic gases; NO <sub>x</sub> = nitrogen oxides; CO = carbon monoxide; SO <sub>2</sub> = sulfur dioxide; PM10 = particulate matter; up to 10 microns; PM2.5 = particulate matter less than 2.5 microns.						
<sup>a</sup> Emissions were calculated using the CalEEMod version 16.3.1 Computer Model, as recommended by SCAQMD.						
<sup>b</sup> Includes implementation of Mitigation Measure AQ-1 that requires all diesel equipment utilized during construction that exceeds 50 horsepower to meet Tier 4 emissions standards.						
Source: CalEEMod model (Appendix B)						

<sup>7</sup> *Ibid.* Table 5.3-13. Page 5.3-35.

**Meteorological Data**

2. The Lead Agency used the meteorological data from the SCAQMD's Santa Clarita monitoring site for the Proposed Project's modeling application, and five full years of meteorological data (2008 – 2012) was collected at the Santa Clarita<sup>8</sup>. This dataset has been replaced with a new meteorological dataset (2012 – 2016) for most meteorological stations within the SCAQMD. For projects located in the Santa Clarita area, it is recommended that either the Burbank or the Van Nuys meteorological data station<sup>9</sup> is used for the Proposed Project's modeling analyses, and the Lead Agency should select the most appropriate meteorological data station based on wind rose comparisons. For more information regarding the most recent meteorological dataset for use in dispersion modeling and health risk assessments and to download the datasets, please visit SCAQMD's Meteorological Data webpage at: <http://www.aqmd.gov/home/air-quality/air-quality-data-studies/meteorological-data>.

**Compliance with SCAQMD Rule 403(e)**

3. The Lead Agency included a discussion on general compliance with SCAQMD Rule 403 in the Draft SEIR. Since the Proposed Project is a large operation of approximately 393.6 acres (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 Operations<sup>10</sup>, which includes requirements to provide 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 class<sup>11</sup>. Therefore, SCAQMD recommends that the Lead Agency include a discussion to demonstrate specific compliance with SCAQMD Rule 403(e) in the Final SEIR. Compliance with SCAQMD Rule 403(e) will further reduce particulate matters from the Proposed Project.

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<sup>8</sup> *Ibid.* Page 5.3-23.

<sup>9</sup> South Coast Air Quality Management District. The AERMOD-ready Meteorological Data. Accessed at: <http://www.aqmd.gov/home/air-quality/air-quality-data-studies/meteorological-data/aermod-table-1>.

<sup>10</sup> South Coast Air Quality Management District. Rule 403(e). Page 7. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf>.

<sup>11</sup> 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](mailto:dustcontrol@aqmd.gov).