



South Coast
Air Quality Management District

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

E-MAILED: SEPTEMBER 4, 2009

September 4, 2009

Mr. Aaron O. Allen
U.S. Army Corps of Engineers
Ventura Field Office
2151 Alessandro Drive, Suite 110
Ventura, CA 93001

Mr. Dennis Bedford
California Department of Fish and Game
Newhall Ranch EIS/EIR Project Comments
4949 Viewridge Avenue
San Diego, CA 92123

Dear Mr. Allen and Mr. Bedford,

Draft Environmental Impact Statement/Report (Draft EIS/EIR) for the Proposed Newhall Ranch Resource Management and Development Plan (RMDP) and the Spineflower Conservation Plan (SCP)

The South Coast Air Quality Management District (SCAQMD) 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 Environmental Impact Statement/Report.

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 Statement/Report. The SCAQMD 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 – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

Steve Smith
Program Supervisor – CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS:GM

LAC090428-06
Control Number

Construction Air Quality Analysis

1. The lead agency has determined that construction air quality impacts will exceed the SCAQMD's recommended regional and localized daily significance thresholds for VOC, NOx, CO, PM10 and PM2.5. As a result, the Draft EIS/EIR includes a comprehensive list of measures to mitigate potentially significant adverse air quality impacts. Staff, however, recommends the following modifications to mitigation measure AQ-12:

Recommended change:

AQ-12 Use construction equipment that complies with the requirements and compliance schedule of the adopted CARB Regulation for In-Use Off-Road Diesel Vehicles in effect at the time of use and use only Tier 2 or newer diesel-fueled (or alternative-fueled) construction equipment during all construction activities. Only if Tier 2 or newer equipment is not available can Tier 1 equipment can be used.

Project Length with Construction and Operations Overlapping

2. Tables 4.7-8 through 4.7-12 show estimated direct and indirect construction emissions from the proposed project and project alternatives. Tables 4.7-13 through 4.7-37 show direct and indirect operational emissions from the proposed project and project alternatives. Given the phased nature of the project components (see Table 2.0-1 on page 2.0-58), it appears that construction and operational emissions from the proposed project will overlap in future years. In situations where construction and operation activities overlap, SCAQMD staff recommends that peak daily construction and operation emissions be summed and then compared to the applicable operational significance thresholds to determine significance. Therefore, staff recommends that the lead agency revise the air quality analyses as recommended above in the Final EIS/EIR.

Health Risk Assessment

3. Page 9 of the HRA analysis present the placement of receptors. Receptors were placed 500 meters from emission sources based on the concept that heavy construction activity would not occur near occupied residences in any village. A mitigation measure should be added to the Final EIS/EIR prohibiting construction activities within 500 meters of occupied residences, since concentrations were limited by this assumption.
4. Health risk calculations are presented in a spreadsheet labeled Newhall Ranch EIS/EIR. With the exception of Homestead South, none of the concentrations used to estimate carcinogenic health risk correspond with the highest concentration reported at a receptor in the output files. For non-carcinogenic chronic health risk, four construction years are modeled (2011 through 2015) and the maximum concentration is only used to estimate chronic health risk for 2012 and 2013. The Final HRA and EIS/EIR should identify (by UTM coordinate) the receptors used. The text should also explain why receptors with exposures to higher concentrations were not considered in the estimation of health risk.

Localized Significance Thresholds

5. The localized significance threshold sources were designed and placed similar to the sources treatment in the HRA, which is a single volume source placed near the center of each village or subarea. For the HRA, this source treatment can be used because the emissions are evaluated over an averaging time of one year for 70 years. This type of source treatment is not appropriate for short averaging times (1-hour to 24-hour), which is the basis for LSTs.

The current source treatment (single volume source placed near the center of each village or subarea) underestimates the concentrations at the receptors. The correct source treatment is to place the volume source closest to the nearest downwind receptor, since the areas disturbed by grading and locations of existing and project related receptors should be known or approximated. Depending on the shape of the area disturbed and location of the receptor, an array of volume sources may be more appropriate than a single volume source.

6. Pages 8 through 10 of the LST analysis present the placement of receptors. Receptors were placed 500 meters from emission sources based on the concept that heavy construction activity would not occur near occupied residences in any village. As noted in comment #4, a mitigation measure should be added to the Final EIS/EIR prohibiting construction activities within 500 meters of occupied residences, since concentrations were limited by this assumption.
7. The emission rate for diesel PM10 exhaust for the Portrero Valley Village is presented as 0.383 gram per second. However, based on the 4.72 pounds per hour diesel PM10 emission rate in Table 3 of the LST Analysis, the emission rate should be 0.594 gram per second $((4.72 \text{ pound per hour} \times 453.59 \text{ grams per pound}) / (3,600 \text{ seconds per hour}))$. Other PM10 emission rates were not verified. The emission rates should be verified and corrected for the Final EIS/EIR and HRA.
8. The peak concentrations reported in the ISCST3 output files are not used to estimate the NO2 concentrations from the proposed project. The Final EIS/EIR and HRA should identify the receptor with the highest concentration by UTM coordinate. The text should also explain why higher concentrations reported at other receptors were not used.
9. The peak 8-hour CO concentration is reported as 247 micrograms per meter cubed, which matches the highest 8-hour CO concentration reported for 2013. The highest 8-hour CO concentration reported in the output files is 336 micrograms per meter cubed for 2010. The Final EIS/EIR and HRA should correct or explain this difference.