



South Coast Air Quality Management District

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E-MAILED: MARCH 22, 2012

March 22, 2012

Mr. Scott Wolfe, AICP, Scott@wlv.org
Planning Director
City of Westlake Village
31200 Oak Crest Drive
Westlake Village, CA 91361

Draft Environmental Impact Report (Draft EIR) **for Proposed Shoppes at Westlake Project**

The South Coast Air Quality Management District (AQMD) 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 CEQA document.

In the project description, the lead agency proposes the construction and operation of an approximate 243,561 square foot retail commercial shopping center on a 21.5 acre site. The proposed project would also include approximately 16,000 cubic yards of on-site cut and 197,000 cubic yards of fill with approximately 181,000 cubic yards of soil import. Construction activities are estimated to last about one year and be completed around July 2013.

The lead agency has estimated in the Draft EIR that localized construction air quality impacts will exceed the AQMD daily significance thresholds for PM10 and PM2.5. In addition, project operational air quality impacts are estimated to exceed regional thresholds of significance. The AQMD staff is concerned that all feasible mitigation measures be considered by the lead agency and has included additional mitigation measures for consideration in the attachment. These measures are designed to further minimize adverse air quality impacts to sensitive receptors (residences) located just east the proposed project and regional emissions overall.

Pursuant to Public Resources Code Section 21092.5, please provide the AQMD staff 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.

Mr. Scott Wolfe, AICP
Planning Director

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March 22, 2012

Sincerely,

A handwritten signature in black ink that reads "Ian V. MacMillan". The signature is written in a cursive, slightly slanted style.

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

IM:GM
Attachment

LAC120207-03
Control Number

Construction Mitigation Measures

1. In the Draft EIR, the lead agency has determined that project localized construction impacts exceed the SCAQMD recommended significance threshold for PM10 and PM2.5. The AQMD staff therefore recommends the following additional mitigation measures during the projected 12 month construction period in addition to the measures proposed starting on page 4.2-11 to further reduce PM10 and PM2.5 impacts, if applicable and feasible.

Recommended Additions:

- ✓ Limit the amounts of daily soil disturbance to the amounts analyzed in the Draft EIR.
- ✓ Install wheel washers where vehicles enter and exit the construction site onto paved roads or wash off trucks and any equipment leaving the site each trip.
- ✓ Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more).
- ✓ 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.
- ✓ Sweep streets at the end of the day if visible soil is carried onto adjacent public paved roads (recommend water sweepers with reclaimed water).
- ✓ Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation.

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 .

Operational Mitigation Measures

2. Based on the lead agency's CalEEMod modeling, mitigated regional operational air impacts are estimated to exceed the recommended daily significance thresholds for ROG, NOx, and CO. In addition to the mitigation measure proposed by the lead agency on page 4.2-13, the AQMD staff recommends that the lead also consider the following mitigation measures, if feasible.
 - Provide electrical vehicle charging infrastructure for electric vehicles; and
 - Due to the large roof area associated with this project, consider installing solar roof panels to reduce emissions from fossil fuel based electrical generating technologies providing electrical power to the project site.