



# South Coast Air Quality Management District

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## **Draft Mitigated Negative Declaration (Draft MND) for the Proposed Chatsworth Park South Remedial Action Plan Project**

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 Mitigated Negative Declaration.

In the project description, the lead agency proposes various construction activities including creation of a surface cap that would cover soil impacted by lead and polycyclic aromatic hydrocarbons (PAHs) in the area of a former Small Arms Firing Range. In addition, the proposed project would include rough grading and excavation, installation of a drainage system, grubbing and removal of non-protected non-heritage trees, removal and off-site disposal of contaminated soils and wastes, and other activities.

Based on the potential hazardous waste emissions during the proposed soil disturbance, the lead agency should cite compliance with SCAQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil in the Final MND. Compliance with SCAQMD Rule 403 – Fugitive Dust should also be included in the final CEQA document due to the potential for fugitive dust emissions from the soil disturbance shown in the project description.

In addition, the lead agency has estimated on-site emissions using the CalEEMod land use computer model and has determined that NO<sub>x</sub> and CO emission estimates are less than significant when compared with the SCAQMD recommended localized significance thresholds.<sup>1</sup> Although localized NO<sub>x</sub> and CO emissions were estimated, PM<sub>10</sub> and PM<sub>2.5</sub> on-site impacts were not compared with applicable localized thresholds of significance. Rather, in reference to the SCAQMD localized significance thresholds, the lead agency incorrectly states on page 3-9 that “These thresholds are not used for PM<sub>10</sub> and PM<sub>2.5</sub>.” Instead, the CalEEMod modeled PM<sub>10</sub> and PM<sub>2.5</sub> on-site impacts were compared with a different standard: the OSHA thresholds for lead dust exposure. Since

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<sup>1</sup> Localized Significance Thresholds can be located at the following SCAQMD website link:  
<http://www.aqmd.gov/ceqa/handbook/LST/LST.html>

SCAQMD localized significance thresholds include PM10 and PM2.5 emission thresholds, localized project PM10 and PM2.5 impacts should be compared with each emission's applicable significant threshold for consistency. The SCAQMD thresholds should also be used because the SCAQMD localized and the OSHA thresholds are two entirely different standards that measure different types of impacts. Further, the footnotes to Table III-B (Summary of Localized Significance of Construction Emissions) on page 3-10 state that the lead agency assumed five acres of daily soil disturbance for the SCAQMD NOx and CO localized thresholds. Since this amount of activity was assumed in determining project impacts, the lead agency should also limit soil disturbance activities in the Final MND to the activities specified in the air quality analysis, i.e., soil disturbance activities should be limited to five acres or less per day. Finally, should the analysis for localized construction impacts indicate that localized impacts for PM10 and PM2.5 would result in significant air quality impacts, the lead agency should then revise the mitigation measures on page 3-10 using language that clearly identifies mitigation measures<sup>2</sup> that will help reduce potentially significant impacts from project construction emission sources. The current language for the proposed measures on page 3-10 defers the mitigation. Each measure, if required, should be revised in the Final MND and written in sufficient detail for clarity and enforcement purposes.

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. The SCAQMD staff would be 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

Attachment

IM:GM

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<sup>2</sup> Mitigation measure suggestions can be found at  
[http://www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html)