



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

April 4, 2018

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Mitigated Negative Declaration (MND) for the Proposed West Bastanchury Residential Subdivision Project

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 MND.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to subdivide 13 acres for future development of 23 residential units (Proposed Project). Based on Figure 3, *Aerial Photograph*, in the MND, the Proposed Project is surrounded by residential uses to the east, south, and west¹. Construction is expected to take approximately 24 months to complete².

SCAQMD Staff's Comments – Level 3 Diesel Particulate Filters

CEQA requires that all feasible mitigation measures go beyond what is required by law to minimize any significant impacts. To further reduce particulate matter emissions during construction and minimize their impacts on nearby residents, SCAQMD staff recommends that the Lead Agency use construction equipment fitted with CARB verified Level 3 Diesel Particulate Filters (DPF) for off-road diesel-powered construction equipment of 50 horsepower or more that are utilized during grading or site preparation operations. Level 3 DPFs are capable of achieving at least 85 percent reduction in particulate matter emissions³. A list of CARB verified DPFs are available on the CARB website⁴. Additional information on potential mitigation measures as guidance to the Lead Agency is available on the SCAQMD CEQA Air Quality Handbook website⁵.

Conclusion

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. Please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final MND. When responding to issues raised in the comments, response should provide sufficient details 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 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.

¹ MND. Page 7.

² MND. Page 32.

³ California Air Resources Board. November 16-17, 2004. *Diesel Off-Road Equipment Measure – Workshop*. Page 17. Accessed at: https://www.arb.ca.gov/msprog/ordiesel/presentations/nov16-04_workshop.pdf.

⁴ *Ibid*. Page 18.

⁵ South Coast Air Quality Management District. <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

David Brantley

April 4, 2018

SCAQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact me at lsun@aqmd.gov if you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

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