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September 8, 2017

David J. R. Mack
Resource Management Agency--Planning
1441 Schilling Place, South 2nd Floor
Salinas, CA 93901

Email: CEQAcomments@co.monterey.ca.us

Subject: Comments on Mitigated Negative Declaration for Porter Estates Company Bradley Ranch Inc.

Dear Mr. Mack,

Thank you for providing the Monterey Bay Air Resources District (Air District) the opportunity to comment on the above-referenced document. The Air District has reviewed the document and has the following comments:

Air Quality:

I. Discussion/Conclusion/Mitigation:

- a. As correctly stated, the updated AQMP was adopted in 2017. Please refer to the AQMP as the 2012-2015 AQMP instead of the 2016 AQMP. This will eliminate confusion. 1.1
- b. Please make sure to consult the Air District Compliance Division on the matter of portable engines. Per *Rule 201, Section 4.14.1 (10/15/2014)* any stationary IC engine greater than 50 HP must be registered. For Engine-Generator sets, the engine will have a different rating, normally higher than the rating of the generator output. 1.2
- c. In order to minimize off-site drift of fugitive dust and maintain compliance with Air District Rule 400 (Visible Emissions) and 402 (Nuisance), efforts should be made to mitigate off-site emissions using the following Best Management Practices. Please consult these BMPs where appropriate: 1.3
 - Prohibit all grading activities during periods of high wind (over 15 mph)
 - Water all active construction areas at least twice daily. Frequency should be based on the type of operation, soil, and wind exposure.
 - Apply chemical soil stabilizers on inactive construction areas (disturbed lands within construction projects that are unused for at least four consecutive days)
 - Apply non-toxic binders (e.g., latex acrylic copolymer) to exposed areas after cut and fill operations, or hydro-seed area.
 - Maintain at least 2'0" of freeboard in haul trucks.
 - Cover all trucks hauling dirt, sand, or loose materials.
 - Plant vegetative ground cover in disturbed areas as soon as possible.
 - Cover inactive storage piles.
 - Install wheel washers at the entrance to construction sites for all exiting trucks.

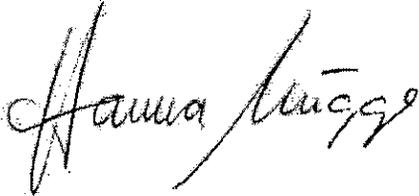
- Post a publicly visible sign which specifies the telephone number and person to contact regarding dust complaints. This person shall respond to complaints and take corrective action within 48 hours. The phone number of the Air District shall be visible to ensure compliance with Rule 402 (Nuisance).

1.3

cont'd

Please let me know if you have any questions. I can be reached at (831) 718-8021 or hmuegge@mbard.org.

Best Regards,



Hanna Muegge
Air Quality Planner

cc: David Frisbey
Alan Romero