



South Coast
Air Quality Management District

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E-mailed: June 4, 2010
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Mr. Randal Lawson
Executive Vice-President
Santa Monica College
Santa Monica, CA 90405

**Review of the Draft Environmental Impact Report (Draft EIR) for
the Santa Monica College Facilities Master Plan 2010 Update**

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are intended to provide guidance to the lead agency and should be incorporated into the revised Draft or Final Environmental Impact Report (Draft or Final EIR) as appropriate.

AQMD staff is concerned that the lead agency failed to quantify localized air quality impacts from oxides of nitrogen (NO_x) and particulate matter (PM₁₀ and PM_{2.5}) emissions during project construction and operation. Without quantifying localized air quality impacts from these pollutants the lead agency is unable to support its conclusion for localized air quality impacts. Therefore, AQMD staff requests that the lead agency quantify potentially significant localized construction and operational air quality impacts from NO_x, PM₁₀ and PM_{2.5} emissions and revise the CEQA document as appropriate. Further, AQMD staff recommends that in the event that the revised CEQA document demonstrates new significant adverse air quality impacts the lead agency require mitigation pursuant to CEQA Guidelines §15370, which could minimize or eliminate potential air quality impacts. Staff is available to work with the lead agency to address these issues and any other questions that may arise.

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 EIR. Further, staff is available to work with the lead agency to address these issues and any

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other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,



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

Attachment

[IM:DG](#)

LAC100422-02
Control Number

AIR QUALITY ANALYSIS

Localized Significance Threshold

1. In addition to analyzing regional air quality impacts the AQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). A localized analysis provides information on potential impacts to surrounding neighborhoods that a regional analysis may not reveal. While the lead agency analyzed the project's localized Carbon Monoxide (CO) impacts, potential localized air quality impacts from NO_x, PM₁₀ and PM_{2.5} were not evaluated. A CO analysis alone is insufficient for evaluating localized air quality impacts, therefore, the AQMD staff requests that the lead agency quantify localized impacts by either using the LSTs developed by the AQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/ceqa/handbook/LST/LST.htm>.

AIR QUALITY MITIGATION

Regional and Localized Mitigation Measures

2. In the event that the lead agency's Revised Draft EIR or Final EIR demonstrates that any criteria pollutant emissions from the localized construction emissions analysis requested in comment #1 create significant adverse impacts, AQMD staff recommends that the lead agency require mitigation pursuant to CEQA Guidelines §15370, which could minimize or eliminate significant adverse air quality impacts. To assist the lead agency with identifying possible mitigation measures for the project, please refer to Chapter 11 of the AQMD CEQA Air Quality Handbook for sample air quality mitigation measures. A list of mitigation measures can be found on the AQMD's CEQA webpage at the following internet address: www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.htm

Additionally, AQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook contain numerous measures for controlling construction-related emissions that should be considered for use as CEQA mitigation if not otherwise required.