



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182  
(909) 396-2000 • [www.aqmd.gov](http://www.aqmd.gov)

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Mr. John F. Signo, AICP, Senior Planner [jsigno@carson.ca.us](mailto:jsigno@carson.ca.us)  
Planning Division  
Carson City Hall  
701 East Carson Street  
Carson, CA 90745

## **Draft Mitigated Negative Declaration (Draft MND) for the Proposed CityView Project (616 E. Carson Street)**

The South Coast Air Quality Management District (AQMD) 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 two alternatives that include construction of a mixed-use development, including up to 156 residential uses and up to 14,350 square feet of commercial uses on approximately 9.63 total acres. In the Air Quality Section, the lead agency quantified the project's *regional* construction and operation air quality impacts and has compared those impacts with the AQMD's recommended regional daily significance thresholds.

In addition to evaluating the above-mentioned air quality impacts, the AQMD recommends that the lead agency estimate *localized* air quality impacts to ensure that any nearby sensitive receptors are not adversely affected by the construction activities that are occurring in close proximity. It is noted on page six under surrounding land uses and in an aerial map inspection that the proposed project is surrounded by sensitive receptors (residential properties) north, south, and west of the proposed project. AQMD guidance for performing a localized air quality analysis can be found on the AQMD web page.<sup>1</sup> Should the lead agency conclude after its analyses that construction or operational localized air quality impacts exceed the AQMD daily significance thresholds, staff has compiled mitigation measures that can be implemented if the air quality impacts are determined to be significant.<sup>2</sup> AQMD staff notes that Rule 403 was not evaluated in the Draft MND, nor were any other mitigation measures. However, a limitation of 2.4 acres of disturbance per day was included in the analysis. If a limitation in daily soil disturbance is included in the analysis in the Final MND, AQMD staff recommends that it be included as a mitigation measure.

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<sup>1</sup> <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>

<sup>2</sup> [http://www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html)

Mr. John F. Signo, AICP  
Senior Planner

2

November 30, 2010

Please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. 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.

Sincerely,



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

IM:GM

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