



# South Coast Air Quality Management District

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July 26, 2011

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## **Review of the Draft Negative Declaration for the Development of 6271 and 6277 Zuma Mesa Drive**

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 Final Negative Declaration (ND) as appropriate.

AQMD staff is concerned that the lead agency did not provide a quantitative determination of the potential localized or regional air quality impacts from construction activities. The AQMD has established a simplified Localized Significance Threshold (LST) methodology to assist lead agencies in determining local air quality impacts.<sup>1</sup> Although the LST methodology is voluntary, CEQA Guidelines §15074 requires that a lead agency use “substantial evidence” to determine the potential significance of a project. Prior to finalizing the project, AQMD staff therefore recommends that the lead agency present the localized impacts from construction and operation of the proposed project. Should significant emissions be identified, mitigation measures should be specified that would reduce this impact to a less than significant level.

AQMD staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Ian MacMillan, Program Supervisor CEQA Section, at (909) 396-3244, if you have any questions regarding these comments.

Sincerely,

A handwritten signature in black ink that reads "Ian V. MacMillan".

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

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