



South Coast Air Quality Management District

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Revised and Recirculated Initial Study/Draft Mitigated Negative Declaration (Recirculated DMND) for the Proposed Tentative Tract Map No. 16959

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 CEQA document.

On October 16, 2009, the AQMD commented on the previous Draft Mitigated Negative Declaration (see attached letter) recommending that the lead agency estimate localized significance impacts for construction activities because sensitive receptors (residences) were located surrounding the proposed site. In the Recirculated DMND, the lead agency again referenced using the AQMD screening tables¹ to determine the project's localized significance thresholds (LSTs) for construction and operations but basic documentation (i.e., the LST thresholds used by the lead agency, the LST emission estimates, and the URBEMIS2007 computer land use model output sheets, etc.) was not included in the Recirculated DMND. Without this documentation, the lead agency has not demonstrated that localized construction impacts are less than significant.

Upon request, the lead agency provided a summary report of the URBEMIS2007 output sheets but the other parts of the analysis were not included. AQMD staff was therefore unable to verify that localized impacts were less than significant based on the documentation submitted. Based on its review of the URBEMIS output sheets later submitted by the lead agency, however, the project's construction localized impacts seem to exceed thresholds based on the project description. The AQMD staff therefore recommends that all of the aforementioned documentation be included in the Final CEQA document. If the lead agency determines that localized impacts are significant, AQMD staff has compiled mitigation measures in addition to those measures listed starting on page 26 of the draft CEQA document that can be implemented if the air quality impacts are determined to be significant.² Pursuant to CEQA Guidelines §15074, the lead agency must demonstrate that the proposed mitigation would reduce impacts to a less than significant level.

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

² http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html

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Please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final CEQA document. The AQMD staff is available to work with the Lead Agency to address these issues and any other 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

Attachment

IM:GM

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