



South Coast Air Quality Management District

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Review of the Draft Mitigated Negative Declaration (Draft MND) for the Proposed John Wayne Airport New Jet Fuel Pipeline and Tank Farm Project

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document both as a commenting agency and as a responsible agency. The following comments are meant as guidance for the Lead Agency and should be incorporated into the final environmental document as appropriate.

The SCAQMD staff is concerned that the above mentioned Draft Mitigated Negative Declaration (Draft MND) prepared by the Lead Agency does not adequately demonstrate that the project will have less than significant operational air quality impacts. Specifically, the Draft MND does not contain a quantitative air quality analysis for the project's operational emissions. For example, the Draft MND does not quantify potential emissions from future fugitive losses or maintenance activities associated with operation of the proposed pipeline extension and tank farm. Also, the final CEQA Document should calculate the difference between the existing operations and future operations. Absent a quantitative air quality analysis, the Draft MND does not substantiate the Lead Agency's determination that the project will result in less than significant operational air quality impacts.

Further, given that the proposed project will require SCAQMD permits it is imperative that the CEQA document analyze air quality impacts consistent with the methodology for the SCAQMD's Operational CEQA Significance Threshold.¹ Therefore, the SCAQMD staff recommends that the Lead Agency revise the Draft MND to incorporate a quantitative operational air quality analysis that substantiates the Lead Agency's significance determination. In the event that the revised air quality analysis demonstrates that the project will result in significant air quality impacts SCAQMD staff recommends

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

that the Lead Agency include air quality mitigation measures pursuant to Section 15126.4 of the CEQA guidelines.

The SCAQMD staff requests that the Lead Agency provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the final environmental document. Also, staff is available to work with the Lead Agency to address these issues and any 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
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IM:DG

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