



South Coast Air Quality Management District

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E-mailed: July 3, 2014
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Review of the Draft Mitigated Negative Declaration (MND) for NG-14-178-PL (ENV 2013-3835) Project

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comment is intended to provide guidance to the lead agency and should be incorporated into the final CEQA document as appropriate.

Based on page 43 of the Draft MND the proposed project will require excavation and export of 20,000 cubic yards of soil from the project site that is surrounded by sensitive land uses¹ (i.e., residential uses). However, the Draft MND did not evaluate the potential localized or regional air quality impacts from soil excavation and export required during the construction phase of the proposed project. As a result, the lead agency has not demonstrated that the project will result in less than significant air quality impacts during construction. Therefore, the SCAQMD staff recommends that the lead agency revise the air quality analysis to include an assessment of potential regional and localized air quality impacts during construction of the proposed project. These potential air quality impacts should be assessed using SCAQMD's Regional and Localized Significance Methodology and compared to the appropriate significance thresholds². Further, the lead agency should ensure that all future projects include a regional and localized air quality analysis if warranted. In the event that the lead agency determines the proposed project will result in significant construction-related air quality impacts the SCAQMD staff recommends that the lead agency require mitigation to minimize these impacts to a less than significant level. Additional construction-related air quality mitigation measures are available at: http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html

¹ California Air Resources Board. April 2005. "Air Quality and Land Use Handbook: A Community Health Perspective." Accessed at: <http://www.arb.ca.gov/ch/landuse.htm>

² The Regional and Localized Construction Significance Thresholds and Methodologies are available at : <http://www.aqmd.gov/ceqa/hdbk.html>

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Please provide the SCAQMD staff with written responses to all comments contained herein prior to the adoption of the final CEQA document. Further, staff is available to work with the lead agency to address these issues and any other questions regarding air quality that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding these comments.

Sincerely,



Ed Eckerle
Program Supervisor
Planning, Rule Development & Area Sources

[EE:DG](#)

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