



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Negative Declaration (ND) for the Proposed Tentative Tract Map 17847

The South Coast Air Quality Management District (SCAQMD) staff 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.

SCAQMD Staff's Summary of Project Description

The lead agency proposes to subdivide 7.44 acres into six lots and construct six residential units (proposed project). The project is located at 6146 East Santiago Canyon Road in the City of Orange, adjacent to an elementary school and within 800 feet or less of other sensitive receptors.¹

SCAQMD Staff's Summary of Air Quality Analysis

The lead agency determined that the proposed project would have less than significant impacts to regional air quality.² However, the lead agency did not adequately analyze the proposed project's localized impacts to air quality during construction. Please see SCAQMD staff's detail comment below.

SCAQMD Staff's Comments

Sensitive receptors are defined as areas with occupants who are especially vulnerable to health impacts associated with air pollution and other environmental contaminants, and include schools and residential units. Although temporary and short-term, on-site construction activities may result in localized air quality impacts to nearby sensitive receptors.³ Therefore, SCAQMD staff recommends that lead agency utilize the Localized Significance Threshold Methodology developed by the SCAQMD to analyze localized air quality impacts to nearby sensitive receptors.⁴ The results of the analysis should be included in the final CEQA document. If significant impacts are identified, mitigation will be required pursuant to the CEQA Guidelines.⁵

Compliance with SCAQMD Rules

Due to earth moving activities that will occur during construction of the proposed project, SCAQMD Rule 403 – Fugitive Dust is applicable.⁶ A discussion of compliance should be incorporated into the final CEQA document.

¹ MND, Page 11.

² *Ibid.* Pages 9-11.

³ Earth moving activities and heavy duty off-road equipment can result in emissions of criteria pollutants at unhealthy levels.

⁴ South Coast Air Quality Management District. Accessed at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>

⁵ CEQA Guidelines Section 15070 (b).

⁶ South Coast Air Quality Management District. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf>

Conclusion

Pursuant to CEQA Guidelines Section 15074, prior to approving the proposed project, the lead agency shall consider the MND for adoption together with any comments received during the public review process. Please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the final CEQA document. When responding to issues raised in the comments, the response should provide sufficient details giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful or useful to decision makers and to the public who are interested in the proposed project.

SCAQMD staff is available to work with the lead agency to address any air quality questions that may arise from this comment letter. Please contact Alina Mullins, Assistant Air Quality Specialist, at amullins@aqmd.gov or (909) 396-2402, should you have any questions.

Sincerely,

Daniel Garcia

Daniel Garcia

Program Supervisor

Planning, Rule Development & Area Sources

DG/AM

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