



South Coast Air Quality Management District

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E-mailed: August 17, 2010
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Review of the Recirculated Mitigated Negative Declaration (MND) for the Emerald Bay Safety Improvement Project

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. AQMD staff previously commented on this project (see attached letter) and incorporates those comments that have not yet been addressed by reference. The following comments are intended to provide guidance to the lead agency and should be incorporated into the final environmental document as appropriate.

Localized Air Quality Impacts

Based on a review of the recirculated MND the AQMD staff is concerned about potential localized air quality impacts to the sensitive receptors (i.e., residences) that surround the project site. Specifically, Exhibit 11 in the recirculated MND indicates that single family residences are located directly east and south of the project site. Therefore, the AQMD staff recommends that the lead agency calculate localized air quality impacts and compare the results to localized significance thresholds (LSTs).

Guidance for Performing a Localized Air Quality Analysis

LSTs should be used in addition to the recommended regional significance thresholds to determine air quality impacts in the immediate vicinity. Therefore, when revising the air quality analysis for the proposed project, it is recommended that the lead agency perform a localized significance analysis by either using the LSTs developed by the AQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/ceqa/handbook/LST/LST.htm>.

In the event that the lead agency finds any significant localized air quality impacts from the proposed project the AQMD staff recommends that the lead agency consider all feasible mitigation measures to reduce construction air quality impacts.

Contact Information

AQMD 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 these comments.

Sincerely,



Ian MacMillan

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

Attachment

[IM:DG](#)

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