



South Coast
Air Quality Management District

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Planning Manager
City of Upland Community Development Department
460 North Euclid Avenue
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**Review of the Mitigated Negative Declaration (MND)
for the Fourteenth Street Water Quality/Drainage Regional Facility**

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

Based on a review of the draft MND the AQMD staff is concerned about potential localized air quality impacts to the sensitive receptors (i.e., residences) that are directly east of the project site. To address this concern, the AQMD staff recommends that the lead agency revise the draft MND to include an analysis of localized air quality impacts from the proposed project. Specific guidance for quantifying potential localized air quality impacts from the proposed project are referenced in the attached comments.

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 the enclosed comments.

Sincerely,



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

Attachment

[IM:DG](#)

SBC100727-05
Control Number

Localized Air Quality Impacts

1. In Chapter Two (Project Description) of the draft MND the lead agency indicates that sensitive receptors (i.e., residences) are located directly east of the proposed project site. Based on Figure 4 in the draft MND the project site is approximately one hundred feet west of an existing residential development; as a result, AQMD staff is concerned about potential localized air quality impacts to these residences. Therefore, the AQMD staff recommends that the lead agency calculate localized air quality impacts and compare the results to localized significance thresholds (LSTs).

Specifically, 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.