



South Coast Air Quality Management District

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E-mailed: July 9, 2010
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Review of the Mitigated Negative Declaration (MND) for the Rhine Channel Contaminated Sediment Cleanup Project

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 California Environmental Quality Act (CEQA) document as appropriate.

Based on the air quality analysis in Appendix A of the MND the proposed project would have significant regional air quality impacts without mitigation, therefore, the effectiveness of each air quality mitigation measure is crucial. Specifically, the lead agency relies on mitigation measures AQ-2 through AQ-11 in the MND to reduce the project's air quality impacts to a less than significant level. These measures require the purchase and use of Mobile Source Emissions Reduction Credits (MSERCs). Therefore, to ensure less than significant air quality impacts from the proposed project AQMD staff recommends that the lead agency clarify AQ-2 to include, "All emission credits used to mitigate significant air quality impacts from the construction of the proposed project shall be consistent with the AQMD's CEQA policies and procedures document titled: Revised CEQA Policy and Procedures in Allowing the Use of Emissions Credits to Mitigate Significant Air Quality Impacts from Construction."

Mr. Chris Miller
Harbor Resources Manager

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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](#)

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