



South Coast Air Quality Management District

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FAXED: JANUARY 20, 2006

January 20, 2006

Mr. Scott Reekstin
City of Tustin
Community Development Department
300 Centennial Way
Tustin, CA 92780

Mitigated Negative Declaration (MND) for The Rawlings Reservoir Replacement Project, Tustin

Dear Mr. Reekstin:

The South Coast Air Quality Management District (SCAQMD) 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 in the Final Mitigated Negative Declaration.

Please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Mitigated Negative Declaration. The SCAQMD would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Charles Blankson, Ph.D., Air Quality Specialist – CEQA Section, at (909) 396-3304 if you have any questions regarding these comments.

Sincerely

Steve Smith, Ph.D.
Program Supervisor, CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS: CB

ORC051222-02
Control Number

**Mitigated Negative Declaration (MND) for The Rawlings Reservoir
Replacement Project**

1. **Demolition Emissions & SCAQMD Rule 1403:** On page 3-1 the lead agency states that asbestos-containing materials have been identified in the existing reservoir materials. The lead agency also states that asbestos-containing materials will be removed and disposed of in accordance with applicable procedures established by state and local agencies. The lead agency should be aware that the proposed demolition activities would be subject to SCAQMD Rule 1403 – Asbestos Emissions From Demolition/Renovation Activities. This rule regulates asbestos emissions from building demolition. Given that the proposed project site is surrounded by residences and Foothill High School, both considered sensitive receptors, it is important that the project proponent also comply with SCAQMD Rule 1403. A copy of the rule is attached for convenience.

2. **Short-Term Localized Impacts:** Table 3 on page 5-7 of the MND shows construction PM10 emissions exceeding the regional mass daily significance threshold, pre-mitigation. The proposed project has the potential to also raise localized ambient concentrations. Consistent with the SCAQMD's environmental justice program and policies, the SCAQMD recommends that lead agency also evaluate localized air quality impacts. Since the proposed project is less than five acres in area, it may be possible that the lead agency could use the localized significance threshold (LST) tables and not perform dispersion modeling. Given the proximity of the proposed project to the above-mentioned sensitive receptors, SCAQMD staff recommends that the lead agency undertake the localized analysis to ensure that all necessary and feasible mitigation measures are implemented should the analysis demonstrate that construction NO_x and CO emissions are significant. The methodology for conducting the localized significance thresholds analysis can be found on the SCAQMD website at:
www.aqmd.gov/ceqa/handbook/LST/LST.html.