



South Coast
Air Quality Management District

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E-Mailed: November 10, 2010
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Mr. David Attaway
Environmental Supervisor
City of Los Angeles
Department of Recreation and Parks
221 N. Figueroa Street, Suite 100
Los Angeles, CA 90012

**Review of the draft Mitigated Negative Declaration (MND) for the
Chatsworth Reservoir Wetland and Riparian Mitigation Program**

The South Coast Air Quality Management District (AQMD) 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 revised or final CEQA document as appropriate.

The AQMD staff is concerned that the lead agency has not demonstrated that the proposed project will have less than significant air quality impacts absent a localized air quality analysis and greenhouse gas (GHG) emissions analysis for the project. Without quantifying localized air quality impacts and GHG emissions impacts the lead agency is unable to support its conclusion that the project will have less than significant air quality impacts. Therefore, AQMD staff requests that the lead agency revise the CEQA document to include a localized air quality analysis and GHG emissions analysis. In the event that the lead agency's revised CEQA document demonstrates significant adverse air quality impacts the AQMD staff recommends that the lead agency require mitigation pursuant to Section 15370 of the CEQA Guidelines.

AQMD staff is available to work with the lead agency to address these air quality 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,

A handwritten signature in black ink that reads "Ian V. MacMillan". The signature is written in a cursive, slightly slanted style.

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

Attachment

[IM:DG](#)

LAC101019-05
Control Number

Localized Construction Emission Impacts

1. The proposed project site is surrounded by a residential community (i.e., sensitive land use), therefore, AQMD staff recommends that in addition the regional air quality impacts analyzed in attachment E of the MND the lead agency calculate localized air quality impacts. The results from the localized air quality analysis should then be compared the localized significance thresholds (LSTs). The LSTs can be used in addition to the recommended regional significance thresholds to indicate whether ambient air quality standards are exceeded locally when preparing a CEQA document. The AQMD staff recommends that the lead agency quantify localized impacts by either performing dispersion modeling or using the LSTs developed by the AQMD and restricting the footprint of construction activity to five acres or less per day. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/ceqa/handbook/LST/LST.htm>.

Quantification of Regional and Localized PM2.5 Emissions

2. As part of the analysis recommended in comment #1 above, AQMD staff also recommends analyzing localized PM2.5 emissions impacts from the proposed project and comparing them to the LSTs for PM2.5. Guidance for calculating PM2.5 emissions and PM2.5 significance thresholds can be found at the following internet address: http://www.aqmd.gov/ceqa/handbook/PM2_5/PM2_5.htm.

Quantification of Greenhouse Gas (GHG) Emissions

3. The AQMD staff is concerned that the lead agency has failed to calculate GHG emissions impacts from the proposed project. AQMD staff would like to remind the lead agency that Section 15064.4 of the CEQA guidelines requires that the lead agency “make a good faith effort” to quantify the GHG emissions impacts from the proposed project. Further, AQMD staff would like to note that based on the technical information provided in attachment E of the MND the lead agency has adequate technical information (e.g., type of construction equipment, hours of equipment operation, material delivery trips and energy consumption) to calculate the GHG emissions impacts from the proposed project. Therefore, AQMD staff requests that the lead agency revise the CEQA document include a quantitative analysis of greenhouse gases, a determination of significance, and, if necessary, feasible mitigation measures.

Air Quality Mitigation Measures

4. In the event that the lead agency’s revised CEQA document requested in comments #1 and #2 demonstrates significant adverse air quality impacts the AQMD staff recommends that the lead agency require mitigation pursuant to Section 15370 of the CEQA Guidelines that could minimize or eliminate significant air quality impacts. To assist the lead agency with identifying possible mitigation measures for the project, please refer to Chapter 11 of the AQMD CEQA Air Quality Handbook for sample air quality mitigation measures. Also, a list of mitigation measures can be

found on the AQMD's CEQA webpage at the following internet address:

www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.htm

Additionally, AQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook contain numerous measures for controlling construction-related emissions that should be considered for use as CEQA mitigation if not otherwise required.