



South Coast Air Quality Management District

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E-mailed: January 14, 2014
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Review of the Draft Mitigated Negative Declaration (MND) for the Dakota (Case Numbers 5.1310 PD 365 and TTM36548) Project

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

The proposed project is adjacent to a sensitive land use¹ (i.e., residential uses north of the project site), however, the Draft MND did not evaluate potential localized air quality impacts that could result from construction of the proposed project. Therefore, the SCAQMD staff recommends that the lead agency revise the air quality analysis to include an assessment of potential localized air quality impacts during construction of the proposed project. These potential air quality impacts should be assessed using SCAQMD's Localized Significance Methodology and compared to the localized significance thresholds specific to the project area². Further, the lead agency should ensure that all future projects include a localized air quality analysis if warranted. In the event that the lead agency determines the proposed project will result in significant localized construction air quality impacts the SCAQMD staff recommends that the lead agency require mitigation to minimize these impacts to a less than significant level. Additional construction-related air quality mitigation measures are available at: http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html

Please provide the SCAQMD staff with written responses to all comments contained herein prior to the adoption of the final CEQA document. Further, staff is available to

¹ California Air Resources Board. April 2005. "Air Quality and Land Use Handbook: A Community Health Perspective." Accessed at: <http://www.arb.ca.gov/ch/landuse.htm>

² The Localized Significance Threshold (LST) methodology and Mass Rate LST Look Up Table is available at: <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>

work with the lead agency to address these issues and any other questions regarding air quality 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,

A handwritten signature in black ink that reads "Ian V. MacMillan". The signature is written in a cursive style with a large, stylized "I" and "M".

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

IM:DG

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