



South Coast Air Quality Management District

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Mr. Carlos Jaramillo, Deputy Director
Community Development
La Habra, CA 90631

Review of the Draft Mitigated Negative Declaration for the La Bonita Park Water Facilities 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 Mitigated Negative Declaration (MND) as appropriate.

AQMD staff is concerned that the lead agency did not provide a quantitative determination of the potential air quality impacts from construction activities. The AQMD has established a simplified Localized Significance Threshold (LST) methodology to assist lead agencies in determining local air quality impacts.¹ Although the LST methodology is voluntary, CEQA Guidelines §15074 requires that a lead agency use “substantial evidence” to determine the potential significance of a project. Prior to finalizing the project, AQMD staff therefore recommends that the lead agency present the localized impacts from construction and operation of the proposed project.

The proposed project also includes a diesel emergency generator (requiring an AQMD permit) onsite adjacent to a park where children will regularly congregate. The lead agency should therefore consider adding a mitigation measure or project design feature that restricts the hours of non-emergency testing and maintenance of the generator to times when children are not anticipated to be nearby.

AQMD staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Ian MacMillan, Program Supervisor CEQA Section, at (909) 396-3244, if you have any questions regarding these comments.

Sincerely,

A handwritten signature in black ink that reads 'Ian V. MacMillan'.

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

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¹ <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>