



South Coast
Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

E-MAILED: OCTOBER 13, 2009

October 13, 2009

Mr. John Meyer
Planning Department
City of Menifee
29714 Haun Road
Menifee, CA 92586

**Draft Mitigated Negative Declaration (Draft MND) for the Proposed Change of
Zone No. 7051 and 2009-007 Tentative Tract Map (TR 32794)**

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 into the Final Environmental Impact Report.

Please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. The SCAQMD staff would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

A handwritten signature in black ink that reads "Susan Nakamura".

Susan Nakamura
Planning Manager
Planning, Rule Development & Area Sources

Attachment

SN:EE:GM

RVC090922-05
Control Number

Construction Air Quality Analysis

1. For the Final MND and for future CEQA documents, the SCAQMD staff recommends that the lead agency include at least a summary of the estimated unmitigated and mitigated construction emissions from Appendix A (Air Quality Analysis) in the draft and final documents similar to the emissions shown for operational impacts in Table 2 on page 10 of the Draft MND. Although Appendix A is noted as a footnote to Table 2, Appendix A was not included with the document when circulated for public review. This is important because, as shown in the one-page URBEMIS2007 output sheet summary subsequently provided to SCAQMD staff by the lead agency, the projected unmitigated PM10 (fugitive dust) emissions are estimated at 154.01 pounds per day, which exceeds the SCAQMD recommended regional significance threshold of 150 pounds per day. This summary information along with enough detail about the mitigation measures and control efficiencies activated in the URBEMIS2007 model needs to be available to the public, reviewing agencies and other interested parties. These details can be included in the Final MND as part of the narration or, as suggested above, in a separate table. This level of detail helps to demonstrate the lead agency's determination that project construction impacts are less than significant with mitigation.
2. In Section III – Air Quality on page 12 in the first line of paragraph five, the lead agency based its conclusion, in part, that construction air quality impacts would be less than significant by using the screening tables in Chapter 6 of the SCAQMD's CEQA Air Quality Handbook (Handbook). The SCAQMD has not supported the use of the Handbook Land Use screening tables for a number of years because those screening tables were derived using an old version of the on-road mobile source emission factor model, EMFAC7EP, and trip rates are based on an old version of the Institute of Traffic Engineers Trip Generation Manual. Therefore, the SCAQMD recommends that the lead agency strike this reference to the use of screening Table 6-2 to demonstrate that project construction impacts are less than significant and include the results of the CARB URBEMIS2007 modeling in the Final MND. Future project short- and long-term air quality impacts should continue to be estimated using the current CARB URBEMIS 2007 emissions model, following the calculation methodologies in Chapter 9 and the Appendix to Chapter 9 in the Handbook, or by using other recognized and approved methodologies, equations and emission factors. The URBEMIS 2007 emissions model can be accessed at <http://www.aqmd.gov/ceqa/models.html>, and in the event any air quality impacts are concluded to be significant, feasible mitigation measures should be identified and, if available, implemented by the project proponent. Mitigation measures for consideration by the lead agency for off- and on-road engines and fugitive dust can be found at http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html .

Construction Mitigation Measures

3. In discussions with the lead agency, the lead agency stated that the construction analysis assumed a maximum soil disturbance of five acres per day as a mitigation

measure to reduce PM10 fugitive dust air quality impacts to less than the SCAQMD recommended regional and localized significance threshold levels. The lead agency then provided, upon request by SCAQMD staff, a one page summary from the URBEMIS2007 computer modeling for construction and operation emission estimates. The summary does not show that emissions were estimated using a maximum disturbance of five acres as discussed with the lead agency. Submission and review of Appendix A (Air Quality Analysis) would allow review of that part of the construction emissions analysis. The proposed construction mitigation measure to limit soil disturbance to five acres per day, however, is not included with the measures described in pages 10 and 11 of the Draft MND. If the lead agency intends to mitigate localized PM10 fugitive dust emissions from soil disturbance, in part, by limiting soil disturbance to five acres per day, then this should be formally adopted as a mitigation measure and included with the measures listed on pages 10 and 11 of the Draft MND.

Localized Significance Thresholds

4. Since the Draft MND did not include a discussion of a localized significance thresholds analysis for construction and operation activities (see comment #3), provide an estimate of localized emissions or identify the localized significance thresholds for the project site, the SCAQMD staff requests that the lead agency include the localized significance thresholds analysis, if performed. If a localized significance thresholds analysis was not done, the project's localized air quality impacts should be estimated to ensure that nearby sensitive receptors are not adversely impacted by construction or operational activities that would occur at the project site. SCAQMD staff notes that on page 2 through 3 of the Draft MND, the lead agency has identified sensitive receptors that are predominantly residential sites. The SCAQMD's guidance for performing a localized air quality analysis is available at the following web address <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>.

In the event that the lead agency's localized air quality analysis requested above demonstrates that any criteria pollutant exceeds SCAQMD's localized significance threshold the SCAQMD staff recommends, that, if feasible, the lead agency consider the mitigation measures found at the following website: http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html .