



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
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SENT VIA E-MAIL AND USPS:

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[rfowler@cityofmenifee.us](mailto:rfowler@cityofmenifee.us)

Ryan Fowler, Planning  
City of Menifee  
29714 Haun Rd.,  
Menifee, CA 92586

## **Project Consultation for the Rockport Ranch Residential Development**

The South Coast Air Quality Management District (SCAQMD) staff 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 Draft CEQA document. The Lead Agency proposes to develop 305 residential dwellings. The project is expected to be completed in 2020.

The Lead Agency has determined that project mitigated air quality impacts would result in less than significant impacts during construction and operational activities. The proposed project is projected to be completed by 2020; however, the air quality analysis model indicates that the project will be completed in 2024. The completion date and phases should be consistent throughout the document including the air quality analysis. Otherwise, the construction air quality impacts from construction are underestimated. SCAQMD staff recommends revising the air quality modeling to be consistent with the project description and re-evaluating the significance of the project impacts.

Additionally, the proposed project is also adjacent to sensitive land uses<sup>1</sup> (i.e., residents to the west); however, the air quality analysis did not evaluate potential localized air quality impacts resulting 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 demolition and construction of the proposed project. These potential air quality impacts should be analyzed using SCAQMD's Localized Significance Methodology<sup>2</sup>.

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<sup>1</sup> 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>

<sup>2</sup> 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>

The SCAQMD staff is available to work with the Lead Agency to address these concerns and any other air quality questions that may arise. Please contact Jack Cheng, Air Quality Specialist at (909) 396-2448, if you have any questions regarding these comments. We look forward to reviewing and providing comments for the Draft CEQA document associated with this project.

Sincerely,

*Jillian Wong*

Jillian Wong, Ph.D.

Planning and Rules Manager

Planning, Rule Development & Area Sources

JW:JC

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