



## South Coast Air Quality Management District

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E-MAILED: June 24, 2011

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### **Draft Mitigated Negative Declaration (Draft MND) for the Proposed Simms Tentative Tract No. PA10-0213 Project**

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 Mitigated Negative Declaration.

In the Draft MND, the lead agency proposes to divide a project site that includes four lots on an approximate 32.85 acre parcel. The project site would be divided into 15 residential lots ranging in size from 1.31 - 2.80 acres per lot. AQMD staff is concerned about potential localized air quality impacts to sensitive receptors (i.e., residences) that surround the project site.

In the Air Quality Assessment (AQ Assessment), the lead agency has estimated regional emission impacts but did not estimate localized air quality impacts. The AQ Assessment incorrectly states on page 18 that a localized significance thresholds (LST) analysis is not warranted because the total site exceeds 30 acres. The AQMD LST Methodology Document guidelines allow for use of the LST "lookup tables" for projects five acres or less but still recommends dispersion modeling for projects disturbing greater than five acres in one day<sup>1</sup>. Although AQMD's LST guidance is voluntary, a lead agency still must demonstrate under CEQA that a project does not exceed applicable Ambient Air Quality Standards during construction and operation. Currently, the lead agency has estimated regional construction grading emissions using the URBEMIS2007 land use computer model assuming 8.25 acres as the maximum daily acreage disturbed during grading in its analysis. As an alternative, the lead agency could use the AQMD LST lookup tables found at the website mentioned below<sup>1</sup> providing that a mitigation measure be adopted consistent with a five acre per day grading limit, if applicable and feasible. Otherwise, for soil disturbance over five acres per day, dispersion modeling is recommended to estimate localized impacts.

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

<sup>2</sup> [www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html)

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In the event that the lead agency finds any significant localized air quality impacts from the proposed project the lead agency should consider all feasible mitigation measures to reduce the project's air quality impacts<sup>2</sup>.

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 available to work with the Lead Agency to address these issues and any other air quality 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,



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

Attachment

IM:GM

RVC110525-01  
Control Number