



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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City of Rancho Mirage
69-825 Highway 111
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Draft Mitigated Negative Declaration (Draft MND) for the Proposed Rancho Bella Project (Tent. Tract Map No. 36553, PDP/Case No. PDP13005 and EA130010)

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 Final CEQA document.

In the project description, the lead agency proposes construction that includes 122 single-family residences on a 36.68-acre site. Although the lead agency has determined that project short- and long-term air quality impacts would not result in significant air quality impacts with mitigation, the potential quantified regional and localized impacts were not included in the Air Quality Section of the Draft MND. The SCAQMD staff therefore recommends that these quantified air quality impacts be presented, compared with the SCAQMD's recommended significance thresholds, and included in the Final MND. At minimum, the emissions should be summarized in the narration, in table(s) or included as an appendix. Otherwise the lead agency has not demonstrated that project air quality impacts are less than significant.

SCAQMD guidance for performing an air quality analysis can be found on the SCAQMD web site.¹ In addition, the free, user-friendly California Emissions Estimator Model (CalEEMod) software from the California Air Pollution Control Officers Association (CAPCOA) is available to quantify project emissions.² In addition to evaluating regional air quality impacts, the SCAQMD staff recommends that the lead agency estimate localized air quality impacts to ensure that any nearby sensitive receptors are not adversely affected by the construction activities that are occurring nearby. It is noted on page two in the project description and in an aerial map inspection that the proposed project is located within one-quarter mile of sensitive receptors (residential properties north and south and Ranch Mirage High School to the north) north and south of the proposed project. Guidance for estimating localized impacts can also be found at the

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

² www.caleemod.com

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2

February 28, 2014

SCAQMD web page.³ Should the lead agency conclude after its analyses that construction or operational localized air quality impacts exceed the SCAQMD daily significance thresholds, staff has compiled mitigation measures in addition to those measures listed starting on page 16 of the Draft MND that can be implemented if the air quality impacts are determined to be significant.⁴

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. The SCAQMD staff is available 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,



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

IM:GM

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³ <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>

⁴ http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html