



# South Coast Air Quality Management District

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Ms. Maureen Losey, Assistant Planner  
City of Hemet  
Planning Department  
445 E. Florida Avenue  
Hemet, CA 92543

**Mitigated Negative Declaration (MND) for the Proposed General Plan Amendment  
No. 04-01, Zone Change No. 04-1, Conditional Use Permit No. 04-20, Environmental  
Assessment No. 04-02**

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 Negative Declaration (MND).

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final Negative Declaration. The SCAQMD 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,

Steve Smith, Ph.D.  
Program Supervisor, CEQA Section  
Planning, Rule Development & Area Sources

Attachment

SS:GM

RVC050308-03  
Control Number

**Mitigated Negative Declaration (MND) for the Proposed General Plan Amendment No. 04-01, Zone Change No. 04-1, Conditional Use Permit No. 04-20, Environmental Assessment No. 04-02**

1. On page 15, the Summary Report of Air Emissions table provides the results of the URBEMIS 2002 model. Since the Draft MND did not include the output sheets from the model, SCAQMD staff ran the model, based on the project description, to corroborate the results. Therefore, the following comment is made based on the SCAQMD staff URBEMIS 2002 model emission results for the proposed project compared to the lead agency's results from Summary Report on page 15:
  - Using the URBEMIS 2002 model's defaults, it appears that construction emissions listed in the table on page 15 are underestimated. For example, assuming four pieces of construction equipment, which is the default assumption (a tracked loader, a wheeled loader, a motor grader and a water truck), per 10 acres of soil disturbance per day, the NO<sub>x</sub> emission estimates would be notably higher than what is estimated in the Draft MND Summary Report.

In order to ensure that default equipment values are applied in the program, please ensure that any changes to the View Land Use Settings icon in the program e.g., the unit amounts, are activated by clicking the "OK-Apply Changes" button. Then, under the "View Construction Settings" icon, ensure that any changes to the program, e.g. construction start year, etc. are activated by again clicking on the "OK - Apply Changes" button. Next, in the same "View Construction Settings" screen, highlight and click on "Phase 2: Site Grading" under Construction Emission Source. When that window appears, highlight the "Equip Exhaust – 1" button. Click on "OK Apply Changes" button and then repeat these steps for the remaining two "Equip Exhaust – 2" and "Equip Exhaust – 3" buttons. The default equipment values will appear as applicable in the "Equip Exhaust – 1,2, or 3" screens. The PM<sub>10</sub> and NO<sub>x</sub> values for site grading activities for fugitive dust and equipment exhaust will then reflect the activated URBEMIS 2002 default values for area disturbed and the default equipment values in the model. If the construction defaults have not been activated for this project, it is recommended that the lead agency re-run the model and revise the resulting emission estimates.

In the Final MND and for future environmental analyses, it is recommended that the lead agency include the model's output sheets along with the assumptions and any changes made to the model to estimate construction and operational emissions in an appendix. This will facilitate evaluation of the model's results by the public. The additional information can be added as an appendix, as footnotes, or as part of the narration.