



# South Coast Air Quality Management District

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FAXED: MAY 27, 2005

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Ms. Cheryl Kitzerow, Associate Planner  
City of Temecula  
Planning Department  
P.O. Box 9033  
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**Draft Mitigated Negative Declaration (MND) for the Proposed Margarita Village  
Specific Plan Amendment and Vineyard View Estates Tentative Tract Map Number  
23103-2 (PA04-0392)**

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 (MND).

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

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

Attachment

SS:GM

RVC050503-01  
Control Number

Ms. Cheryl Kitzerow  
Associate Planner

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1. In Section III. Air Quality a) on page 6, the lead agency based its conclusion that construction air quality impacts would be insignificant 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. As a result of relying solely on those tables, instead of quantifying short-term air quality impacts, the lead agency has not demonstrated that project construction air quality impacts are less than significant. Therefore, the SCAQMD recommends that the lead agency demonstrate that project construction air quality impacts are less than significant in the Final MND by estimating short-term air quality impacts using the current CARB URBEMIS 2002 emissions model (as the lead agency has done in the Draft MND to estimate operational air quality impacts) or following the calculation methodologies in Chapter 9 and the Appendix to Chapter 9 in the Handbook in the Final MND. The URBEMIS 2002 emissions model can be accessed at <http://www.arb.ca.gov/planning/urbemis/urbemis2002/urbemis2002.htm> . 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.