



South Coast Air Quality Management District

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FAXED: FEBRUARY 1, 2006

February 1, 2006

Mr. Richard Masyczek
City of Hemet
Planning Department
445 East Florida Avenue
Hemet, CA 92543

**Mitigated Negative Declaration (MND) – CUP No. 0505 & EA No. 05-22
Mini Storage: Hemet**

Dear Mrs. Masyczek:

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 in the Final Mitigated Negative Declaration.

Please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Mitigated 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 Charles Blankson, Ph.D., Air Quality Specialist – CEQA Section, at (909) 396-3304 if you have any questions regarding these comments.

Sincerely

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

Attachment

SS: CB

RVC060117-01
Control Number

Mitigated Negative Declaration (MND) – CUP No. 05-05 & EA No. 05-22
Mini Storage: Hemet

1. **Project Air Quality Emissions:** The lead agency states on page 11 of the MND that “The proposed project would not conflict with or obstruct implementation of any air quality plan beyond what has been anticipated in the General Plan EIR.” The lead agency, however, does not provide any data or analysis to demonstrate that the proposed project will not conflict with or obstruct implementation of the air quality plan.

The lead agency has also not quantified operational air quality impacts and, therefore, has not demonstrated that operational air quality impacts will not be significant. Although CEQA allows a lead agency to tier off of a program EIR including a General Plan EIR, it is necessary to quantify air quality impacts to demonstrate that impacts from the proposed project are within the scope of the analysis in the General Plan EIR.

The lead agency also states that there may be temporary air quality impacts from grading and construction of the buildings, and that the “General Plan requires that construction activity include appropriate measures to minimize fugitive dust such as minimizing the amount of clearing and grading, regular watering of graded areas, and suspension of grading activities during second and third stage smog alerts or when wind speeds exceed 25 miles per hour.” The lead agency concludes that complying with these existing policies should result in a less than significant impact to sensitive receptors.

Please note that without quantifying air quality impacts from the proposed project, the lead agency has not demonstrated that the proposed project’s air quality impacts are not significant. To calculate potential adverse air quality impacts from the proposed project, the SCAQMD recommends that the lead agency use either the emission calculation methodologies from the 1993 SCAQMD CEQA Air Quality Handbook or use the current version of the California Air Resources Board (CARB)-approved model URBEMIS 2002, which is available on the SCAQMD website at: www.aqmd.gov/ceqa/models.html. If quantification of emissions reveals that project emissions exceed the established significance thresholds, then mitigation measures must be required by the lead agency to reduce those emissions to less than significance.

2. **Emissions From Former Site Use:** Review of the environmental site assessment (ESA) in Appendix A shows that since at least 1958 the depression on the property was used as a dump. As a result, the property site may be subject to the provisions of SCAQMD Rule 1150.1 – Control of Gaseous Emissions from Municipal Solid Waste Landfills. Further, according to the ESA there is consideration of removing the debris and disposing of it in a municipal landfill such as Lamb Canyon. If the debris is removed, the site would also be subject to

- SCAQMD Rule 1150 – Excavation of Landfill sites. The project proponent needs to contact the SCAQMD to confirm that the site is subject to Rules 1150.1 and 1150 and, if subject to these rules, determine which specific requirements apply.
3. **Truck Trips:** According to the ESA, the site contains approximately 2000 cubic yards of debris which may be excavated and transported to a nearby landfill. As noted in the ESA, one truck can transport 14 cubic yards of material, resulting in at least 143 truck trips. When quantifying construction emissions, transport truck emissions should be calculated and factored into the construction emission results.
 4. **Localized Impacts:** Consistent with the SCAQMD's environmental justice program and policies, the SCAQMD recommends that the lead agency also evaluate localized air quality impacts. SCAQMD staff recommends that the lead agency undertake the localized analysis to ensure that all feasible measures are implemented should the analysis demonstrate that construction NO_x and CO emissions are significant. Since the project is less than five acres in area, project construction has the potential to raise localized ambient concentrations. The methodology for conducting the localized significance thresholds analysis can be found on the SCAQMD website at:
www.aqmd.gov/ceqa/handbook/LST/LST.html.