



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

FAXED: MAY 10, 2005

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Mr. Matthew Feske
Department of Planning and Zoning
City of Palm Springs
3200 E. Tahquitz Canyon Way
Palm Springs, CA 92262

**Negative Declaration for the proposed Development of Eight (8) Apartment
Units at 199 Via Olivera**

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.

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final 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

RVC050419-02
Control Number

**Negative Declaration for the proposed Development of Eight (8) Apartment Units at
199 Via Olivera**

1. The lead agency has concluded on page 1.0-9 in Section III. Air Quality of the Draft Negative Declaration (Draft ND) that the proposed project will have no significant air quality impacts. The lead agency did not, however, support its conclusion by quantifying the proposed project's construction and operational air quality impacts. This is important because although the proposed construction activities are temporary in nature, residences and a hotel are described as being north and east of the proposed site may be exposed to emissions from fugitive dust, off- and on-road vehicles and equipment, architectural coatings and other emission sources listed in the project description. The SCAQMD therefore recommends that for this current project and for future projects that the lead agency quantify short- and long-term air quality impacts.

To quantify air quality impacts, the lead agency can utilize the current CARB URBEMIS 2002 emissions model, which can be accessed at <http://www.arb.ca.gov/planning/urbemis/urbemis2002/urbemis2002.htm> or follow the calculation methodologies in Chapter 9 and the Appendix to Chapter 9 in the South Coast AQMD's CEQA Air Quality Handbook.

2. In the Final ND, the lead agency should incorporate the affects of complying with SCAQMD Rule 403 – Fugitive Dust, into the construction air quality analysis.