



South Coast Air Quality Management District

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September 16, 2005

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

Negative Declaration (ND) for the Proposed Zone Change No. 05-03, Tentative Tract Map No. 33075, Site Development Review No. 05-09 and Environmental Assessment No. 05-15, Autumn Ridge II Project

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 (ND).

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

RVC050906-02
Control Number

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1. On page 18 of the Draft ND, the lead agency states that the General Plan allows up to seven dwelling units per acre or 70 units, while the proposed project will be built at a lower density, 38 units. This characterization appears to be inconsistent with the project description which states that the proposed project includes a request for approval of a change of zone from A-1-C (agricultural) to R-1-7-2 (single-family residential). This would appear to be an increase in density. As a result, the characterization that the proposed project will have lower air quality impacts than what was considered in the General Plan does not appear to be accurate.
2. The lead agency has concluded on page 18 in Section III b,c). Air Quality of the Draft Negative Declaration (Draft ND) that the proposed project will have less than significant air quality impacts stating, in part “that air quality impacts from construction activities are difficult to quantify because they occur on a temporary basis and fluctuate in relative strength.” Therefore the lead agency did not support its conclusions of less than significant impact on page 17 by quantifying the proposed project’s construction air quality impacts. The lead agency also did not estimate operational air quality impacts but relied on a previous General Plan (date of General Plan not stated) on page 8 that “allowed up to up to 70 units.” The proposed project would create 38-lots for single-family residences.

In the Final ND and for future CEQA analyses, it is requested that the lead agency demonstrate that construction air quality impacts are less than significant by making reasonable assumptions based on the project description using emission factors, equations and methodologies that are currently available to estimate short-term air quality impacts. It is important that construction impacts be estimated because although the proposed construction activities are temporary in nature and the sensitive receptors (Cawston Elementary School [0.3 mile] and Fruitvale Elementary School [0.5 mile]) are over a quarter of a mile away, the lead agency has mentioned on page 19 (e) that there are also a number of tracts under development surrounding the project site. This could create a cumulative effect on these and other surrounding sensitive receptors in which they may be exposed to project emissions from fugitive dust, off- and on-road vehicles and equipment, architectural coatings and other emission sources listed in the project description and from construction emission impacts from the surrounding concurrent projects described on page 19. 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.

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In addition, if the lead agency is relying on a previous analysis, then at minimum, summary information in the form of a table or as an appendix should be included in the Final ND and in future CEQA documents to support its findings. If the air quality analysis was completed some time ago, then a more current analysis should be included in the Final ND and for future CEQA analyses that would better represent current and future project operational emission air quality emission impacts. Current EMFAC 2002 emission factors from the CARB, for example, represent the most current on-road vehicle emission factors. Relying on the analysis for the 1992 General Plan would be expected to result in the lead agency substantially underestimating operational emissions since on-road mobile source emission factors and other parameters are out of date.

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.

In the event that quantification of the air quality impacts from the proposed project, either construction and/or operational, exceed established significance thresholds, mitigation measures may be necessary. In addition to identifying feasible mitigation measures, the lead agency should specify the control efficiency of each mitigation measure (if one is available) and apply the control efficiency to the total emissions estimated for the project. In this way the lead agency can quantitatively determine the significance of air quality impacts from the proposed project.