



South Coast Air Quality Management District

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FAXED: FEBRUARY 2, 2006

February 2, 2006

Mr. Diane Bullock
City of Palm Springs
Planning Department
3200 East Tahquitz Canyon Way
Palm Springs, CA 92263-2743

**Negative Declaration (ND) – 803 N. Palm Canyon LLC
Palm Springs**

Dear Ms. Bullock:

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 Negative Declaration.

Please provide the SCAQMD with written responses to all comments contained herein prior to the certification 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 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

RVC060113-05
Control Number

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Palm Springs**

1. **Project Air Quality Emissions:** The lead agency states on page 15 of the ND that “the project is not anticipated to conflict with or obstruct implementation of 2003 AQMP. The site is located in an established urban area. No sensitive receptors are located within approximately one mile of the project boundary nor is the creation of objectionable odors expected from the proposed project. Therefore, the proposed project will have no potentially significant air quality impacts.” The lead agency provides no data or quantitative estimates to support the conclusion that the proposed project’s air quality impacts will not be significant.

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. **Localized Impacts:** The lead agency states on page 15 of the ND that there are no sensitive receptors located within one mile of the project boundary. However, on page 5, the surrounding land use to the west is residential, which according to the map on page 3 appears to be adjacent to the proposed project. Consistent with the SCAQMD’s environmental justice program and policies, the SCAQMD recommends that the lead agency also evaluate localized air quality impacts to nearby receptors. 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.