



South Coast  
Air Quality Management District

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September 12, 2008

Mr. Ken Lyon, Associate Planner  
Planning Division  
City of Palm Springs  
3200 East Tahquitz Canyon Way  
Palm Springs, CA 92262

**Draft Mitigated Negative Declaration (Draft MND) for the Proposed Vista Chino  
Self Storage**

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.

The SCAQMD would welcome any 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,

Susan Nakamura  
Planning & Rules Manager  
Planning, Rule Development & Area Sources

Attachment

SN:GM

RVC080822-02  
Control Number

### **Construction Air Quality Analysis**

1. On page 14 in the Initial Study/Draft MND, the lead agency estimated operational air quality impacts using the URBEMIS 2002 version 2.2 computer model. In the Final MND and for future projects, please include all of the computer model output sheets from the URBEMIS modeling including all changes made by the lead agency to any modeling default settings.

For future projects using the URBEMIS to estimate project emission impacts, the lead agency should utilize the current URBEMIS 2007 version 9.2.4 land use emissions model, which is an updated version of the URBEMIS model and was originally released in June 2007. The URBEMIS 2007 model includes updated on-road and off-road mobile source emission factors, as well as other enhancements. URBEMIS 2007 version 9.2.4 can be accessed at <http://www.urbemis.com/> or the lead agency can follow the calculation methodologies in Chapter 9 and the Appendix to Chapter 9 in the South Coast AQMD's CEQA Air Quality Handbook. Should the lead agency conclude after its analyses that construction or operational air quality impacts exceed the SCAQMD daily significance thresholds, staff has compiled mitigation measures to be implemented if the air quality impacts are determined to be significant. Mitigation measure suggestions can be found at [http://www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html) .

2. In Table III-5, the lead agency estimated construction equipment and worker trip emissions but did not reference the methodology, emission factors or equations used to estimate those emissions. Please include the source of all emission estimates along with any equations, emission factors, etc. in the Final MND. This can be done in the narration, as table footnote or in an appendix.

### **PM2.5 Significance Thresholds**

3. In response to adoption of PM2.5 ambient air quality standards by U.S. EPA and CARB, SCAQMD staff has developed a methodology for calculating PM2.5 emissions when preparing air quality analyses for California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) documents. To determine if PM2.5 air quality impacts are significant, SCAQMD staff has also developed recommended regional and localized significance thresholds. When preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a PM2.5 significance analysis by following the guidance found at [http://www.aqmd.gov/ceqa/handbook/PM2\\_5/PM2\\_5.html](http://www.aqmd.gov/ceqa/handbook/PM2_5/PM2_5.html) . Further, SCAQMD staff has compiled mitigation measures to be implemented if the PM2.5 impacts or other pollutant air quality impacts are determined to be significant. Mitigation measure suggestions can be found at [http://www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html) .

**Localized Significance Thresholds**

4. As noted in the Project Description on page 2 under surrounding land uses, the proposed project is located within one-quarter mile of sensitive receptors (residential properties) located south of the proposed project. Therefore, the SCAQMD requests that the lead agency evaluate localized air quality impacts to ensure that any nearby sensitive receptors are not adversely affected by the construction activities that are occurring in close proximity. SCAQMD guidance for performing a localized air quality analysis can be found at the following web address: <http://www.aqmd.gov/ceqa/handbook/LST/LST.html> .