



March 18, 2015

Mr. Marvin Roos
MSA Consulting, Inc.
34200 Bob Hope Drive
Rancho Mirage, CA 92270

Subject: Palm Springs Country Club Air Quality Impact Study – Response to Comments

Dear Mr. Roos;

Endo Engineering prepared a response to comments on the air quality study for the Palm Springs Country Club by Michael Baker from RBF. Each comment on the air quality study is provided followed by our response.

Comment 1: 3-10 Paragraph 5: The discussion only mentions SCAQMD's MATES II study (released in March 2000). The follow-up to this study, MATES III, was released in 2008. The discussion should also refer to SCAQMD's MATES IV study, which was released October 3, 2014.

Response 1: The SCAQMD *Multiple Air Toxics Exposure Study* (MATES IV) was released five months after the air quality study was completed. MATES III reached essentially the same conclusions that were attributed to MATES II (2000) in the air quality study. MATES III (September, 2008) analyzed a second year of ambient air quality monitoring data collected at the same ten locations used for MATES II to estimate the lifetime carcinogenic risk of living in the SCAB. The new data was processed in a different manner, but the conclusion of MATES III was that the lifetime carcinogenic risk of living in the SCAB, where air pollutant concentrations exceed the health-based air quality standards, is 1,200 (rather than 1,400) excess cancers per million people with lifetime exposures. The range was 870 to 1,400 excess cancers. MATES III estimated that 94% (rather than 90%) of the risk can be attributed to motor vehicle emissions. Diesel particulate exhaust was still the predominant source of the excess cancer risk (84%).

Comment 2: 3-20 Second to last and last paragraph: Clarify that the Coachella Valley is the Salton Sea Air Basin to avoid confusion with the references to the South Coast Air Basin.

Response 2: The paragraphs referenced do not mention the South Coast Air Basin or the Salton Sea Air Basin. Section 3 states repeatedly that the Coachella Valley is located within the Salton Sea Air Basin. Figure 3-1 shows the Coachella Valley within the Salton Sea Air Basin. There should be no confusion as to whether or not the Coachella Valley is within the Salton Sea Air Basin.

Comment 3: 3-27 Sixth Paragraph: Please provide a source for the CARB performance standards.

Response 3: The CARB performance standards were not included in the first workshop Preliminary Draft Staff Proposal entitled *Recommended Approaches for Setting Interim Significance Thresholds for Greenhouse Gases Under CEQA* (October 24, 2008). As stated in paragraph 4 on page 3-27, the CARB staff's proposed performance standards were provided at the second CARB public workshop on December 9, 2008.

Comment 4: N/A Section 4.2 and 4.3: Include a construction and operational Localized Significance Threshold (LST) analysis per SCAQMD recommendations. (refer to: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysishandbook/localized-significance-thresholds>).

Response 4: The SCAQMD has developed LST look-up tables to assist lead agencies in analyzing localized air quality impacts associated with proposed projects which are 5 acres or less in size. The use of LSTs by local governmental agencies is voluntary (i.e., to be implemented at the discretion of local agencies) not mandatory. As stated on page 1-2 and 1-3 of *Final Localized Significance Threshold Methodology*:

"This methodology and associated LSTs are recommendations only and not mandatory requirements. The methodology and LSTs may be used at the discretion of the local lead agency....Proposed projects whose calculated emission budgets for the proposed construction or operational activities are above the LST emission levels found in the LST mass rate look-up tables should not assume that the project would necessarily generate adverse impacts....The lead agency may choose to describe project emissions above those presented in the LST mass rate look-up tables as significant or perform detailed air dispersion modeling or perform localized air quality impact analysis according to their own significance criteria."

Comment 5: 4-20 Operational GHG emissions should include construction emissions amortized over 30 years. Amortized construction emissions should be added to the operational emissions total (refer to: [http://www.aqmd.gov/docs/defaultsource/ceqa/handbook/greenhouse-gases-\(ghg\)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-5/ghgmeeting-5-minutes.pdf](http://www.aqmd.gov/docs/defaultsource/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-5/ghgmeeting-5-minutes.pdf)). Additionally, it is recommended that the SCAQMD's GHG CEQA Significance Threshold Working Group proposed service population threshold is used for a project of this size.

Response 5: Although CEQA documents must include an evaluation of project-related GHG emission impacts, there is currently no significance threshold for GHG emissions associated with residential projects adopted by the SCAQMD or the CARB. Unless significant GHG impacts are identified, no mitigation is required. To be in conformity with the statewide goal of reducing greenhouse gas (GHG) emissions, the project should emit as few GHGs as feasible. As the lead agency, the City of Palm Springs has the authority to identify those measures identified in Appendix F that are feasible for the proposed project.

The SCAQMD has adopted operational GHG significance thresholds for stationary industrial sources of air pollution for which the SCAQMD is the lead agency. In analyzing whether or not a proposed industrial source will exceed those operational GHG significance thresholds, the SCAQMD protocol specifies that the construction-related emissions be amortized over 30 years and added to the operational emissions because there are no separate construction-related GHG significance thresholds. Since the project is residential, not industrial and the SCAQMD is not the lead agency, this procedure is not applicable to the proposed project.

Comment 6: 4-21 First full paragraph: As GHG emissions exceed thresholds, the analysis should identify all feasible mitigation (in addition to the identified project design features). Reduction associated with implementation of each feasible mitigation measures and project design features should be quantified.

Response 6: Appendix F includes an extensive list of potential measures to reduce GHG emissions for consideration by the applicant and the lead agency. The effectiveness of any specific measures therein that are incorporated in the project can be evaluated using CalEEMod. As the lead agency, the City of Palm Springs has the authority to identify those measures identified in Appendix F that are feasible for the proposed project.

We trust that this information will assist you in your coordination with the City of Palm Springs. If you have additional questions, please do not hesitate to contact me by telephone at (949) 362-0020, or by e-mail at endoengr@cox.net.

Sincerely,
ENDO ENGINEERING

Gregory Endo
Principal