



South Coast
Air Quality Management District

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November 12, 2009

Mr. Christopher Carnes, Project Planner
City of Murrieta
1 Town Square 24601
Murrieta, CA 92562

**Draft Mitigated Negative Declaration (Draft MND) for the Proposed Tentative
Parcel Map No. 34255 (City Application No. 006-2006)**

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.

Please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. 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,

A handwritten signature in black ink that reads "Susan Nakamura".

Susan Nakamura
Planning Manager
Planning, Rule Development & Area Sources

Attachment

SN:EE:GM

RVC091013-03
Control Number

Construction/Operation Air Quality Analysis

1. In the Draft Mitigated Negative Declaration's (Draft MND) project description, the lead agency proposes the subdivision of approximately 10 acres into 10 parcels for future industrial use development. The project description also describes the importation of approximately 24,500 cubic yards of material during site grading. The Draft MND, however, does not quantify the project's construction or operation air quality impacts. Because this information has not been included in the Draft MND, the lead agency has therefore not demonstrated that the proposed project will not generate significant adverse construction or operational air quality impacts that may trigger further analysis pursuant to the California Environmental Quality Act.

To calculate the proposed project's emission impacts, the lead agency can utilize the current URBEMIS 2007 version 9.2.4 land use emissions model, which can be accessed at <http://www.aqmd.gov/ceqa/models.html> 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

PM2.5 Significance Thresholds

2. 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 . 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 .

Localized Significance Thresholds

3. The SCAQMD staff requests that the lead agency evaluate the project's localized air quality impacts to ensure that any nearby sensitive receptors or workers are not adversely impacted by construction or operational activities that would occur at the project site. SCAQMD staff notes that on page 2 under surrounding land uses, the

existing land uses include a light industrial and low-density single family resident surrounding the site. The SCAQMD's guidance for performing a localized air quality analysis is available at the following web address:

<http://www.aqmd.gov/ceqa/handbook/LST/LST.html>.

In the event that the lead agency's localized air quality analysis requested above demonstrates that any criteria pollutant exceeds SCAQMD's localized significance threshold, the SCAQMD staff recommends, that, if feasible, the lead agency consider the mitigation measures found at the following website:

http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html .

Potential Export and Disposal of Contaminated Soils

4. In the project description on page 2, the lead agency states that three above-ground storage tanks will be removed from the proposed site. If the lead agency encounters contaminated soil from fuel that was stored in the above-ground storage tanks during this removal and cleanup process, compliance with SCAQMD Rule 1166 - Volatile Organic Compound Emissions from Decontamination of Soil should be cited in the Final MND, if applicable.