



South Coast Air Quality Management District

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Draft Mitigated Negative Declaration (Draft MND) for the Proposed Guava Street Bridge at Murrieta Creek Project

The South Coast Air Quality Management District (AQMD) 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 CEQA document.

The project proposes construction that would include the demolition of an existing bridge between Brown Street and Guava Street followed by the construction of a new 450 foot bridge at a location nearby. In addition, the proposed project would extend Guava Street about a quarter mile from Washington Avenue to Murrieta Street. The construction activities would include bridge demolition and bridge construction, and extending paved roadways. Construction of the proposed project is expected to last between 10 and 12 months.

AQMD staff is concerned that the lead agency has not adequately disclosed the regional and localized air quality impacts of this project in the information in the materials made available for review. The AQMD has developed guidelines to assist public agencies with the preparation of air quality CEQA analyses.¹ In particular, localized significance thresholds (LST's) have been developed to determine potentially significant impacts from construction activities. Quantification of air quality impacts from this construction were not presented in the Draft MND, yet the lead agency determined that air quality impacts would be less than significant. The lead agency states that "no quantitative estimates of regional construction emissions have been made" because this analysis is not required under federal conformity regulations. This rationale ignores the requirements of state law, namely the California Environmental Quality Act (CEQA), which requires a lead agency to determine significant impacts using substantial evidence based on scientific and factual data (CEQA Guidelines §15064). AQMD staff encourages the lead agency to quantify any potential air quality impacts prior to making a significance determination in the Final MND. If impacts are found to be significant, all feasible mitigation measures should be considered.

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In addition to evaluating the above-mentioned air quality impacts, the AQMD recommends that the lead agency estimate 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. It is noted on page five under surrounding land uses and in an aerial map inspection that the proposed project is located within one-quarter mile of sensitive receptors (residential property) north, south and east of the proposed project. AQMD guidance for performing a localized air quality analysis can be found on the AQMD web page.² Should the lead agency conclude after its analyses that construction or operational localized air quality impacts exceed the AQMD daily significance thresholds, staff has compiled mitigation measures in addition to those measures listed on pages 11-13 of the Draft EIR that can be implemented if the air quality impacts are determined to be significant.³

Please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. The AQMD staff is available to work with the Lead Agency to address these issues and any other air quality 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,



Ian MacMillan
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IM:GM

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¹ <http://www.aqmd.gov/ceqa/hdbk.html>

² <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>

³ http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html