



# South Coast Air Quality Management District

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**FAXED: JULY 21, 2005**

July 21, 2005

Mr. Dennis Watts  
City of Murrieta  
Planning Department  
26442 Beckman Court  
Murrieta, CA 92562

**Mitigated Negative Declaration (MND) – Development Plan  
(Case 01-195) and Vesting TPM 30394  
(June 2005)**

Dear Mr. Watts:

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 Mitigated Negative Declaration. The SCAQMD requests that for all future projects, the lead agency provide the SCAQMD with all support information relating to the air quality analysis including appendices, technical reports, model outputs, etc., along with the draft CEQA document.

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

RVC050623-04  
Control Number

**Mitigated Negative Declaration (MND) – Development Plan (Case 01-195)  
Murrieta, June 2005**

1. **SCAQMD Screening Tables:** On page 29 of the MND, the lead agency concludes that the proposed project will not generate significant adverse air quality impacts because the project does not exceed the 261 units or 177 acre-significance threshold for multi-family residential projects in the screening tables in Chapter 6 of the 1993 SCAQMD CEQA Air Quality Handbook (Handbook). Although the lead agency appeared to use the URBEMIS 2002 model to quantify air quality impacts, the lead agency should be aware that the SCAQMD no longer supports the use of these tables, and requests that the lead agency refrain from using them for this or future projects. This is because the mobile source emission factors used in the tables are from an old version of the California Air Resources Board (CARB) EMFAC model. The current version is EMFAC 2002. Furthermore, the trip generation rates used in the screening tables are from an older version of the Institute of Transportation Engineers (ITE) Trip Generation Manual. The current version is the seventh.
  
2. **URBEMIS 2002 Model:** The lead agency states on page 30 of the MND that in order to verify the Handbook screening threshold values, it used URBEMIS 2002 to estimate the proposed project's air quality emissions. Although the use of URBEMIS 2002 to estimate project emissions is recommended by the SCAQMD, the lead agency did not include the URBEMIS output printout in the MND. Subsequently, there is no information on any of the assumptions that were used to generate the emissions numbers stated in the MND. As a result, the SCAQMD was unable to review any changes to the model's default input parameters to determine if they were reasonable or appropriate for any of the construction sub phases or during project operation.

Despite two calls by SCAQMD staff to the lead agency to provide the URBEMIS 2002 printout and the assumptions, the lead agency failed to provide the output printout. SCAQMD staff is therefore unable to confirm the lead agency's conclusion that the proposed project's air quality impacts will not be significant.