South Coast
Air Quality Management District
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FAXED: FEBRUARY 9, 2006

February 9, 2006

Mr. Jim Mackenzie
City of Murrieta
Planning Department
26442 Beckman Court
Murrieta, CA 92562

Draft Environmental Impact Report (DEIR) for
The Marquis Commercial Project. December 2005

Dear Ms. Mackenzie:

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 Environmental Impact Report.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Environmental Impact Report. 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
RVC051229-01
Control Number

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CO Hotspots Analysis

- The Limited Air Quality Analysis in Appendix C states that the CO hotspots analysis was completed according to the CALTRANS Transportation Project-Level Carbon Monoxide Protocol (CO Protocol), Revised December 1997, UCD-ITS-RR-97-21. However, the CO analysis appears to deviate from the CO Protocol. The CO Protocol states that receptors should be placed at a minimum three meters from the roadway. The Keith Road and Winchester Road receptors are placed at either about three or 12 meters from the road edge. Since most roads have side walks receptors at the minimum three meters from the roadway are expected. The Final EIR should ensure that the receptors are placed correctly and include areas such as side walks.

- Roadway links have been modeled as overlapping free-flow and queue links. Overlapping free-flow and queue links are recommended for CAL3QHC, but not for CALINE4. The CO Protocol recommends that: approach, departure and dedicated left turn links with emission factors be adjusted by red time.

  It is not clear if the roadway widths are modeled correctly. The roadway widths are presented as 10 meters. The standard lane width is approximately three meters. Using the Clinton Keith Road and Winchester Road as an example, the HCM output shows that there are at least two lanes north and two lanes south bound. Based on four standard lanes the road width would be six meters in both directions. The CO Protocol states that receptors should be placed at a minimum three meters from the roadway; therefore, the combined north/south link should be at least 18 meters wide. The Final EIR should include roadways modeled according to the CO Protocol.

- The traffic volumes were developed from the daily volumes according to page 3 of the Limited Air Quality Analysis. Since HCM volumes are available by hour in the Traffic Report, the hourly HCM volumes should be used in the Final EIR.

- A map with roadways and land use designations and/or an aerial map should be included with the Final EIR so that receptor placement can be verified. The Final EIR should include CO hotspots analysis prepared according to the CO Protocol. For future reference, such maps should be included in the draft CEQA document.

- Table 5 of the Limited Air Quality Analysis presents a column labeled Long-Term CO Concentration. It is not clear what the long-term CO concentration represents or how it was derived. The table also includes a column labeled Total Long-Term + 8-hr Ambient CO, 8-hr ppm. It is not clear if these values are calculated correctly from the text. The correct equation would be the (1-hr CO modeled concentration x the persistence factor) + 8-hr CO background. Future 8-hr CO backgrounds can be

downloaded from the SCAQMD website at http://www.aqmd.gov/ceqa/handbook/CO/CO.html.

- The Draft EIR included CALINE4 output. The spatial location values are not presented correctly. The Y-values are presented as asterisks. In the future please include in the draft CEQA document both the input and output files with all values presented in a readable manner.

Localized Impacts:

Consistent with the SCAQMD's environmental justice program and policies, the SCAQMD recommends that the lead agency also evaluate localized air quality impacts. SCAQMD staff recommends that for this project and for future projects, the lead agency undertake the localized analysis to ensure that all feasible measures are implemented should the analysis demonstrate that construction NO_X and CO emissions are significant. The methodology for conducting the localized significance thresholds analysis can be found on the SCAQMD website at: www.aqmd.gov/ceqa/handbook/LST/LST.html.