



# South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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## **Mitigated Negative Declaration (MND) for the Proposed Murrieta's Hospitality Commons Project (DP 2016-1010 and Tentative Parcel Map 37091)**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comment is meant as guidance for the Lead Agency and should be incorporated into the Final MND.

### Project Description

The Lead Agency proposes to construct a new hotel with 105 rooms, three restaurants, and retail uses totaling 86,600 square feet on an approximately 6.47-acre site ("proposed project"). During the 45-day grading period, approximately 10,165 cubic yards (cy) of cut, 67,950 cy of fill, and 80,000 cy of soil import will occur. The soil import will require approximately 137 daily truck trips. Construction is expected to begin in 2017 and will take approximately 14 months to complete. The proposed project will be operational in 2018.

### Air Quality Analysis

Based on a review of the project description and aerial maps, SCAQMD staff found that the proposed project would be sited near existing sensitive land uses, including Murrieta Mesa High School to the northeast and a single-family residence to the southeast. However, the MND did not evaluate or disclose the potential localized air quality impacts that could result from the construction or operation of the proposed project. One of the basic purposes of CEQA is to inform governmental decision makers and the public about the potential, significant environmental effects of proposed activities (CEQA Guidelines Section 15002(a)(1)). A mitigated negative declaration is appropriate when the Lead Agency finds that the project will not have a significant effect on the environment after incorporating mitigation measures (CEQA Guidelines Sections 15070 to 15075). Reasons to support this finding shall be documented in the initial study. Without quantifying localized air emissions, the MND has not made that documentation which serves as substantial evidence to support a fair argument that the proposed project would not have any adverse effects on air quality. Therefore, SCAQMD staff recommends that the Lead Agency revise the air quality analysis to include an assessment of potential localized air quality impacts during the construction and operation of the proposed project in the Final MND.

SCAQMD staff recommends calculating localized air quality impacts and comparing the results to the SCAQMD's CEQA localized significance thresholds specific to the project area<sup>1</sup>. Guidance for performing a localized air quality analysis is available on the SCAQMD website<sup>2</sup>.

<sup>1</sup> South Coast Air Quality Management District. The Localized Significance Threshold (LST) methodology and Mass Rate LST Look Up Table. Accessed at: <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>.

<sup>2</sup> Ibid.

In the event that the Lead Agency finds, after revising the air quality analysis, that the proposed project would result in significant localized construction impacts, SCAQMD staff recommends that the Lead Agency require mitigation measures in accordance with the CEQA Guidelines Section 15126.4(a). For more information on construction-related air quality mitigation measures as guidance to the Lead Agency, please visit SCAQMD's CEQA Air Quality Handbook website<sup>3</sup>.

Pursuant to the CEQA Guidelines Section 15074, prior to approving the proposed project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. SCAQMD staff is available to work with the Lead Agency to address any questions that may arise from this comment letter. Please contact Gordon Mize, Air Quality Specialist, CEQA IGR Section, at (909) 396-3302, if you have any questions.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.  
Program Supervisor, CEQA IGR  
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<sup>3</sup> South Coast Air Quality Management District. CEQA. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.