



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) for the Proposed Lennar Residential Project (Planning Application 12-0364)

The South Coast Air Quality Management District (SCAQMD) staff 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 Lead Agency proposes the construction of 67 single-family residences, a private park, detention and water quality basins, and allow for open space on a 24-acre site. The project will take approximately 15 months to complete starting in 2013. In the Air Quality Section, the Lead Agency quantified the project's construction and operation air quality impacts and has compared those impacts with the SCAQMD's recommended regional and localized daily significance thresholds.

Based on the proximity of the prospective residential units to the nearby Interstate 15 Freeway, the proposed project could increase the number of residential units to be placed in close proximity to that freeway that currently carries up to 126,000 vehicles per day. As a result, these sensitive land uses could be exposed to a significant source of toxic emissions. On page 42, the Lead Agency mentions the 500 foot buffer recommended by the California Air Resources Board's (CARB) Land Use and Air Quality Handbook (CARB Handbook) that offers guidance for siting sensitive receptors near sources of air toxics. Based on the Lead Agency's own estimate and an aerial map inspection, the nearest residence would be approximately 485 feet from the I-15 Freeway. The Lead Agency then addressed this potential impact by performing a screening evaluation for cancer risks that is not consistent with SCAQMD's recommended CEQA significance threshold for Maximum Incremental Cancer Risk (MICR): 10 in 1 million or greater lifetime probability of contracting cancer. Specifically, the Lead Agency selected a cancer risk threshold of 276 per one million¹ that is based on Sacramento Metropolitan Air Quality Management District's (SMAQMD) Roadway Protocol Guidance. Because

¹ This screening criteria is based on the SMAQMD's Recommended Protocol for Evaluating the Location of Sensitive Land Uses Adjacent to Major Roadways available at:
<http://www.airquality.org/ceqa/RoadwayProtocol.shtml>.

the Draft MND analysis relies on screening criteria from Sacramento area meteorology and roadway configurations, its application to the project area is unclear. The SCAQMD staff recommends that the Final MND either provide, or commit to providing in future CEQA documents, project and site specific air quality data to demonstrate the project's health risk impacts. Therefore, in the absence of other substantial evidence, the SCAQMD staff recommends that the Lead Agency revise the Draft MND to include a Health Risk Assessment (HRA) consistent with the SCAQMD's recommended methodology² and applicable CEQA significance of threshold of 10 in 1 million or greater for MICR. Detailed information regarding the SCAQMD's CEQA Significance threshold for cancer risk impacts is available at: <http://www.aqmd.gov/ceqa/hdbk.html>. If upon revision of the Draft MND the HRA demonstrates significant health risk impacts the Lead Agency should provide mitigation pursuant to Section 15126.4 of the CEQA Guidelines.

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. The SCAQMD staff is available to work with the 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,



Edward A. Eckerle
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EE:GM

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² The SCAQMD Mobile Source HRA Guidance is available at:
http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html.