



South Coast Air Quality Management District

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Review of the Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) for the Proposed GPA-013-159; ZC-013-160; and TTM-014-300 (TTM-36659)

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.

In the project description, the Lead Agency proposes construction of a 52 single-family lot residential project with a park on a 9.28 acre site. The proposed project will also include approximately 62,500 cubic yards of cut and 8,900 cubic yards of fill with about 53,600 cubic yards of soil export from the site. The project is estimated to take approximately 1-1 ½ years to complete with construction beginning in 2014.

In the Draft IS/MND, the Lead Agency notes that the proposed residences will be sited near the Route 15/215 freeway junction. These residences would be approximately 200 feet east of these freeways,¹ of which Route 15 has an average daily traffic volume of 187,000 vehicles. Because of the close proximity to the existing freeway, residences could be exposed to pollutants due to existing ambient air pollution in the vicinity. The SCAQMD staff therefore recommends that the Lead Agency conduct a health risk assessment (HRA) to determine the potential risk to the residences from vehicles that use the freeway including diesel-fueled vehicles that emit diesel particulate matter, which the California Air Resources Board (CARB) has determined to be carcinogenic.

Numerous health studies have demonstrated the potential adverse health effects of living near highly travelled roadways. As a result of these studies, the California Air Resources Board recommended in 2005 avoiding the siting of housing within 500 feet of a freeway in their Land Use Handbook.² Since the time of that study, additional research has continued to build the case that the near roadway environment also contains elevated levels of many pollutants that

¹ Aerial map inspection.

² California Air Resources Board. April 2005. "Air Quality and Land Use Handbook: A Community Health Perspective." Accessed at: <http://www.arb.ca.gov/ch/landuse.htm>

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adversely affect human health, including some pollutants that are unregulated (e.g., ultrafine particles) and whose potential health effects are still emerging.³

While the health science behind recommendations against placing new homes close to freeways is clear, SCAQMD staff recognizes the many factors lead agencies must consider when siting new housing. Further, many mitigation measures have been proposed for other projects to reduce exposure, including building filtration systems, sound walls, vegetation barriers, etc. However, because of the potential health risks involved it is critical that any proposed mitigation must be carefully evaluated prior to determining if those health risks would be brought below recognized significance thresholds.

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 Lead Agency 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,

Jillian Baker

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³ See Chapter 9 of the 2012 AQMP for further information (<http://www.aqmd.gov/aqmp/2012aqmp/Final-February2013/Ch9.pdf>)