



South Coast Air Quality Management District

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January 19, 2016

Mr. Matthew C. Bassi, Director
Planning Department
City of Wildomar
23873 Clinton Keith Road, Suite 201
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Draft Environmental Impact Report (DEIR)
for the Proposed Baxter Village Mixed-Use Project
(PA 14-0002) (SCH No. 2014121047)

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 into the Final CEQA document.

The Lead Agency proposes a mixed-use development on an approximately 36-acre site. The uses would include three basic components: 1) 75,000 square feet of commercial uses (retail and restaurant); 2) 204 apartment units; and 3) 66-single family units. Grading activities will include 723,422 cubic yards of earthwork including import of approximately 142,652 cubic yards of soil resulting in approximately 15,850 total trips to import the soil to the project site. Construction is proposed to occur in phases over a 2-3 year period starting in late 2016.

In the Air Quality Analysis, the Lead Agency analyzed project regional and localized significance threshold emission impacts for construction and operational activities finding that these impacts were less than significant with mitigation when compared with the applicable SCAQMD thresholds of significance. In addition, a screening level Health Risk Assessment (HRA) was conducted to determine risk to future residents from the traffic operating on the Interstate 15 Freeway (I-15 Freeway) located just east of the project site. Based on the risk estimates in the HRA, the estimated mitigated Maximum Incremental Cancer Risk (MICR) to future residents would be 7.81 in one million, which is less than the SCAQMD significance threshold of ten in one million. Even though the cancer risk for future residents was estimated as being less than significant, the Lead Agency has proposed implementation of air filtration systems for the proposed apartments and single-family residents. The SCAQMD staff recognizes the Lead Agency's proposed installation of the proposed MERV filters but has concerns that the filters have limits, and since most of the future residents will be sited less than 500 feet from the adjacent I-15 Freeway, the SCAQMD staff further reiterates concerns related to

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the California Air Resources Board (CARB) guidance regarding siting sensitive receptors near freeways. Further details are included in the appendix.

Pursuant to Public Resources Code Section 21092.5, SCAQMD staff requests that the Lead Agency provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, 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 the enclosed comments.

Sincerely,

Jillian Wong

Jillian Wong, Ph.D.
Program Supervisor
Planning, Rule Development & Area Sources

Attachment

JW:JC:GM

RVC160105-01
Control Number

Limitations to Using Filters as Mitigation

1. In the HRA, cancer risk to future sensitive receptors (single- and multi-family residences) from freeway traffic was estimated to be below the SCAQMD significance threshold. The Lead Agency, however, has proposed a filtered air supply system for all residential homes that will include high-efficiency filters with a MERV of 14 for the people living in the apartment units and MERV 8 for those living in the single-family residential units.

The SCAQMD reminds the Lead Agency that the use of the proposed air filters has limitations. The filters have no ability to filter out any toxic gasses from vehicle exhaust and residents will not be protected outside of their homes, whether relaxing outside in their yard, playing in a common area, washing a vehicle or when the windows or doors are open. Further, the heating, ventilation and air conditioning (HVAC) system and as well as the filters have to be serviced/replaced as required by manufacturer recommendations with annual replacement costs expected to range from \$120 to \$240 to replace each filter.¹ Adequate pressure must also be maintained within the residences and it is assumed that the filters will operate 100 percent of the time while residents are indoors.

CARB Land Use Guidance for Sensitive Receptors Located Near Freeways

2. Based on the California Air Resources Board's (CARB) Land Use and Air Quality Handbook (CARB Handbook), guidance is included for siting sensitive receptors near sources of air toxics including exposure to residents from diesel fueled vehicles operating on the nearby freeway. Based on the project description, the DEIR shows that future residents (sensitive receptors) would be sited within the recommended 500-foot buffer.²

This would include siting the proposed residences near the I-15 Freeway that has a peak monthly daily traffic volume of 131,000 vehicles including approximately 11,397 daily trucks.³ As a result, future residents will be exposed to a significant source of toxic emissions. Numerous past health studies have demonstrated the potential adverse health effects of living near a freeway or highly travelled roads. 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 adversely affect human health,

¹ <http://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf?sfvrsn=0> . This study evaluated filters rated MERV 13+ while the proposed mitigation calls for less effective MERV 12 or better filters. See also CARB link for the "Status of Research on Potential Mitigation Concepts to Reduce Exposure to Nearby Traffic Pollution" (August 23, 2012):

http://www.arb.ca.gov/db/search/google_result.htm?q=Potential+Mitigation+Concepts&which=arb_google&cx=006180681887686055858%3Abew1c4wl8hc&srch_words=&cof=FORID%3A11

² CARB Handbook link: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/california-air-resources-board-air-quality-and-land-use-handbook-a-community-health-perspective.pdf?sfvrsn=0> .

³ <http://traffic-counts.dot.ca.gov/> 2014 Traffic and Truck Volumes: 1) Traffic Volume, I-15 Freeway at Chapman Avenue, 131,000 vehicles per day based on the peak month ADT, which is the average daily traffic for the month of heaviest traffic flow; 2) Truck Percentage of Total Vehicles is 8.7 % or 11,397 trucks per day. The monthly traffic total was used instead of the annual average daily traffic figure because it represents a more conservative, worst-case scenario.

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

While the health science behind recommendations against placing new residences close to freeways is clear, SCAQMD staff recognizes the many factors Lead Agencies must consider when siting new housing. Further, many strategies have been proposed for other projects to reduce exposure, including building filtration systems (as proposed in the DEIR), sound walls, vegetation barriers, etc. However, because exposure to roadway dust, vehicle emissions and potential adverse health risks might be involved, it is critical that any proposed strategy, whether proposed as mitigation for CEQA purposes or otherwise must be carefully evaluated prior to determining the ultimate impacts to future residents in order to reduce their exposure from criteria pollutants and adverse health impacts from impacts including roadway dust, diesel particulate matter, etc., coming from vehicles operating on the nearby freeway.