



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

November 14, 2019

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Mitigated Negative Declaration (MND) for the Proposed Citrus Oak Residential Subdivision Project

South Coast Air Quality Management District (South Coast AQMD) 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 MND.

South Coast AQMD Staff's Summary of Project Description

The Lead Agency proposes to construct 31 detached two-story residential units on a 4.2-acre vacant site (Proposed Project). Construction of the Proposed Project is expected to begin in April 2020, and operation of the Proposed Project is expected in January 2022¹. Upon review of Figure 4: *Aerial View of Project and Surrounding Areas*, in the MND² and aerial photographs, South Coast AQMD staff found that the Proposed Project is located within 50 feet of Interstate 210 (I-210).

South Coast AQMD Staff's Summary of the Air Quality and Health Risk Assessment (HRA) Analyses

In the Air Quality Analysis Section, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared those emissions to South Coast AQMD's recommended regional and localized CEQA air quality significance thresholds. Based on the analysis, the Lead Agency found that the Proposed Project's regional construction and operational air quality impacts would be less than significant³. Additionally, since the Proposed Project will be located in close proximity to I-210, sensitive receptors living at the Proposed Project would be exposed to diesel particulate matter (DPM) from diesel fueled, heavy-duty trucks passing by on I-210. DPM has been identified by the California Air Resources Board (CARB) as a toxic air contaminant (TAC) based on its carcinogenic effects⁴. To foster informed decision-making and public disclosure on the potential long-term health risk to sensitive receptors who will live at the Proposed Project, the Lead Agency prepared a mobile source Health Risk Assessment (HRA). The Lead Agency analyzed the potential cancer risk at a 70-year (lifetime), 30-year, and 9-year exposure scenario⁵. Based on this analysis, the Lead Agency found that the Proposed Project would result in cancer risk of 5.94 in one million for the 70-year exposure scenario, 5.0 in one million for the 30-year exposure scenario, and 3.60 in one million for the 9-year exposure scenario⁶, all of which would not exceed South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk⁷.

¹ MND. Page 3.

² MND. Page 9.

³ MND. Pages 24 through 33.

⁴ California Air Resources Board. August 27, 1998. Resolution 98-35. Accessed at: <http://www.arb.ca.gov/regact/diesltac/diesltac.htm>.

⁵ MND. Page 35 through 37.

⁶ *Ibid.*

⁷ South Coast AQMD has developed the CEQA significance threshold of 10 in one million for cancer risk. When South Coast AQMD acts as the Lead Agency, South Coast AQMD staff conducts a HRA, compares the maximum cancer risk to the threshold of 10 in one million to determine the level of significance for health risk impacts, and identifies mitigation measures if the risk is found to be significant.

Guidance Regarding Residences Sited Near a High-Volume Freeway or Other Sources of Air Pollution

South Coast AQMD staff recognizes that there are many factors Lead Agencies must consider when making local planning and land use decisions. To facilitate stronger collaboration between Lead Agencies and South Coast AQMD to reduce community exposure to source-specific and cumulative air pollution impacts, South Coast AQMD adopted the Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning in 2005. This Guidance Document provides suggested policies that local governments can use in their General Plans or through local planning to prevent or reduce potential air pollution impacts and protect public health. This Guidance Document is available on South Coast AQMD's website at: <http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf>. Additional guidance on siting incompatible land uses (such as placing residential uses near freeways) can be found in the CARB's *Air Quality and Land Use Handbook: A Community Health Perspective*, which is available at: <http://www.arb.ca.gov/ch/handbook.pdf>. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. Guidance on strategies to reduce air pollution exposure near high-volume roadways can be found at: https://www.arb.ca.gov/ch/rd_technical_advisory_final.PDF. South Coast AQMD staff recommends that the Lead Agency review the Guidance when making local planning and land use decisions.

Health Risk Reduction Strategies

The Proposed Project will site future residents in close proximity to I-210, where, in 2016, had 21,968 annual average daily truck trips⁸. Since future residents at the Proposed Project would be exposed to DPM from the mobile sources traveling on I-210 (e.g., diesel fueled, heavy-duty trucks), South Coast AQMD staff recommends that the Lead Agency consider the following health risk reduction strategies when making local planning and land use decisions.

Many strategies are available to reduce exposure, including, but not limited to, building filtration systems with Minimum Efficiency Reporting Value (MERV) 13 or better, or in some cases, MERV 15 or better is recommended; building design, orientation, location; vegetation barriers or landscaping screening, etc. Enhanced filtration units are capable of reducing exposures. Installation of enhanced filtration units can be verified during occupancy inspection prior to the issuance of an occupancy permit.

Enhanced filtration units have limitations. In a study that South Coast AQMD conducted to investigate filters⁹, a cost burden is expected to be within the range of \$120 to \$240 per year to replace each filter. The initial start-up cost could substantially increase if an HVAC system needs to be installed. In addition, because the filters would not have any effectiveness unless the HVAC system is running, there may be increased energy costs. It is typically assumed that the filters operate 100 percent of the time while sensitive receptors are indoors, and the environmental analysis does not generally account for the times when sensitive receptors have windows or doors open or are in common space areas of a project. Moreover, these filters have no ability to filter out any toxic gases from vehicle exhaust. Therefore, the presumed effectiveness and feasibility of any filtration units should be carefully evaluated in more detail and disclosed to prospective residences prior to assuming that they will sufficiently alleviate exposures to TACs including DPM emissions.

Because of the limitations, to ensure that enhanced filters are enforceable throughout the lifetime of the Proposed Project and effective in reducing exposures to DPM emissions, South Coast AQMD staff recommends that the Lead Agency make the installation of enhanced filtration units a project design feature, mitigation measure, or condition of approval, and provide additional details regarding the ongoing, regular

⁸ California Department of Transportation. 2016. *Truck Traffic: Annual Average Daily Truck Traffic*. Accessed at: <https://dot.ca.gov/-/media/dot-media/programs/traffic-operations/documents/f0017681-2016-aadt-truck-a11y.pdf>

⁹ This study evaluated filters rated MERV 13 or better. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf>. Also see 2012 Peer Review Journal article by South Coast AQMD: <http://d7.iqair.com/sites/default/files/pdf/Polidori-et-al-2012.pdf>.

maintenance, and monitoring of filters in the Final MND. To facilitate a good-faith effort at full disclosure and provide useful information to future residents living at the Proposed Project, at a minimum, the Final MND should include the following information:

- a) Disclose potential health impacts to residents from living in close proximity to I-210 and the reduced effectiveness of air filtration systems when windows are open and/or when residents are outdoor;
- b) Identify the responsible implementing and enforcement agency, such as the Lead Agency and/or the Home Owners Association (HOA)¹⁰ to ensure that enhanced filtration units are installed on-site at the Proposed Project before a permit of occupancy is issued;
- c) Identify the responsible implementing and enforcement agency such as the Lead Agency's building and safety inspection unit to ensure that enhanced filtration units are inspected and maintained regularly;
- d) Disclose the potential increase in energy costs for running the HVAC system with enhanced filtration units;
- e) Provide information to residents living at the Proposed Project and the HOA of the Proposed Project on where enhanced filtration units can be purchased;
- f) Provide recommended schedules (e.g., every year or every six months) for replacing the enhanced filtration units to residents living at the Proposed Project;
- g) Identify the responsible entity (e.g. residents and/or the HOA) for ensuring enhanced filtration units are replaced on time, if appropriate and feasible (if the building operator/residents are responsible for the periodic and regular purchase and replacement of the enhanced filtration units, the Lead Agency should include this information in the disclosure form);
- h) Identify, provide, and disclose ongoing cost-sharing strategies, if any, for replacing the enhanced filtration units;
- i) Set City-wide or project-specific criteria for assessing progress in installing and replacing the enhanced filtration units; and
- j) Develop a City-wide or project-specific process for evaluating the effectiveness of the enhanced filtration units.

Conclusion

Pursuant to 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. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, responses should provide sufficient details giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and the public who are interested in the Proposed Project.

¹⁰ MND. Page 2.

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November 14, 2019

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Margaret Isied, Assistant Air Quality Specialist, at misied@aqmd.gov or (909) 396-2543, should you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS:MI

LAC191106-02

Control Number