



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA USPS AND E-MAIL:
MCarnahan@ci.claremont.ca.us

April 14, 2015

Mr. Mark Carnahan, Senior Planner
Planning Division
City of Claremont
207 Harvard Avenue
Claremont, CA 91711

Revised Draft Initial Study/Mitigated Negative Declaration (Revised DMND) for the Proposed Serrano II Residential Project

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. Although SCAQMD staff did not provide comments for the original DMND during its previous public comment period, SCAQMD staff would like to submit comments now since the entire document has been recirculated for public review. Therefore, the following comments are meant as guidance for the Lead Agency and should be incorporated into the Final Revised Mitigated Negative Declaration.

Project Description and Surrounding Land Uses

The Lead Agency proposes demolition of the some existing buildings, storage/office structures and pavement. 40 detached residential condominium units would then be built on an approximately 3.59 acre lot. In addition, soil disturbance of approximately 3,000 cubic yards of soil export would be required. Surrounding land uses include residences to the north, commercial-office uses to the east, residences to the west, and the State Route 210 Freeway (SR-210) to the north. Construction is estimated to be completed in one phase over a 16-month period.

Siting of Sensitive Receptors Near a Freeway and Associated Cancer Risks

In the Draft MND, the Lead Agency notes that the proposed residences will be sited near SR-210 Freeway that has an average daily traffic volume of 165,000 vehicles¹ including approximately 5,280 of these vehicles that will be diesel trucks². 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

¹ <http://traffic-counts.dot.ca.gov/2012all/Route198-220.html>

² SR-210 Freeway Average Daily Traffic at Towne Ave: 165,000 X 0.032 Heavy Duty Diesel Trucks (Page B-15, HRA) = 5,280

levels of many pollutants that adversely affect human health, including some pollutants that are unregulated (e.g., ultrafine particles) and whose potential health effects are still emerging.³ Based on the Lead Agency's estimated cancer risk, project residents would be exposed to a Maximum Incremental Cancer Risk (MICR) of 43 in one million that substantially exceeds the SCAQMD significance threshold of 10 in one million. With mitigation, the Lead Agency estimates less than significant cancer risk of 8.3 in one million.

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.

On page 49, 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. Although this recommended guidance is discussed, the DMND shows that residents would still be sited within the recommended 500-foot buffer. Rather, the Lead Agency proposes mitigation to reduce adverse health effect impacts starting on Page 51 that includes fitting Heating, Ventilation, and Air Conditioning (HVAC) units with air filters with a Maximum Efficiency Rating Value (MERV) of 12 or better.

Limitations to the Effectiveness of Filters as Mitigation

Using these proposed air filters as mitigation has limitations. It should be noted that these filters have no ability to filter out any toxic gasses from vehicle exhaust and residents will not be protected outside of their homes while relaxing outside, 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 filter⁴. Adequate

³ See Chapter 9 of the 2012 AQMP for further information Accessed at: [http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2012-air-quality-management-plan/final-2012-aqmp-\(february-2013\)/chapter-9-final-2012.pdf](http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2012-air-quality-management-plan/final-2012-aqmp-(february-2013)/chapter-9-final-2012.pdf)

⁴ <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/search_result.htm?q=Potential+Mitigation+Concepts+to+Reduce+Exposure+to+Nearby+Traffic+Pollution&which=arb_google&cx=006180681887686055858%3Abew1c4wl8hc&srch_words=&cof=FORID%3A11 .

Mr. Mark Carnahan,
Senior Planner

3

April 14, 2015

pressure must also be within the residences and it is assumed that the filters will operate 100 percent of the time while residents are indoors.

Finally, SCAQMD staff has concerns about the assumptions made in the HRA analysis that are included in the attachment.

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final CEQA document. The SCAQMD staff is available to work with the Lead Agency to address these issues and any other air quality 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 Wong

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

Attachment

JW:GM

LAC150317-03
Control Number

HRA Analysis

1. The breathing rates used are not consistent with OEHHA's new guidance using the different age bins. Instead, the breathing rates used reference a method used by the BAAQMD. The proposed project is located in the South Coast air basin and therefore should follow the SCAQMD for estimating health risks, which is consistent with the OEHHA Guidelines. SCAQMD staff recommends the Lead Agency revise the HRA using the breathing rates recommended in the OEHHA Guidelines (include reference) in order to ensure that health risks are not underestimated.
2. The cancer risk was also calculated using one ASF value, which is not consistent with OEHHA's recommendation for the different age groups. It appears that the Lead Agency used a hybrid of both current and recent revised OEHHA guidance equations and factors in calculating the cancer risk and this was not well documented. SCAQMD staff recommends that the Lead Agency update the HRA with detailed explanation of the methods used to calculate the health risks as well as better define the factors used and how they were derived. Where applicable, the relevant SCAQMD references should be included.
3. In Risk Tables – Serrano II.xls Tables D1-D4 Weight Fraction (c) is not adequately reference. It is unclear where these values were derived. SCAQMD staff recommends providing additional details on origins of these values.