



South Coast Air Quality Management District

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

SENT VIA E-MAIL AND USPS:
dcasey@rialto.ca.gov

August 5, 2015

Mr. Daniel Casey, Associate Planner
Developmental Services Department, Planning Division
City of Rialto
150 South Palm Avenue
Rialto, CA 92376

Draft Mitigated Negative Declaration (Draft MND) for the Proposed Subdivision of a 5.37 Gross Acre Lot and Construction of 20 Single-Family Residences Project in the City of Rialto (EAR No. 14-75, SPA No. 2 to the Renaissance Specific Plan, Tentative Tract Map No. 19916)

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.

Project Description

The project site is approximately 6.52 acres in size. The Lead Agency proposes to subdivide approximately 5.37 gross acres of the property into 20 vacant, individual lots followed by construction of 20 single-family homes. Construction is planned to begin in 2016 with build-out occurring in 2017.

Health Risk Assessment

In the Draft MND, the Lead Agency has estimated less than significant health risk impacts with mitigation using a surrogate health risk assessment (HRA) prepared in 2011¹ for a property six miles west of the proposed project site that has similar freeway setbacks. In this analysis, it was concluded that the unmitigated cancer risk was 12.8 - 29.3 in one million, both of which would exceed the SCAQMD Maximum Incremental Cancer Risk (MICR) threshold of significance of greater than or equal to 10 in one million. In the Draft MND circulated for public review, the Lead Agency only circulated the HRA modeling output sheets in the air quality analysis, which did not allow for adequate SCAQMD staff review. In order to validate the modeling results, the model's electronic input files should also be available for review. Further, a more current version of the air dispersion model² should be used since the 2011 version of AERMOD used has

¹Page 19, Appendix A, Air Quality & Greenhouse Gas Impact Report (Giroux & Associates, April 1, 2015) for Rancho Cucamonga Parcel TTM 18122 Using the EPA, Atmospheric Dispersion Modeling System (AERMOD Version 11103, EPA Revision 4/13/2011).

²The Latest Version of AERMOD is Ver. 15181 (6/30/2015).

been subsequently revised six times. These revisions to the 2011 version of the modeling source code might increase the modeled concentrations, and the resulting estimated risk to the future residents might have been underestimated. Using a current version of the model is especially important since the air quality analysis concludes that the cancer risk is reduced with mitigation to a less than significant level (see comment below regarding home air filters). The actual risk assumptions and subsequent risk should be validated to provide substantial evidence to demonstrate the Lead Agency's findings that risk is less than significant with mitigation. The SCAQMD staff therefore recommends that the freeway traffic risk to future residents be re-evaluated using the most current version of AERMOD.

CARB Guidance for Siting Sensitive Receptors Near a Freeway

In the Draft MND, the Lead Agency states that the proposed project site's "southernmost boundary is slightly greater than 200 feet of the SR-210" (State Route 210 Freeway), which has an average daily traffic volume of 110,000 vehicles including approximately 16,940 trucks.³ Because of the close proximity to the existing freeway and associated diesel truck traffic, residents would be exposed to diesel particulate matter, which is a toxic air contaminant.

Because numerous health studies have demonstrated the potential adverse health effects of living near highly travelled roadways, the California Air Resources Board (CARB) recommends avoiding the siting of housing within 500 feet of a freeway in their Land Use Handbook.⁴ 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, including some pollutants that are unregulated (e.g., ultrafine particles) and whose potential health effects are still emerging.⁵

Limitations to the Effectiveness of Filters as Mitigation

Because of the potential significant impacts, the Lead Agency has proposed, as mitigation, a filtered air supply system for all residential homes that will include high-efficiency filters with a minimum efficiency reporting value (MERV) of 13⁶ concluding that the filtration would reduce impacts to a less than significant level.

The use of the proposed air filters as mitigation, however, 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

³Caltrans Traffic Census Programs: <http://www.dot.ca.gov/hq/traffops/census/> : 110,000 average daily traffic – 2014 data: SR-210 at Ayala Drive, Rialto; and 16,940 daily trucks - 2013 data, Westbound SR-210 at Riverside Avenue.

⁴California 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>

⁵See 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).

⁶Ibid, Table 9-1, Page 9-29.

replacement costs expected to range from \$120 to \$240 to replace each filter⁷. 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.

Compliance With SCAQMD Rule 1403 During Demolition/Renovation Activities

Besides estimating construction and operational air quality impacts, the Lead Agency should also describe compliance with SCAQMD Rule 1403 - Asbestos Emissions from Demolition/Renovation Activities due to the potential of discovering asbestos during the demolition activities described in the project description.

SCAQMD Staff Contact Information

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 Wong

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

SBC150721-05
Control Number

⁷ <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%3Abew1c4w18hc&srch_words=&cof=FORID%3A11