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:
cwong@westminster-ca.gov

December 18, 2014

Mr. Chris Wong, Assistant Planner
City of Westminster
Community Development Department
8200 Westminster Blvd.,
Westminster, CA 92683

Draft Mitigated Negative Declaration (Draft MND) for the Proposed Residential Development Located at 14260, 14292, 14302, and 14362 Willow Lane and 6411 Maple Ave., Westminster (Case No. 2014-69)

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 MND. In the project description, the Lead Agency proposes to demolish existing structures, grade 7.17 acres and construct 79 single family homes.

In the Draft MND, the Lead Agency notes that the proposed residences will be sited near the Route 405 freeway. These residences would be approximately 200 feet southwest of the freeway[1], of which Route 405 has an average daily traffic volume of 269,000 vehicles, which includes more than 9,200 diesel trucks. Because of the close proximity to the existing freeway, residents would be exposed to diesel particulate matter, which is a toxic air contaminant. The SCAQMD staff therefore recommends that the Lead Agency conduct a mobile source health risk assessment (HRA)[2] to disclose the potential health risks to the residents 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.[3] 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.[4]

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, sounds walls, vegetation barriers, etc. However, because of the potential

[1] Aerial map inspection.
[2] "Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis" Accessed at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis
[3] 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
[4] See Chapter 9 of the 2012 AQMP for further information Accessed at: http://www.aqmd.gov/aqmp/2012aqmp/Final-February2013/Ch9.pdf

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.

Limits to Enhanced Filtration Units

The lead agency should consider the limitations of the proposed mitigation for this project (enhanced filtration) on housing residents. For example, in a study that SCAQMD conducted to investigate filters[5] similar to those proposed for this project, costs were expected to range from $120 to $240 per year to replace each filter. In addition, because the filters would not have any effectiveness unless the HVAC system is running, there may be increased energy costs to the resident. The proposed mitigation assumes that the filters operate 100 percent of the time while residents are indoors. These filters also have no ability to filter out any toxic gasses from vehicle exhaust. The presumed effectiveness and feasibility of this mitigation should therefore be evaluated in more detail prior to assuming that it will sufficiently alleviate near roadway exposures.

Additionally, Appendix 8.1 assumes that 53,000 tons of material will be demolished and 241 haul trips will be required. It is unclear how these assumptions were calculated and the SCAQMD staff recommends that additional information be provided the Final MND.

Based on the historical use of the proposed project, the SCAQMD staff is concerned about the potential air quality impacts from VOC contaminated soils. Disturbing soils that may contain petroleum hydrocarbons are subject to the requirements of SCAQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil. Rule 1166 should be incorporated during the development of the Final MND.

Since the proposed project is adjacent to sensitive land uses (i.e., residential dwellings north and west of the project site), a localized air quality impact analysis is required. The Draft MND did not properly evaluate potential localized air quality impacts[6]. The Lead Agency determined that the Source Receptor Area (SRA) was "Central Orange County – SRA 17;" however, the project is located in "North Coastal Orange County – SRA 18." The SCAQMD staff recommends that the Lead Agency revise the Air Quality Analysis to correctly assess the potential localized air quality impacts during construction of the proposed project.

The SCAQMD staff is available to work with the Lead Agency to address these concerns and any other air quality questions that may arise. Please contact Jack Cheng, Air Quality Specialist at (909) 396-2448, if you have any questions regarding these comments. We look forward to reviewing and providing comments for the Final MND associated with this project.

Sincerely,

Jillian Baker

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

JB:JC
ORC 141204-11
Control Number

[5] This study evaluated filters rated MERV 13+ while the proposed mitigation calls for less effective MERV 12 or better filters. Accessed at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf?sfvrsn=0 .

[6] The Localized Significance Threshold (LST) methodology and Mass Rate LST Look Up Table Accessed at: http://www.aqmd.gov/ceqa/handbook/LST/LST.html