



South Coast Air Quality Management District

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Draft Mitigated Negative Declaration (Draft MND) for the Proposed Riverdale Anaheim Residential Project

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 Lead Agency proposes to demolish 14 existing structures totaling 44,600 square feet, approximately 142,000 square feet of pavement and ancillary infrastructure from the approximately 12.09-acre project site. This will result in approximately 7,492 tons of demolition debris that will result in approximately 741 haul trips to remove the debris from the project site. After demolition is completed, construction of 75 single-family homes will begin along with development of an 0.8-acre common landscape area and a 0.26-acre passive park. Grading would include 48,000 cubic yards (CY) of cut and 6,000 CY of fill. A total of approximately 5,250 haul trips will be required to remove 42,000 CY of soil offsite. Demolition is planned to begin in early 2016 with construction expected to be completed in Year 2017. Project buildout is scheduled in Year 2030.

Health Risk Assessment - Significant Impacts from Freeway Traffic

The SCAQMD staff is concerned that the Lead Agency has determined that project residents would be exposed to cancer risks of up to 79.3 in one million, which exceeds the SCAQMD Maximum Incremental Cancer Risk significance threshold of 10 in one million cases. The estimated risk comes from potential adverse health risk impacts from as many as 338,000 vehicles per day including 21,970 diesel fueled trucks¹ operating on the adjoining State Route 91 Freeway (SR-91 Freeway). The Lead Agency concluded that cancer risk from exposure to diesel fuel emissions that include diesel particulate matter, a Toxic Air Contaminant (TAC), is less than

¹Most Conservative Exposure - 2014 Traffic Volumes. California Department of Transportation: <http://traffic-counts.dot.ca.gov/> : Average Daily Traffic for the Month of Heaviest Traffic Flow (Back Peak Month) 338,000 vehicles; and 2014 Truck Traffic 0.065 Truck Percentage of Total Vehicles (0.065 X 338,000 = 21,970 daily trucks using diesel fuel).

significant when compared with the SCAQMD Chronic and Acute Hazard Index threshold of significance. For Maximum Incremental Cancer Risk (MICR), however, the Lead Agency did not use the recommended SCAQMD threshold of significance for projects located within the SCAQMD's jurisdiction, specifically the SCAQMD MICR threshold of 10 in one million. Since the Health Risk Assessment determined that cancer risks range as high as 79.3 in one million and mitigation was not included in the Draft MND, project cancer risks to future residents remain significant and unavoidable. The Lead Agency should therefore include feasible, fully enforceable mitigation measures in the Final CEQA document to reduce the health risks to a less than significant level. These measures should also be incorporated in any applicable air quality analysis demonstrating each measure's effectiveness to reduce significant cancer risk below the SCAQMD's approved MICR threshold level. Otherwise, the Lead Agency has not supported its findings with substantial evidence that cancer risks from the adjoining freeway traffic to future residents are less than significant.

Siting of Sensitive Receptors Near a Freeway

Based on the Site Plan, all project residences are within one-quarter mile² of the SR-91 Freeway. Because of the close proximity to the existing freeway, residents would be exposed to diesel particulate matter, which is a TAC. 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 (CARB) in 2005 recommended 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

Health Risk Assessment Analysis

In the Draft MND, some of the receptors were incorrectly placed within the volume source exclusion zone and their results would be invalid. Since large modeled volume sources were used, care should be taken to ensure that no receptors are placed within the volume source exclusion zone. SCAQMD staff recommends that the Lead Agency revise the HRA in the Final CEQA document by using smaller, adjacent volume sources or by using an area source instead to model the freeway emissions.

Asbestos Removal During Demolition

Based on the project description, asbestos may be encountered during the removal of the single-family-residence and other buildings currently occupying portions of the project site. The Final

² Aerial map measurement of approximately 1,135 feet from the northern project border to the SR-91 Freeway.

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/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).

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3

November 6, 2015

CEQA document should therefore include discussion on how the Lead Agency will comply with SCAQMD Rule 1403 – Asbestos Removal From Demolition/Renovation Activities.

Please provide the SCAQMD staff 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,

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