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Draft Mitigated Negative Declaration (DMND)
for the Proposed Olson Manchester Townhomes Project

The South Coast Air Quality Management District (SCAQMD) 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.

The Lead Agency proposes demolition of the existing 144-space Recreational Vehicle (RV) Park.[1] After the demolition is completed, construction of a 120-unit townhome community will begin. The proposed residential community will also include a recreational area and several smaller common areas on the approximately 5.5-acre site. The project would be constructed in approximately six phases starting in mid-2016 taking between 10 months and three years to complete, based on market conditions. In order to provide a more conservative, worst-case scenario, a 10-month construction period was used in the applicable air quality analyses.

In the Air Quality Analysis,[2] the Lead Agency analyzed project regional and localized significance threshold emission impacts for construction and operational activities[3] finding that these impacts were less than significant when compared with the applicable SCAQMD thresholds of significance. In addition, a Health Risk Assessment (HRA) was conducted[4] to determine risk to future residents from the traffic operating on the Interstate 5 Freeway (I-5 Freeway) that is located just east of the project site. Based on the risk estimates in the HRA, the estimated mitigated Maximum Incremental Cancer Risk (MICR) to future residents remains significant when compared with the applicable

[1] The Park was intended for occupancy for periods up to 30-days, DMND, Page 2-1.
[2] Appendix A, Air Quality, Greenhouse Gas Emissions and Health Risk Assessment Impact Analysis (Vista Environmental, October 29, 2105).
[3] The California Emissions Estimator Model (CalEEMod) was used to model short- and long-term regional and localized significance thresholds (LST).
[4] The Atmospheric Dispersion Modeling System AERMOD View Version 9.0.0 Model was used for all dispersion modeling. Appendix A: AQ, GHG Emissions & HRA Impacts, Page 37.

SCAQMD significance threshold.[5] Additional mitigation should therefore be incorporated into the proposed project description and included in the air quality analysis in order to demonstrate that the project impacts with mitigation are less than significant. The SCAQMD staff has further concerns based on the limits of the proposed MERV Filters along with the California Air Resources Board (CARB) guidance regarding siting sensitive receptors near freeways. Further details are included in the appendix.

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. SCAQMD staff is available to work with the Lead Agency to address these issues and any other air quality questions that may arise. If you have any questions concerning this letter, please contact Gordon Mize, Air Quality Specialist, at (909) 396-3302.

Sincerely,

Jillian Wong

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Attachment

JW:GM

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[5] 24.1 in one million, page 53 (AQ Analysis) compared with the SCAQMD MICR Threshold of 10 in one million cases.

Health Risk Assessment

1. Based on the HRA analysis, significant health impacts were estimated up to 120.5 per million cases for the future residents, which exceeds the SCAQMD recommended significance threshold of 10 in one million cases for Maximum Incremental Cancer Risk (MICR). With mitigation, the risk is estimated to be reduced to 24.1 in one million. The Lead Agency, however, based its significance determination using a threshold that is not used for projects sited within the jurisdiction of the SCAQMD. Therefore, MICR cancer risk remains significant when compared with the SCAQMD MICR threshold. In the Final MND, the Lead Agency should base its significance determination for MICR based on the SCAQMD threshold and revise the Final CEQA document, as needed.

Limitations to Using Filters as Mitigation

2. Because of the potential significant cancer risk to future residents from freeway traffic, 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 13 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 replacement costs expected to range from $120 to $240 to replace each filter.[6] 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.

CARB Land Use Guidance for Sensitive Receptors Located Near Freeways

3. Based on the California Air Resources Board's (CARB) Land Use and Air Quality Handbook (CARB Handbook), guidance is included for siting sensitive receptors near sources of air toxics including exposure to residents from diesel fueled vehicles operating on the nearby freeway. Based on the project description, the DMND shows that future residents (sensitive receptors) would be sited within the recommended 500-foot buffer.[7]

   This would include siting the proposed residences near the I-5 Freeway that has a peak monthly daily traffic volume of 303,000 vehicles including approximately 21,210 daily

[6] 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%3Abew1c4wl8hc&srch_words=&cof=FORID%3A11

[7] CARB Handbook link: http://www.aqmd.gov/docs/default-source/ceqa/handbook/california-air-resources-board-air-quality-and-land-use-handbook-a-community-health-perspective.pdf?sfvrsn=0 .

trucks.[8] 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 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.

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 potential adverse health risks might be involved, it is critical that any proposed mitigation must be carefully evaluated prior to determining if the health risks would be brought below recognized significance thresholds.

[8] http://traffic-counts.dot.ca.gov/ 2014 Traffic and Truck Volumes: 1) Traffic Volume, I-5 Freeway at Chapman Avenue, 303,000 vehicles per day based on the peak month ADT, which is the average daily traffic for the month of heaviest traffic flow; 2) Truck Percentage of Total Vehicles is 7 % or 21,210 trucks per day. The monthly traffic total was used instead of the annual average daily traffic figure because it represents a more conservative, worst-case scenario.