



South Coast Air Quality Management District

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Draft Mitigated Negative Declaration (Draft MND) for the Proposed Clarendon Street Apartments Development 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 MND.

The Lead Agency proposes to demolish the existing structure and develop an apartment complex with 335 residential units. The proposed residences will be sited immediately south of the 101 Freeway, which has an average daily traffic volume of 263,000 vehicles and that includes more than 10,627 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 and a carcinogen. The SCAQMD staff therefore recommends that the Lead Agency conduct a mobile source health risk assessment (HRA)¹ to disclose the potential health risks to the residents from vehicles that use the freeway including diesel-fueled vehicles that emit diesel particulate matter

Numerous health studies have demonstrated potential adverse health effects associated with living near highly travelled roadways. As a result of these studies, the California Air Resources Board (CARB) developed a Land Use Handbook² that recommends avoiding the siting of housing within 500 feet of a freeway. Additional research has shown 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 emerging³.

In the Air Quality Analysis and Health Risk Assessment, the Lead Agency determined that with the use of MERV level 16 filtration throughout the Project, health risks to sensitive receptors will be mitigated to a level that is less than significant. While the health science behind recommending against placing new homes in close proximity to freeways is clear, SCAQMD staff recognizes that there are 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 sound walls, vegetation barriers, etc. However, because of the potential adverse health risks involved with siting housing near a freeway, it is essential that

¹ "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>

² 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>

³ See Chapter 9 of the 2012 AQMP for further information. Accessed at: <http://www.aqmd.gov/aqmp/2012aqmp/Final-February2013/Ch9.pdf>

any proposed mitigation must be carefully evaluated in order to determine 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 filters⁴ 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 and does not account for the times when the residents have their windows or doors open or are in common space areas of the project. These filters also have no ability to filter out any toxic gases 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.

Compliance With SCAQMD Rules

The project includes demolition, so the Lead Agency should discuss and provide additional information regarding compliance with SCAQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities in the Final MND. In the event that soils containing hydrocarbons are encountered during soil disturbance activities, that portion of the proposed project will be subject to the requirements of SCAQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil. The Final MND should also include how the Lead Agency will comply with Rule 1166.

Finally, in the Air Quality analysis, the Lead Agency states that low-VOC paint (150 g/L for non-flat coatings) will be used for this project. Current SCAQMD Rule 1113 limits non-flat coatings to 50 g/L. SCAQMD staff recommends that the Air Quality Analysis be re-analyzed using the appropriate VOC limits.

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,

Barbara Radlein

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⁴ 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>