



South Coast
Air Quality Management District

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Ms. Amber Gregg, Associate Planner
City of San Clemente
Community Development Agency
910 Calle Negocio
San Clemente, CA 92673

Draft Environmental Impact Report (Draft EIR) for the Proposed San Clemente Senior Apartment Complex

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 Environmental Impact Report prior to approval of the proposed project.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. The SCAQMD staff would be happy 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,

Steve Smith, Ph.D.
Program Supervisor
Planning, Rule Development & Area Sources

Attachment

SS:GM

ORC080916-04
Control Number

Siting of Sensitive Land Uses Near Freeways and High Traffic Roads

1. Review of the SCAQMD's intergovernmental review (IGR) logging system indicates that the SCAQMD has no record of receiving the Notice of Preparation/Initial Study (NOP/IS) for the proposed project. As a result, SCAQMD staff did not have the opportunity to review the air quality analysis. Based on staff's review of the air quality analysis in the IS in Appendix A, it is not clear whether or not the analysis took into consideration cut-in-fill operations associated with excavating the subterranean parking lot and leveling the project site.
2. The California Environmental Protection Agency (CAL/EPA) and the California Air Resources Board (CARB) have published the "Air Quality and Land Use Handbook: A Community Health Perspective (April 2005)" (Handbook), which is available at the following website: <http://www.arb.ca.gov/ch/landuse.htm>. This document includes recommendations when siting projects that include sensitive land uses (schools, residences, playgrounds, convalescent centers, nursing homes, long-term health care facilities, etc.) close to high traffic corridors because of the associated mobile source emissions that may lead to adverse health effects beyond those associated with regional air pollution in urban areas. The Handbook is based on a number of health studies and states, in part that there is an association "between residential proximity to high traffic roadways and a variety of respiratory symptoms, asthma exacerbations, and decreases in lung function in children." Other effects associated with traffic emissions according to the Handbook include "premature death in elderly individuals with heart disease." Based on findings of the CAL/EPA and CARB Air Quality and Land Use Handbook, the following advisory recommendation is made:

Recommendation:

- Avoid siting new sensitive land uses within 500 feet away from a freeway, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day.

Alternatively, the lead agency could perform a health risk assessment to determine if cancer risks from the I-5 freeway on the proposed project are less than 10 in one million (10×10^{-6}) above the ambient cancer risk identified for the area in the SCAQMD Multiple Air Toxics Exposure Study (MATES) III (see comment #4). Given the location of the proposed project site, it is unlikely that a 500-foot buffer zone between the proposed project and the I-5 freeway can be included. Another option, therefore, is to consider an alternative location (CEQA Guidelines § 15126.6(f)(2)(A)). If no feasible alternatives for the proposed project exist, the lead agency "must include the reasons for this conclusion, and should include the reasons in the EIR (CEQA Guidelines § 15126.6(f)(2)(B)).

Health Risk Assessment

3. According to the Draft EIR on page 2-3, a gasoline service station is located directly east of the proposed site. SCAQMD staff performed a brief analysis of cancer risk

from the fueling activities at the gasoline service station located directly east of the proposed site to the potential residents at the senior apartment complex. The analysis concluded that the risk to the residents from the service station fueling activities was found to be approximately 2.42 in one million (2.42×10^{-6}). This risk would be in addition to the background risk from the freeway vehicle emissions including diesel trucks that would pass by the proposed site 24-hours per day seven days per week. Cancer risk impact to the proposed facility from the I-5 freeway and the adjacent gas station should be assessed.

4. If a lead agency chooses to site new sensitive land uses within the buffer zones recommend by the CARB Air Quality and Land Use Handbook, SCAQMD staff suggests that the lead agency report the MATESIII carcinogenic health risk associated with the two kilometer by two kilometer grid cell that includes the proposed project in the Final EIR. The MATESIII health risk value also includes carcinogenic health risks from other upwind sources besides the freeway, which were left out when only the freeway is modeled.

The MATESIII carcinogenic health risk value for the two kilometer by two kilometer grid cell that includes the proposed project is 407 in one million. Since the source to receptor distance is important in determining health risk and the MATESIII carcinogenic health risk values represent an average health risk in the associate grid cell, even this value may underestimate the carcinogenic health risk to the proposed project, which provides an additional rational for performing a health risk assessment of the freeway and gas station to determine cancer risk impacts at the proposed project site.