



South Coast Air Quality Management District

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December 11, 2012

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City of Claremont
207 Harvard Avenue
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Draft Mitigated Negative Declaration (Draft MND) for the Proposed D.R. Horton 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 Mitigated Negative Declaration. AQMD staff appreciates the lead agency's willingness to discuss AQMD staff concerns about this project, including in a recent conference call.

In the Draft Mitigated Negative Declaration's (Draft MND) project description, the lead agency proposes to construct 54 single-family detached residences on a 14.21-acre site. Construction would last approximately 10 months beginning in mid-2013. All earth work would be balanced on-site. The AQMD staff is concerned that the site of the proposed sensitive land use is located in a traditionally incompatible setting with the existing freeway adjacent to the project site. On page 33 of the Draft MND, the lead agency cites the CARB Air Quality and Land Use Handbook recommendation to avoid siting new sensitive land uses within 500 feet of a freeway. In spite of this recommendation, the Draft MND states that the proposed project would be less than 100 feet from a freeway. While a Health Risk Assessment was conducted for this site, it is unclear to AQMD staff that the technical analysis and proposed mitigation as described in the Draft MND adequately assess and address the unmitigated significant impact.

Please provide the AQMD 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 air quality 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.

Mr. Marc Carnahan,
Senior Planner

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Sincerely,

A handwritten signature in black ink that reads "Ian V. MacMillan". The signature is written in a cursive style with a large initial "I" and "M".

Ian MacMillan
Program Supervisor, Inter-Governmental Review
Planning, Rule Development & Area Sources

Attachment

IM:GM

LAC121106-06
Control Number

Health Risk Assessment and Siting of an Incompatible Land Use

In the air quality analysis, the lead agency has determined that the unmitigated incremental cancer risk is significant for future project residents from traffic emissions coming from the 210 freeway (SR-210) located less than 100 feet south of the proposed project site. The lead agency's Health Risk Assessment (HRA) determined that for a lifetime exposure, project residents would be exposed to a cancer risk of 13 in one million (13×10^{-6}), which exceeds the recommended significance threshold of 10 in one million (10×10^{-6}). To minimize the cancer risk, the lead agency has proposed mitigation measures including requiring an air intake design that would locate filtered (MERV 9) heating, air conditioning and ventilation systems north and west of the buildings away from the freeway. With implementation of the proposed measures, the lead agency has concluded that cancer risk impacts to future residential occupants would be less than significant. However, it is not clear to AQMD staff that the proposed mitigation will be sufficient to reduce health impacts to residents.

The reported 45% efficiency of MERV 9 filters is based on the dust spot efficiency reported in the appendix to the HRA. The appendix shows that MERV 9 filters are not rated for particles smaller than 1 micron. Vehicle exhaust is a significant source of ultrafine particles (<0.1 microns), and it is not clear that the proposed filtration efficiency will meet the specified standard for ultrafine particles in a residential environment without additional evidence. Further, it is not clear in the Draft MND how sensitive members of the population (including children playing outdoors) may be impacted by freeway pollution while playing outdoors onsite.

Health Risk Assessment Technical Methodology

AQMD staff appreciates the lead agency's willingness to discuss some of the HRA technical methods on a conference call last week. The items discussed that the lead agency agreed to review included:

- a) The number of trucks travelling along the I-210 freeway
- b) The proportion of heavy heavy duty diesel trucks relative to total trucks
- c) The height of the freeway relative to its surroundings
- d) The date of the traffic counts used in the analysis
- e) The use of a lifetime exposure period (70 years) when comparing against AQMD thresholds
- f) Choice of dispersion model (AERMOD vs. ISC)
- g) Discussion of recent science discussing the potential health impacts of pollution found adjacent to freeways, including exposure to ultrafine particles.

Subsequent to our phone call, AQMD staff discovered that the PM10 and PM2.5 emissions modeled in the HRA for the criteria pollutant analysis only included road dust emissions and did not include tailpipe exhaust emissions. Lastly, on Friday afternoon we received a spreadsheet from the HRA consultant detailing some of the calculations for determining the truck fleet travelling along the freeway. This spreadsheet appears to

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contain adequate methods to determine the truck fleet proportion for this particular freeway segment.