



South Coast  
Air Quality Management District

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Planning and Redevelopment  
City of Glendora  
116 East Foothill Boulevard  
Glendora, CA 91741

**Draft Mitigated Negative Declaration (Draft MND) for the Proposed Administrative CUP (ACUP07-16); Minor CUP (MCUP07-15); Non-Conforming Lot Development Plan Review (DPR07-19); and Variance (V07-05)**

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 Mitigated Negative Declaration.

The SCAQMD would welcome any written responses to all comments contained herein prior to the adoption of the Final Mitigated Negative Declaration. 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, CEQA Section  
Planning, Rule Development & Area Sources

Attachment

SS:GM

LAC071226-02  
Control Number

### **Air Quality Analysis**

1. In the Draft Mitigated Negative Declaration's (MND) project description, the lead agency proposes the demolition of an existing 1,406 square foot residence and a partially built detached structure. In addition, the project description includes the construction of a 26,572 square foot day care center for a maximum of 100 children (ages 2-6) and 8 full-time staff on a 0.6-acre site. On page 3 of the Draft MND, the lead agency states that the Route 66 Specific Plan EIR was used as a tiering document for preparation of the proposed project. Although tiering is recommended in CEQA Guidelines §15152, it is not clear from the discussion in the Draft MND whether or not the tiering EIR analyzed the reasonably foreseeable environmental impacts specifically for this project. If site specific impacts for the proposed project were analyzed in the tiering EIR, it is recommended that they be summarized in the Final MND and that any mitigation measures relevant to the proposed project also be included in the Final MND. If the site specific impacts from the proposed project were not evaluated in the tiering document, but deferred to this later analysis, no site specific analysis was included in the Draft MND. As a result, the lead agency has therefore not demonstrated that the proposed project will not generate significant adverse construction or operational air quality impacts.
2. To calculate the proposed project's emission impacts, the lead agency can utilize the current URBEMIS 2007 land use emissions model, which can be accessed at <http://www.urbemis.com> or follow the calculation methodologies in Chapter 9 and the Appendix to Chapter 9 in the South Coast AQMD's CEQA Air Quality Handbook. Further, SCAQMD staff has compiled mitigation measures to be implemented if the impacts are determined to be significant. Mitigation measure suggestions can be found at [http://www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html) .

### **Localized Significance Thresholds**

3. Because the proposed site is located less than a quarter-mile from existing multi-family apartments to the west and a motel to the east, the SCAQMD recommends that a localized air quality analysis be prepared to ensure that the residents at the existing multi-family apartments and at the hotel are not adversely affected by the construction activities that are occurring in close proximity. SCAQMD guidance for performing a localized air quality analysis can be found at the following web address: <http://www.aqmd.gov/ceqa/handbook/LST/LST.html> .

### **PM2.5 Significance Thresholds**

4. In response to adoption of PM2.5 ambient air quality standards by U.S. EPA and CARB, SCAQMD staff has developed a methodology for calculating PM2.5 emissions when preparing air quality analyses for California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) documents. To determine if PM2.5 air quality impacts are significant, SCAQMD staff has also

developed recommended regional and localized significance thresholds. When preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a PM<sub>2.5</sub> significance analysis by following the guidance found at [http://www.aqmd.gov/ceqa/handbook/PM2\\_5/PM2\\_5.html](http://www.aqmd.gov/ceqa/handbook/PM2_5/PM2_5.html).

### **Potential Export and Disposal of Contaminated Soils**

5. Under Site Improvements on page 2 of the Environmental Checklist Form, the lead agency states that former land uses for the proposed site have been transmission and auto repair facilities and auto-body repair facilities that could have created the potential for soil contamination from those activity site uses. In the process of demolition of the existing structures, contaminated soil could be encountered. Therefore, the lead agency should cite compliance with SCAQMD Rule 1166 - Volatile Organic Compound Emissions from Decontamination of Soil, should the lead agency encounter volatile organic compounds.

### **Health Risk Assessment**

6. Based on preliminary estimates by SCAQMD staff, the potential cancer risk to the children and staff at the proposed day care center site from potential exposure to diesel particulate emissions from freight trains using the adjacent train tracks is significant, exceeding the maximum individual cancer risk level of 100 cancer cases in one million ( $100 \times 10^{-6}$ ). The SCAQMD's recommended significance threshold for cancer risk is 10 cancer cases in one million ( $10 \times 10^{-6}$ ). Since diesel particulates have been designated as a carcinogen by the California Air Resources Board and it appears that the proposed project will increase diesel particulate emissions at this site from trains slowing down to make turns, passing by, and potential queuing and idling, it is recommended that a detailed health risk assessment be conducted.

### **Siting of Sensitive Land Uses Near Rail Uses**

7. California Air Resources Board (CARB) has 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/aqhandbook.htm>. This document recommends against siting projects that include sensitive land uses (schools, residences, playgrounds, convalescent centers, nursing homes, long-term health care facilities, etc.) close to rail yards because of potential exposures to diesel particulate emissions from diesel train engines that may lead to adverse health effects beyond those associated with regional air pollution in urban areas. The key observation according to these studies cited in the CARB Handbook is that "close proximity to a source of diesel particulate emissions increases both exposure and the potential for adverse health effects."

According to the Draft MND, the proposed school site is located 40 feet (12 meters) from railroad tracks used by freight trains that use diesel engines and the future Gold-Line Light-Rail that uses electric power. There is no indication in the Draft MND whether or not there is a rail yard in the vicinity. In any event, depending on the

results of the health risk assessment (see comment #5), the project proponent should consider locating the proposed project at another location as far as possible from the railroad tracks. The lead agency is referred to the CARB Handbook for siting sensitive land uses near sources of diesel particulate matter.