



South Coast Air Quality Management District

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E-Mailed: January 25, 2013
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City of Vernon
4305 Santa Fe Avenue
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Review of the Draft Mitigated Negative Declaration (MND) for the 45-Unit Affordable Housing Development Project

The South Coast Air Quality Management District (AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are intended to provide guidance to the lead agency and should be incorporated into the final environmental document as appropriate.

The MND demonstrates that the residents living on the project site will be exposed to significant levels of air pollution from nearby industrial sources. Specifically, the MND states that residents at the preferred project site will be exposed to an incremental cancer risk of 26 in one million, however, the lead agency concludes that the project will result in less than significant air quality impacts. Further, the Health Risk Assessment (HRA) contained in the MND appropriately compares the project's cancer risk levels to AQMD's cancer burden threshold of 0.5 and the AQMD's Maximum Incremental Cancer Risk (MICR) threshold of 10 in one million. However, it appears that the lead agency based its significance determination solely on the cancer burden threshold. The AQMD CEQA significance thresholds are not intended to be individually selected and applied to projects; therefore, the AQMD staff recommends that the lead agency revise the MND to ensure that the air quality significance determination is based on all AQMD CEQA significance thresholds including the MICR value of 10 in one million.

If upon revision of the MND the lead agency determines that the project will have significant air quality impacts based on the HRA the AQMD staff recommends that the lead agency include the following mitigation measures in the final CEQA document.

- a. Specify conditions to ensure that high efficiency filters will continue to be maintained and replaced for the life of the project (e.g., through a provision in the covenants, conditions and restrictions, CC&Rs), and
- b. Consider maintaining positive pressure with the building's filtered ventilation system in living spaces to reduce infiltration of unfiltered outdoor air.

AQMD staff requests that the lead agency provide the electronic modeling files so that we can review them more thoroughly. Without these files, we can only offer partial comments as many details are not available to us. The lead agency may want to revise the HRA prior to finalizing the CEQA process for this project as there are several calculation procedures that may have led to spurious results in the HRA. These include the items identified below.

- The breathing rate of 16.2 m³/day in the HRA is lower than the District recommended rate of 21.14 m³/day (302 L/kg-day). This error results in reported risks that are too low.
- The HRA did not take into account the expected lower Diesel Particulate Matter (DPM) emissions in future vehicle fleets. This discrepancy results in reported risks that are too high.
- The results from modeling the I-710 freeway are unexpected as DPM accounts for only ~40% of the freeway risk. Typically DPM account for ~90% of the risk. Without access to the modeling files, AQMD staff is not able to verify the validity of the reported result.

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 CEQA document. Further, staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,



Ian MacMillan
Program Supervisor, CEQA Inter-Governmental Review
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IM:DG

LAC130109-04
Control Number