



**South Coast
Air Quality Management District**
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SENT VIA E-MAIL AND USPS:
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**Draft Mitigated Negative Declaration (Draft MND) for the
Mission Lofts, LLC – Planning Cases P14-0045, P14-0048, P15-0953, P15-0954**

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 CEQA document.

The proposed Project is the construction of a 212 unit mixed-use residential apartment building and 315 surface parking spaces. The Project is approximately 875 feet east of State-Route 91 and 150 feet east of an existing rail line. The lead agency quantified the project's construction and operation air quality impacts and has compared those impacts with the SCAQMD's recommended regional and localized daily significance thresholds. Based on its analyses, the lead agency has determined that construction and operational air quality impacts are less than significant.

Additionally, the lead agency conducted a Health Risk Assessment to determine the long-term air quality impacts from State-Route 91 and the rail line. The HRA found that maximum cancer risk from the freeway and rail line is 7.6 in one million, which is less than the SCAQMD significance threshold of 10 in one million. The SCAQMD staff has concerns about the assumptions used in the modeling, which underestimates risks. Additional details are included in the attachment.

Pursuant to Public Resources Code Section 21092.5, SCAQMD staff requests that the lead agency provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. Further, staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Jack Cheng, Air Quality Specialist, at (909) 396-2448, if you have any questions regarding the enclosed comments.

Sincerely,

Jillian Wong

Jillian Wong, Ph.D.
Program Supervisor
Planning, Rule Development & Area Sources

Attachment
JW:JC
RVC160311-02
Control Number

Attachment

Health Risk Assessment (HRA)

1. In all the AERMOD models, Source SLINE1 (“Rail Road”) has an emission rate of 0 g/s. By not including an emission rate for the rail road source, cancer impacts are underestimated. SCAQMD staff recommends that the lead agency update the rail road emission rate and recalculate the cancer risk.
2. The HRA analysis involved the use of separate discrete receptors placed in residential areas. Receptor locations should be placed at the boundaries of the residential property and not the residential structure. Residents are still exposed to pollutants while outside of their homes, e.g. children playing outdoors, being around a pool area, residents relaxing or walking outside, working outside on a balcony, cleaning a vehicle, etc. SCAQMD staff recommends that the lead agency revise the model using appropriate locations.
3. The lead agency used the FASTALL option when performing their AERMOD model. Please note that when using AERMOD, the regulatory default option should be used (i.e. without the use of the “FASTALL” or “FLAT” options). If the lead agency wishes to use the FASTALL option or any other regulatory non-default options, SCAQMD staff should be consulted prior to the start of modeling.

MERV Filters and HVAC Systems - Limits to Enhanced Filtration Units

4. The Lead Agency should consider the limitations of the proposed enhanced filtration for this project on the housing residents. For example, in a study that SCAQMD conducted to investigate filters¹ 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 there is a HVAC system that draws enough air to support the filter system and that the HVAC system is fully operable throughout the life of the project. In addition, there may be increased energy costs to the resident. The proposed filters also assumes that the filters operate 100 percent of the time while residents are indoors. It should be noted that these filters have no ability to filter out any toxic gasses from vehicle exhaust and would not reduce exposure when residents are outside of their homes, e.g. children playing outdoors, being around a pool area, residents relaxing or walking outside, working outside on a balcony, cleaning a vehicle, etc.

¹ <http://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf?sfvrsn=0> . This study evaluated filters rated MERV 13+ while the proposed mitigation calls for less effective MERV 12 or better filters. See also CARB link for the “Status of Research on Potential Mitigation Concepts to Reduce Exposure to Nearby Traffic Pollution” (August 23, 2012): http://www.arb.ca.gov/db/search/search_result.htm?q=Potential+Mitigation+Concepts+to+Reduce+Exposure+to+Nearby+Traffic+Pollution&which=arb_google&cx=006180681887686055858%3AAbew1c4wl8hc&srch_words=&cof=FORID%3A11 .