South Coast
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SENT VIA E-MAIL AND USPS:

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Draft Environmental Impact Report (Draft EIR) for the Proposed Rio Rancho III 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 EIR.

Project Description and Air Quality Analysis

The Lead Agency proposes to construct 110 single-family dwelling units on approximately 11.58 acres. The project is bounded by residential dwellings to the north, commercial uses to the east and south, and State Route (SR) 71 Freeway to the west (Proposed Project). In the Air Quality Section, the Lead Agency quantified the Proposed Project's construction and operational air quality impacts and compared those impacts to SCAQMD's regional and localized air quality CEQA daily significance thresholds. Based on the analyses, the Lead Agency found that the Proposed Project's construction and operational air emissions do not exceed SCAQMD's construction and operational thresholds.

Health Risk Assessment

When specific development is reasonably foreseeable as result of the goals, policies, and guidelines in the project, the Lead Agency should identify any potential adverse health risk impacts using its best efforts to find out and a good-faith effort at full disclosure in the CEQA document. Based on a review of aerial photographs, SCAQMD staff found that the Proposed Project would be located approximately 10 feet from SR-71, which has an average daily volume of 78,000 vehicles[1] including approximately 5,249 diesel fueled trucks. Because of the close proximity to the existing freeway, residents would be exposed to diesel particulate matter (DPM), which is a toxic air contaminant and a carcinogen.

Notwithstanding the court rulings, SCAQMD staff recognizes that the Lead Agencies that approve CEQA documents retain the authority to include any additional information they deem relevant to assessing and mitigating the environmental impacts of a project. Because of SCAQMD's concern about the potential public health impacts of siting sensitive populations within close proximity of freeways, SCAQMD staff recommends that, prior to approving the project, Lead Agencies consider the impacts of air pollutants on people who will live or work at the project and provide mitigation where necessary.

Since future residences of this Proposed Project would be exposed to toxic emissions from vehicles traveling on the nearby SR-71, SCAQMD staff recommends that the Lead Agency estimate potential health risks to these residents. To facilitate the purpose and goal of CEQA on public disclosure,

[1] Caltrans 2016 annual average daily traffic (Annual ADT) and truck volumes: http://www.dot.ca.gov/trafficops/census/.

SCAQMD staff recommends that the Lead Agency conduct a health risk assessment (HRA)[2] to disclose the potential health risks to the people who will live or work at the Proposed Project in the Final EIR[3].

Guidance Regarding Residences Sited Near a High-Volume Freeway or Other Sources of Air Pollution

SCAQMD staff recognizes that there are many factors Lead Agencies must consider when making local planning and land use decisions. To facilitate stronger collaboration between Lead Agencies and the SCAQMD to reduce community exposure to source-specific and cumulative air pollution impacts, the SCAQMD adopted the *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning* in 2005[4]. This Guidance Document provides suggested policies that local governments can use in their General Plans or through local planning to prevent or reduce potential air pollution impacts and protect public health. The SCAQMD staff recommends that the Lead Agency review this Guidance Document as a tool when making local planning and land use decisions.

Numerous health studies have demonstrated potential adverse health effects associated with living near highly travelled roadways. In traffic-related studies, the additional non-cancer health risk attributable to proximity is seen within 1,000 feet and is strongest within 300 feet[5]. California freeway studies show about a 70% drop off in particulate pollution levels at 500 feet[6]. As a result of these studies, the California Air Resources Board (CARB) developed the Air Quality and Land Use Handbook[7] that recommends avoiding new sensitive land uses (such as housing) within 500 feet of a freeway. Additional research has shown that the near roadway environment also contains elevated levels of many pollutants that adversely affect human health, including some pollutants that are unregulated (e.g., ultrafine particles) and whose potential health effects are still emerging[8].

Limits to Enhanced Filtration Units

Many strategies are available to reduce exposure, including building filtration systems, sounds walls, vegetation barriers, etc.[9] Because of the potential adverse health risks involved with siting housing near a freeway, it is essential that any proposed strategy must be carefully evaluated before implementation. In the event that enhanced filtration units on housing residents are proposed, the Lead Agency should consider the limitations of the enhanced filtration. For example, in a study that SCAQMD conducted to investigate filters[10], 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 the HVAC system is running, there may be increased energy costs to the resident. It is typically assumed that the filters operate 100 percent

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[2] "Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis" accessed at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis.

[3] SCAQMD has developed the CEQA significance threshold of 10 in one million for cancer risk. When SCAQMD acts as the Lead Agency, SCAQMD staff conducts a HRA, compares the maximum cancer risk to the threshold of 10 in one million to determine the level of significance for health risk impacts, and identifies mitigation measures if the risk is found to be significant.

[4] South Coast Air Quality Management District. May 2005. "Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning" Accessed at: http://www.aqmd.gov/home/library/documents-support-material/planning-guidance/guidance-document

[5] California Air Resources Board. April 2005. "Air Quality and Land Use Handbook: A Community Health Perspective." Accessed at: http://www.arb.ca.gov/ch/landuse.htm.

[6] *Ibid*.

[7] *Ibid*.

[8] In April 2017, ARB published a technical advisory, *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways: Technical Advisory*, to supplement ARB's Air Quality and Land Use Handbook: A Community Health Perspective. This Technical Advisory is intended to provide information on strategies to reduce exposures to traffic emissions near high-volume roadways to assist land use planning and decision-making in order to protect public health and promote equity and environmental justice.

[9] *Ibid*.

[10] This study evaluated filters rated MERV 13+ while the proposed mitigation calls for less effective MERV 12 or better filters. Accessed at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf. Also see also 2012 Peer Review Journal article by SCAQMD: http://d7.iqair.com/sites/default/files/pdf/Polidori-et-al-2012.pdf.

of the time while residents are indoors, and it does not account for the times when the residents have their windows or doors open or are in common space areas of the project. These filters also have no ability to filter out any toxic gases from vehicle exhaust. The presumed effectiveness and feasibility of any filtration units should therefore be evaluated in more detail prior to assuming that they will sufficiently alleviate near roadway exposures.

Enforceability of Enhanced Filtration Units

In the event that enhanced filtration units on housing residents are proposed, and to ensure that the enhanced filtration units are enforceable throughout the lifetime of the Proposed Project and that they are effective in reducing exposures to DMP emissions, SCAQMD staff recommends that the Lead Agency provide additional details on implementation and monitoring in the Final EIR. At a minimum, the Final EIR should discuss the responsible implementing and enforcement agency (or entity); recommended schedules for replacing the enhanced filtration units; ongoing monitoring schedules; ongoing cost sharing strategies, if any, for replacing the enhanced filtration units; disclosure on increased energy costs for running the HVAC system to prospective residents; criteria for assessing progress in installing and replacing the enhanced filtration units; and process for evaluating the effectiveness of the enhanced filtration units.

Pursuant to Public Resources Code Section 21092.5 and CEQA Guidelines Section 15088, SCAQMD staff requests that the Lead Agency provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final EIR. SCAQMD 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, CEQA IGR Section, at (909) 396-2448, if you have any questions regarding the enclosed comments.

Sincerely,

Lijin Sun

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