



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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**Mitigated Negative Declaration (MND) for the
Hawthorne Residential Project
(Planning Cases: P16-0112 (GPA), P16-0113 (RZ), P16-0114 (TM), P16-0111 (PRD), P16-0883
(VR), and 37032 (TTM))**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comment is meant as guidance for the Lead Agency and should be incorporated into the Final MND.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to demolish 23,295 square feet of existing on-site classroom buildings and associated school facilities and to construct 54 single-family detached residences on 6.25 acres (Proposed Project). The Proposed Project is generally bounded by residential development to the north and east, the Burlington Northern Santa Fe (BNSF) Railway and segment of the Upper Riverside Canal to the south, and a vacant site to the west. The BNSF Railway is utilized by BNSF Railway trains, Amtrak passenger rail, and the Riverside Transit Agency Metrolink passenger rail. In addition, State Route 91 (SR-91) is located approximately 200 feet north of the Proposed Project.

SCAQMD Staff's Summary of Air Quality Analysis

In the Air Quality Analysis Section, the Lead Agency quantified the Proposed Project's construction and operation emissions and compared them to SCAQMD's regional and localized air quality CEQA significance thresholds¹. The Lead Agency found that the Proposed Project's air quality impacts would be less than significant after incorporating Mitigation Measure (MM) AQ-1 and MM AQ-2.

SCAQMD Staff's Summary of Health Risk Assessment (HRA)

Due to the Proposed Project's proximity to the BNSF/Metrolink rail tracks and SR-91, the Lead Agency performed a HRA to disclose the health risks to future residents. The HRA concluded that the cancer risk would be 813 in one million for children over a nine-year exposure period and 1,170 in one million for adults over a 30-year exposure period, both of which would exceed SCAQMD's CEQA significance threshold of 10 in one million² for cancer risk. After incorporating MM AQ-1 requiring installation of minimum efficiency reporting value (MERV) 16 filters, the cancer risk would be reduced to 41 in one million for children over a nine-year exposure period and 58 in one million for adults over a 30-year exposure period, which would still exceed SCAQMD's CEQA significance threshold of 10 in one million for cancer risk.

¹ MND, Section 3.0, *Air Quality*. Page 17.

² *Ibid.* Page 29.

Limits to Enhanced Filtration Units: MM AQ-1

The Lead Agency proposed to install MERV 16 filters (MM AQ-1). Strategies are available to reduce exposure, including, but are not limited to, building filtration systems, sound walls, vegetation barriers, etc. Because of the potential adverse health risks involved with siting residences near a freeway or other sources of air pollution, it is essential that any proposed strategy must be carefully evaluated before implementation. When enhanced filtration units are proposed, the Lead Agency should consider the limitations of the enhanced filtration. For example, in a study that SCAQMD conducted to investigate filters³, 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 residents. It is typically assumed that the filters operate 100 percent 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 or locomotive 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. Further, since filtration units must be maintained and replaced on a regular basis, the Lead Agency should provide additional details on the maintenance and replacement method, schedule, costs, and/or responsible implementing agency to ensure that MM AQ-1 is enforceable and that enhanced filtration units are effective throughout the lifetime of the Proposed Project.

Guidance on Siting Residences Near a High-Volume Freeway or Other Sources of Air Pollution

SCAQMD staff acknowledges that the MND discloses the potential health risks to residents at the Proposed Project⁴ and 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 SCAQMD to reduce community exposure to source-specific and cumulative air pollution impacts, SCAQMD adopted the *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*⁵ in 2005. Additionally, the California Air Resources Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective*⁶ recommends avoiding siting residences within 500 feet of a freeway or 1000 feet for a rail line. These Guidance documents provide recommended 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.

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 or other sources of air pollution, SCAQMD staff recommends that the Lead Agency review and consider these Guidance documents when making local planning and land use decisions.

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process.

³ 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 the 2012 Peer Review Journal article by SCAQMD. Accessed at: <http://d7.iqair.com/sites/default/files/pdf/Polidori-et-al-2012.pdf>.

⁴ MND. Section 3.0, *Air Quality*. Page 19.

⁵ 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>

⁶ 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>.

SCAQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Ryan Bañuelos, Air Quality Specialist, CEQA Section, at (909) 396-3479, if you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

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Planning, Rule Development & Area Sources

LS:JC:RB

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