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Draft Sustainable Communities Environmental Assessment (SCEA) for the Proposed 3200 E. Foothill Boulevard Mixed Use 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 SCEA.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to demolish 29 buildings totaling 212,397 square feet and construct eight buildings with 550 residential units totaling 544,906 square feet and subterranean parking on 8.32 acres (Proposed Project). Based on Figure 2 in the Draft SCEA, the Proposed Project is located next to the 210 Freeway. Construction is expected to take approximately 33 months[1].

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 thresholds. The Lead Agency found that the Proposed Project's air quality impacts from construction would be less than significant after incorporating Mitigation Measure AQ-1 – Construction Equipment Control and applicable project-level mitigation measures from SCAG's 2016 RTP/SCS EIR and the 2015 Pasadena General Plan EIR and the East Pasadena Specific Plan EIR[2]. The Lead Agency also found that the Proposed Project's operational air quality impacts would be less than significant.

Health Risk Assessment from Mobile Sources and Other Sources of Air Pollution

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 land uses such as residential uses within close proximity of freeways, SCAQMD staff recommends that the Lead Agency review and consider the following comments when making local planning and land use decisions.

Sensitive receptors are people that have an increased sensitivity to air pollution or environmental contaminants. Sensitive receptors include schools, parks, playgrounds, daycare centers, nursing homes, elderly care facilities, hospitals, and residential dwelling units. Based on a review of the Project Description, SCAQMD staff found that the Proposed Project is located in proximity to the 210 Freeway. Residents at the Proposed Project would be exposed to diesel particulate matter (DPM) emissions from vehicles and diesel-fueled heavy-duty trucks traveling on the freeway. DPM is a toxic air contaminant and a carcinogen. To facilitate the purpose and goal of CEQA on public disclosure, SCAQMD staff

[1] Draft SCEA. Page 54.
[2] Draft SCEA. Pages 55 to 60.

recommends that the Lead Agency consider the impacts of air pollutants on people who will live at the Proposed Project by performing a HRA[3] analysis to disclose the potential health risks in the Final SCEA[4].

Guidance on Siting Sensitive Receptors Near a High-Volume Freeway and 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 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* in 2005[5]. This Guidance document provides 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. In addition, guidance on siting incompatible land uses (such as placing homes near freeways) can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Health Perspective*, which can be found at: http://www.arb.ca.gov/ch/handbook.pdf. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process.

Limits to Enhanced Filtration Units

Many strategies are available to reduce exposure, including, but are not limited to, building filtration systems, sounds walls, vegetation barriers, etc. Because of the potential adverse health risks involved with siting sensitive receptors near sources of air pollution, it is essential that any proposed strategy must be carefully evaluated before implementation. In the event that enhanced filtration units are installed at the proposed residential units either as a mitigation measure or project design feature requirement, SCAQMD staff recommends that the Lead Agency consider the limitations of the enhanced filtration. For example, in a study that SCAQMD conducted to investigate filters[6], a cost burden is expected to be within the range of $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 the environmental analysis does not generally account for the times when the residents have their windows or doors open or are in common space areas of the project. In addition, these filters have no ability to filter out any toxic gases from vehicle exhaust. Therefore, the presumed effectiveness and feasibility of any filtration units should be carefully evaluated in more detail prior to assuming that they will sufficiently alleviate exposures to DPM emissions.

Enforceability of Enhanced Filtration Units

If enhanced filtration units are used for the Proposed Project, 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 DPM emissions, SCAQMD staff recommends that the Lead Agency provide additional details on future operational and maintenance implementation and monitoring in the Final

[3] South Coast Air Quality Management District. "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.

[4] 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.

[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/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf.

[6] 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.

SCEA to facilitate a good faith effort at full disclosure. At a minimum, the Final SCEA should include the following information:

- Disclosure on increased energy costs for running the HVAC system to prospective residents;
- Disclosure on potential health impacts to prospective residents;
- 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; and
- Criteria for assessing progress in installing and replacing the enhanced filtration units; and process for evaluating the effectiveness of the enhanced filtration units.

Compliance with SCAQMD Rule 1403

Since the Proposed Project will demolish 29 buildings, and in the event asbestos is encountered during demolition, SCAQMD staff recommends that the Lead Agency include a discussion to demonstrate compliance with SCAQMD Rule 1403 in the Final SCEA.

Conclusion

Please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final SCEA. When responding to issues raised in the comments, response should provide sufficient details giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful or useful to decision makers and to the public who are interested in the Proposed Project.

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 me at lsun@aqmd.gov if you have any questions.

Sincerely,

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