



South Coast
Air Quality Management District
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E-mailed: March 23, 2012
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Mr. Steven Harris
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**Review of the Draft Mitigated Negative Declaration (MND)
for the Oakcrest Terrace 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 CEQA document as appropriate.

AQMD staff notes that this affordable housing project is located adjacent to the SR-91 freeway. In order to determine the potential air quality impacts on future residents, the lead agency conducted a health risk assessment to determine potential pollutant concentrations at the site. Unmitigated risks are reported as 91 in one million, above the significance threshold of 10 in one million. In order to reduce this risk to a less than significant level, the lead agency has proposed installing HEPA filters into the residential project to reduce the exposure to diesel particulate matter. AQMD staff is concerned about the potential placement of sensitive receptors so close to a freeway and provides the following comments on this analysis.

HRA Analysis Methodology – AADT Growth Rate

The HRA includes an assumption that Annual Average Daily Traffic on the SR-91 will increase 1% per year. The HRA states that this is a conservative assumption because traffic levels have remained flat from 2008 to 2010. This period represents a time of relatively low economic growth. AQMD is concerned that this growth rate does not reflect the comprehensive regional growth assumptions included in the most recent Regional Transportation Plan (RTP). For example, the HRA assumes that approximately 14,000 diesel vehicles will use the SR-91 freeway in 2030. However the recently released Final RTP indicates that truck traffic along the SR-91 will reach between 27,000 and 36,000 trips per day in this section (see Exhibit 2.8 of the Final RTP). AQMD staff recommends that the lead agency consider the truck traffic assumed in the RTP in its analysis of potential health risk impacts.

HRA Analysis Methodology – Criteria Pollutants

The dispersion modeling conducted for the HRA considered the toxic chemicals released from vehicle exhaust, however no assessment was conducted for criteria pollutant such as particulate matter (PM) or nitrogen oxides (NO₂). PM and NO₂ have recognized health effects, and ambient air quality standards have been established that recognize levels below which public health should be protected. PM emissions include vehicle exhaust and re-entrained road dust from tires passing over the road surface. Re-entrained road dust was not included in the HRA dispersion modeling. NO₂ impacts also may be of concern because the proposed mitigation, HVAC filtering, would not reduce these concentrations. AQMD staff recommends that the lead agency conduct dispersion modeling of these pollutants prior to making a final determination of significant impacts.

Mitigation Effectiveness

AQMD staff requests that additional information be provided to show the effectiveness of the proposed mitigation measure. For example, it is unclear who will ensure that the HEPA filters will be replaced over the life of the project. It is also unclear how this measure will reduce exposure when residents are outside, or when the system is turned off. Because AQMD staff has not seen HEPA filters used as a mitigation measure in a residential project before (typically the highest MERV rating for residential HVAC systems is 14), we also request that the lead agency provide additional clarification regarding how the system will be designed to ensure that no bypass of the system will occur, for example through doorways or windows.

Contact Information

Pursuant to Public Resources Code Section 21092.5, AQMD staff requests that the lead agency provide the AQMD 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 me at (909) 396-3244, if you have any questions regarding the enclosed comments.

Sincerely,



Ian MacMillan

Program Supervisor, CEQA Inter-Governmental Review
Planning, Rule Development & Area Sources

Attachment

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