



South Coast Air Quality Management District

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Review of the Draft Environmental Impact Report (Draft EIR) for the Pomona General Plan Update 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 document as appropriate.

Based on a review of the Draft EIR the SCAQMD staff recognizes the potential regional air quality benefits from the project compared to “traditional” development through a mix of land uses that could reduce the overall vehicle miles traveled (VMT) in the region. However, the SCAQMD staff is concerned that the proposed project could pose significant health risk impacts to future residents from emissions sources that have not been quantified and disclosed in the Draft EIR. Specifically, the lead agency is proposing a mix of land uses including residential uses (i.e., sensitive land uses)¹ in close proximity to the 10 Freeway, 60 Freeway and within industrial corridors that include high volume truck and rail activity which are prominent sources of toxic air contaminants (TACs). Per recent Caltrans data the 10 Freeway at Garey Avenue carries 235,000 vehicles per day and the 60 Freeway at the 71 Freeway junction carries 216,000 vehicles per day. Further, recent data provided in the 2012 Southern California Regional Transportation Plan indicates that 51 freight trains per day move along the Union Pacific rail line located between Bonita Avenue and Arrow Highway and this volume is expected to increase to 109 trains per day by 2035.²

¹ 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>

² See Table 8: Peak Day Train Volumes 2010, 2035 of the Goods Movement Appendix for the 2012 Southern California Regional Transportation Plan available at: <http://scagrtp.net/download>

The California Air Resources Board (CARB) identified PM from diesel-fueled engines as a TAC in 1998, following an exhaustive 10-year scientific assessment process. In addition, as part of the identification process, the Office of Environmental Health Hazard Assessment (OEHHA) evaluated the potential for diesel exhaust to affect human health. OEHHA found that exposure to diesel PM resulted in an increased risk of cancer and an increase in chronic non-cancer health effects including a greater incidence of cough, labored breathing, chest tightness, wheezing, bronchitis, and asthma. Further, there are a number of studies that show a correlation of adverse health impacts and proximity to roadways.

SCAQMD Staff Recommendations Regarding Potential Health Risks

Given that housing and many amenities associated with housing/residential development such as parks are considered sensitive land uses the SCAQMD staff recommends that the lead agency provide additional information about the level of diesel truck and freight in areas surrounding future residential sites. Further, the SCAQMD recommends that the lead agency incorporate air quality mitigation consistent with the CARB Land Use Handbook³ and preclude residential development within 500 feet of roads with 100,000 vehicles/day (i.e., consistent with the CARB recommendation mentioned above), avoid siting new sensitive land uses within 1,000 feet of a distribution center and ensures health risk impacts do not exceed SCAQMD CEQA Significance Thresholds for TAC's.⁴

In the event that the lead agency determines that it is not feasible to incorporate the above mentioned mitigation the lead agency should quantify the health effects from diesel PM in the environmental document prepared for the proposed project. There are a variety of air dispersion models available, including but not limited to, CAL3QHCR and AERMOD to conduct air dispersion modeling of mobile source emissions. Additional information on these models can be obtained at: www.epa.gov/scram001/dispersion_prefrec.htm. Further, there are several guidance documents available for air dispersion modeling and HRAs. The SCAQMD's recommended threshold for cancer risk should not exceed 10 in one million at any receptor location, when compared to the pre-project risk. Although recent case law may indicate that a health risk assessment evaluating these impacts are not required pursuant to CEQA, the lead agency should still take this opportunity to evaluate, and mitigate where feasible, the potential public health impacts associated with this project. Below is a discussion to assist the lead agency in developing a HRA for the proposed project.

HRA Guidance

The SCAQMD's Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis and be found at: http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.htm. Also, both Ports

³ The CARB Land Use Handbook is available at: <http://www.arb.ca.gov/ch/handbook.pdf>

⁴ SCAQMD CEQA Significance Thresholds are available at: <http://www.aqmd.gov/ceqa/handbook/signthres.pdf>

of Los Angeles and Long Beach have SCAQMD approved HRA protocols, ARB has air dispersion guidance in Appendix 7 of the Diesel Risk Reduction Plan, which can be found at: <http://www.arb.ca.gov/diesel/documents/rrpapp.htm>, and HARP can be downloaded from the ARB website at: <http://www.arb.ca.gov/toxics/harp/harp.htm>. Further, the California Air Pollution Control Officers Association has prepared guidance for health risk assessments available at: http://www.capcoa.org/wp-content/uploads/2012/03/CAPCOA_HRA_LU_Guidelines_8-6-09.pdf.

Contact Information

The 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 project. Further, staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,



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

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