



South Coast Air Quality Management District

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Draft Mitigated Negative Declaration (Draft MND) for the Proposed Park at Ladyface Mountain Senior Apartments 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 MND.

The Lead Agency proposes to develop a senior apartment complex with 46 dwelling units. The proposed residences will be sited near the Route 101 Freeway. These residences would be approximately 450 feet south of the freeway¹, of which Route 101 has an average daily traffic volume of 220,000 vehicles, which includes more than 12,100 diesel trucks. Because of the close proximity to the existing freeway, residents would be exposed to diesel particulate matter, which is a toxic air contaminant. The SCAQMD staff therefore recommends that the Lead Agency conduct a mobile source health risk assessment (HRA)² to disclose the potential health risks to the residents from vehicles that use the freeway including diesel-fueled vehicles that emit diesel particulate matter, which the California Air Resources Board (CARB) has determined to be carcinogenic.

Numerous health studies have demonstrated the potential adverse health effects of living near highly travelled roadways. As a result of these studies, the California Air Resources Board recommended in 2005 avoiding the siting of housing within 500 feet of a freeway in their Land Use Handbook.³ Since the time of that study, additional research has continued to build the case 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.⁴

While the health science behind recommendations against placing new homes close to freeways is clear, SCAQMD staff recognizes the many factors lead agencies must consider when siting new housing. Further, many mitigation measures have been proposed for other projects to reduce exposure, including building filtration systems, sound walls, vegetation barriers, etc. However, because of the potential health risks involved it is critical that any proposed mitigation must be carefully evaluated prior to determining if those health risks would be brought below recognized significance thresholds.

¹ Aerial map inspection.

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 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>

⁴ See Chapter 9 of the 2012 AQMP for further information

Accessed at: <http://www.aqmd.gov/aqmp/2012aqmp/Final-February2013/Ch9.pdf>

Limits to Enhanced Filtration Units

The Lead Agency should consider the limitations of the proposed mitigation for this project (enhanced filtration) on housing residents. For example, in a study that SCAQMD conducted to investigate filters⁵ similar to those proposed for this project, 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. The proposed mitigation assumes that the filters operate 100 percent of the time while residents are indoors and 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 gasses from vehicle exhaust. The presumed effectiveness and feasibility of this mitigation should therefore be evaluated in more detail prior to assuming that it will sufficiently alleviate near roadway exposures.

The SCAQMD staff is available to work with the Lead Agency to address these concerns and any other air quality questions that may arise. Please contact Jack Cheng, Air Quality Specialist at (909) 396-2448, if you have any questions regarding these comments. We look forward to reviewing and providing comments for the Final MND associated with this project.

Sincerely,

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⁵ 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>.