



South Coast Air Quality Management District

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Mitigated Negative Declaration (MND) for the Proposed Oakmont Agoura Hills Project

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 construct a new 71,020-square-foot assisted living and memory care facility with a total disturbance footprint of 3.57 acres (Proposed Project). The Proposed Project is generally bounded by single-family residential uses to the north, commercial uses to the east and west, and U.S. Route 101 (U.S. 101) to the south. Based on a review of aerial photographs, SCAQMD staff found that the Proposed Project would be located less than 100 feet from U.S. 101. Construction is expected to last approximately one year, beginning in 2018.

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 would be less than significant. However, based on a review of the Air Quality Analysis, the Lead Agency did not conduct a Health Risk Assessment (HRA). Detailed comments are included below.

Health Risk Assessment from Mobile 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 populations within close proximity of freeways or other sources of air pollution such as a gasoline dispensing station, SCAQMD staff recommends that the Lead Agency review and consider the following comments when making local planning and land use decisions.

Health Risk Assessment due to the Proposed Project's Proximity to U.S. 101

Sensitive receptors are people that have an increased sensitivity to air pollution or environmental contaminants. Sensitive receptors include schools, parks and 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 U.S. 101 which has an average daily volume of 207,000 vehicles including 11,282 diesel fueled trucks¹. Because of the

¹ Caltrans 2015 Annual Average Daily Truck Traffic on the California State Highway System. http://www.dot.ca.gov/trafficops/census/docs/2015_aadt_truck.pdf.

close proximity to the existing freeway, residents would be exposed to diesel particulate matter (DPM), which is a toxic air contaminant and a carcinogen. To facilitate the purpose and goal of CEQA on public disclosure, SCAQMD staff recommends that the Lead Agency consider the impacts of air pollutants on people (e.g., seniors) who will live and work at the Proposed Project by performing an HRA² to disclose the potential health risks in the Final MND³.

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 2005⁴. 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.

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. Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. 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, at (909) 396-3479, if you have any questions.

Sincerely,
Lijin Sun, J.D.

Lijin Sun

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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 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.

⁴ 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>