South Coast
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Mitigated Negative Declaration (MND) for the Proposed Parkford Drive 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 5,000-square-foot retail building, a 9,900-square-foot child care center, and a 120-foot freeway-oriented sign on 6.13 acres (Proposed Project). Construction is scheduled to take approximately seven months. Based on a review of aerial photographs, SCAQMD staff found that the Proposed Project is bounded by Interstate 10 (I-10) to the north and northeast, a vacant lot and a gasoline station to the south, single-family residential uses to the southwest, and multi-family residential uses to the northwest.

Mobile Source Health Risk Assessment

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, SCAQMD staff recommends that, prior to approving a project, the Lead Agency consider the impacts of air pollutants on people who will live and work in a new project and provide mitigation where necessary.

When specific development is reasonably foreseeable as result of the goals, policies, and guidelines in the Proposed Project, the Lead Agency should identify any potential adverse health risk impacts using its best efforts and a good-faith effort at full disclosure in the CEQA document. As described above, SCAQMD staff found that the Proposed Project would facilitate the siting of sensitive receptors (e.g., a child care center) immediately adjacent to the I-10 Freeway, which has an average daily volume of 296,000 vehicles including approximately 10,627 diesel fueled trucks[1]. Because of the close proximity to the existing freeway, children at the child care facility would be exposed to diesel particulate matter (DPM), which is a toxic air contaminant and a carcinogen. DPM emitted from diesel powered engines (such as trucks) has been classified by the state as a toxic air contaminant and a carcinogen. In 2015, the California Office of Environmental Health Hazard Assessment (OEHHA) Guidance revised their health assessment guideline

[1] California Department of Transportation (Caltrans) 2015 annual average daily traffic (Annual ADT) and truck volumes: http://www.dot.ca.gov/trafficops/census/ . The 296,000 daily traffic volume (for I-10 at La Brea Avenue) is from the Peak Month ADT, which is the average daily traffic for the month of the heaviest traffic flow. This data is obtained because on many routes, high traffic volumes, which occur during a certain season of the year, are more representative of traffic conditions than the annual ADT.

to acknowledge that children are more susceptible to the exposure to air toxics[2]. One of the basic purposes of CEQA is to inform decision makers and the public about the potential, significant environmental effects of proposed activities (CEQA Guidelines Section 15002(a)(1)). Therefore, SCAQMD staff recommends that the Lead Agency conduct a health risk assessment (HRA)[3] to disclose the potential health risks to children from the vehicle emissions coming from vehicles operating on the I-10 Freeway and include the analysis in the Final MND[4].

Guidance Regarding Sensitive Receptors Sited Near a High-Volume Freeway or 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 (Guidance Document) in 2005. The Guidance Document provides suggested 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. SCAQMD staff recommends that the Lead Agency review this Guidance Document as a tool when making local planning and land use decisions. The Guidance Document is available on SCAQMD's website at: http://www.aqmd.gov/home/library/documents-support-material/planning-guidance/guidance-document. Additional guidance on siting incompatible land uses (such as placing homes or child care centers near freeways or other polluting sources) can be found in the California Air Resources Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective*, which can be found at: http://www.arb.ca.gov/ch/handbook.pdf.

Numerous health studies have demonstrated potential adverse health effects associated with proximity to highly travelled roadways. In traffic-related studies, the additional non-cancer health risk attributable to proximity is seen within 1,000 feet and is strongest within 300 feet[5]. California freeway studies show about a 70% drop off in particulate pollution levels at 500 feet[6]. As a result of these studies, the CARB developed a Land Use Handbook[7] that recommends avoiding new sensitive land uses (such as child care center) within 500 feet of a freeway. Additional research has shown 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[8].

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[2] Office of Environmental Health Hazard Assessment. March 6, 2016. *Air Toxics Hot Spots Program Guidance Manual for the Preparation of Health Risk Assessments 2015*. Available at: https://oehha.ca.gov/air/crnr/notice-adoption-air-toxics-hot-spots-program-guidance-manual-preparation-health-risk-0.

[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] California Air Resources Board. April 2005. "*Air Quality and Land Use Handbook: A Community Health Perspective*." Page 6. Accessed at: http://www.arb.ca.gov/ch/landuse.htm.

[6] *Ibid*.

[7] *Ibid*.

[8] South Coast Air Quality Management District. *Air Quality Management Plan*. 2012. Accessed at: http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2012-air-quality-management-plan/final-2012-aqmp-(february-2013)/chapter-9-final-2012.pdf .

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.[9] Because of the potential adverse health risks involved with siting sensitive receptors near a freeway, it is essential that any proposed strategy must be carefully evaluated before implementation. In the event that enhanced filtration units are proposed, the Lead Agency should consider the limitations of the enhanced filtration. For example, in a study that SCAQMD conducted to investigate filters,[10] 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. It is typically assumed that the filters operate 100 percent of the time while children and teachers are indoors, and it does not account for the times when the children and teachers are outside. These filters also have no ability to filter out any toxic gases from vehicle exhaust. The presumed effectiveness and feasibility of any filtration units should therefore be evaluated in more detail prior to assuming that they will sufficiently alleviate near roadway exposures.

Compliance with SCAQMD Rule 1166

Based on the project description, a gas station is to the south of the Proposed Project. In the event that soil containing petroleum hydrocarbons are encountered during soil disturbance activities, that portion of the Proposed Project will be subject to the requirements of SCAQMD 1166- Volatile Organic Compound Emissions from Decontamination of Soil. The Final MND should also discuss and provide additional information to demonstrate compliance with SCAQMD Rule 1166.

Pursuant to the 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 SCAQMD staff 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 other air quality and health risk questions that may arise. Please contact me at (909) 396-3308, if you have any questions regarding these comments.

Sincerely,

Lijin Sun

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[9] California Air Resources Board. April 2017. *"Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways"*. Accessed at https://www.arb.ca.gov/ch/landuse.htm. This Technical Advisory is intended to provide information on strategies to reduce exposures to traffic emissions near high-volume roadways to assist land use planning and decision-making in order to protect public health and promote equity and environmental justice.

[10] 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 the 2012 Peer Review Journal article by SCAQMD: http://d7.iqair.com/sites/default/files/pdf/Polidori-et-al-2012.pdf .