



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

September 12, 2018

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Mitigated Negative Declaration (MND) for the Proposed Newport & Ford Residential Project (GP-18-02, R-18-01, PA-18-05, TTM 18156) 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 CEQA document.

SCAQMD Staff's Summary of Project Description

The lead agency proposes to construct 9 buildings on 1.86 acres, which will provide 38 residential townhome units (proposed project). The project is located at 1957 and 1963 Newport Boulevard, and 390 Ford Road in the City of Costa Mesa. Upon review of the MND, SCAQMD staff found that the proposed project is within 500 feet of State Route 55 (SR-55).

SCAQMD Staff's Summary of Air Quality Analysis

In the air quality analysis, the lead agency determined that the proposed project would have less than significant impacts to air quality. However, the lead agency did not prepare a Health Risk Assessment (HRA) that discloses the potential air quality impacts associated with placing sensitive receptors (i.e. residents) in close proximity to a major roadway. Please see SCAQMD staff's detailed comment below.

SCAQMD Staff's Comments

The proposed project will place sensitive receptors within 500 feet of SR-55, a major highway with over 100,000 average daily trips.¹ Future residents at the proposed project may be exposed to toxic air containments, such as diesel particulate matter (DPM), from vehicles and heavy duty, diesel-fueled trucks traveling on the freeway. To facilitate the purpose and goal of CEQA on public disclosure, SCAQMD staff recommends that the lead agency consider the impacts of air pollutants, such as DPM, on people who will live at the proposed project by performing an HRA analysis.² Results of the HRA should be disclosed in the final CEQA document.³ Additional guidance for siting sensitive receptors near high-volume freeways and other sources of air pollution can be found in the California Air Resources Board's Air Quality and Land Use Handbook: *A Community Health Perspective*.⁴

¹ MND. Page 42.

² 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>.

³ SCAQMD has developed the CEQA significance threshold of 10 in one million for cancer risk. When SCAQMD acts as a lead agency, SCAQMD staff conducts a HRA, compares the maximum cancer risk to the threshold of 10 in one million, determines the level of significance for health risk impacts, and identifies mitigation measures if the risk is found to be significant.

⁴ California Air Resources Board. "Air Quality and Land Use Handbook: *A Community Health Perspective*." Accessed at: <http://www.arb.ca.gov/ch/handbook.pdf>

Closing

Pursuant to CEQA Guidelines Section 15074, prior to approving the proposed project, the lead agency shall consider the final CEQA document for adoption together with any comments received during the public review process. Please provide the SCAQMD with written responses to the comment contained herein prior to the adoption of the final CEQA document. When responding to issues raised in the comments, response should provide sufficient details giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful or useful to decision makers and the public who are interested in the proposed project.

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 Alina Mullins, Assistant Air Quality Specialist, at amullins@aqmd.gov or (909) 396-2402, should you have any questions.

Sincerely,

Daniel Garcia

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Planning, Rule Development & Area Sources

DG/AM

ORC180814-03

Control Number