



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL AND USPS:

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wcarvalho@anaheim.net

Wayne Carvalho, Contract Planner
City of Anaheim – Planning Department
200 South Anaheim Boulevard, Suite 162
Anaheim, CA 92805

Mitigated Negative Declaration (MND) for the Proposed Euclid and Broadway Residential 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.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to demolish 102,432 square feet of existing commercial structures and construct 39 condominium units totaling 87,529 square feet on 2.35 acres (Proposed Project). The Proposed Project is bounded by two gasoline stations to the northwest, residential uses to the east and west, and commercial uses to the south.

SCAQMD Staff's Summary of Air Quality Analysis and Comments

In the Air Quality analysis, the Lead Agency found that the Proposed Project's construction and operational air quality impacts would be less than significant. But, the Lead Agency did not conduct a health risk assessment (HRA). The Proposed Project will be sited next to two gasoline dispensing stations. Residents at the condominium units would be exposed to benzene, ethylbenzene, and naphthalene, and all of which are known human carcinogens. To disclose the potential health risks from exposures to those human carcinogens, SCAQMD staff recommends conducting a HRA in the Final MND¹.

The Lead Agency included a discussion on CARB's Air Quality and Land Use Handbook recommendation and the cancer risk associated with the Mobil gasoline station that is located at 1680 West Broadway. However, the cancer risk cited for the Mobile gasoline station² is for the residential community 50 meters east of the gasoline station and not the Proposed Project, which will be sited immediately adjacent to the Mobile gasoline station. Additionally, the Air Quality analysis did not include a discussion on the potential cumulative health impacts from the second gas station that is located at 260 Euclid Street. Therefore, SCAQMD staff recommends that the Lead Agency disclose the potential health risks from both gasoline dispensing stations in the HRA. Guidance for performing a gasoline dispensing station health risk assessment is available at SCAQMD website³.

¹ 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.

² Initial Study/Mitigated Negative Declaration. Page 50.

³ South Coast Air Quality Management District. *Risk Assessment Procedures – Appendix X*. <http://www.aqmd.gov/docs/default-source/planning/risk-assessment/riskassprocjune15.pdf>

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. 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 Jack Cheng, Air Quality Specialist, CEQA IGR Section, at (909) 396-2448, if you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

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