



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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**Draft Environmental Impact Report (Draft EIR) for the Proposed
General Plan Amendment GPA 14-01, Zone Change ZC 14-02, Tentative Tract Map TT 17433, Site
Development Permit SP 12-07, and Minor Adjustment MA 15-09 – Sun Pointe 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 EIR.

Project Description and Air Quality Analysis

The Lead Agency proposes to construct 71 dwelling units on a 19.5-acre site (“proposed project”). The proposed project is bounded by a residential neighborhood to the north and west, undeveloped open space to the south, and an automotive dealership, railroad tracks, and Interstate Highway 5 (I-5) to the east. In the Air Quality section, the Lead Agency quantified the proposed project’s construction and operational emissions and compared those emissions to the SCAQMD’s regional and localized air quality CEQA significance thresholds to determine the significance of air quality impacts. The Lead Agency found that the proposed project’s construction and operational air impacts would be less than significant after mitigation¹.

Health Risk Assessment from Mobile Sources and Other Sources of Air Pollution

Based on a review of the Air Quality analysis, SCAQMD staff found that the Lead Agency did not estimate long-term health risks to people living and working at the proposed project from the exposures to emissions from mobile sources generated from nearby freeway vehicles, the fuel dispensing station, and the rail operation. SCAQMD staff reviewed the aerial photographs² and found that the proposed project will be located approximately 450 feet west of the I-5. The I-5 has an average daily traffic volume of 278,600 vehicles which includes more than 11,088 diesel trucks³. Moreover, SCAQMD staff found that the proposed project will be located approximately 300 feet from a fuel dispensing station (SCAQMD Facility ID# 137491) at the automotive dealership. Furthermore, SCAQMD staff found that the proposed project is located in close proximity to the railroad tracks. The railroad tracks are operated by the Southern California Regional Rail Authority (Metrolink). A federal database⁴ indicates that these railroad tracks show a daily train activity with approximately 45 trains powered by diesel-fueled locomotive engines. Therefore, SCAQMD staff believes that people living and working at the proposed project would be exposed to diesel particulate matter (DPM) emitted from diesel powered engines (such as trucks and locomotives) and benzene from the fueling dispensing station. Both DPM and benzene are toxic air contaminants and carcinogens.

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

¹ SunPointe Residential Draft Environmental Impact Report, Section 3.2.4 Impact Analysis (Page 3.2-6).

² Aerial map inspection. Also see Notice of Availability Attachments 1 through 3: Figure 1, *Project Location*, Figure 2, *Project Site Aerial*, and Figure 3, *Site Plan SunPointe Residential Project*.

³ CalTrans Annual Average Daily Truck Traffic. Accessed at: http://www.dot.ca.gov/trafficops/census/docs/2015_aadt_truck.pdf.

⁴ Federal Railroad Administration Office of Safety Analysis. June 7, 2017. Accessed at: <http://safetydata.fra.dot.gov/OfficeofSafety/publicsite/crossing/xingqryloc.aspx>.

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 the freeways and other sources of air pollution (such as railroad tracks and fuel dispensing station), SCAQMD staff will continue to recommend that, prior to approving a project, Lead Agencies consider the impacts of air pollutants on people who will live in a new project and provide mitigation where necessary.

One of the basic purposes of CEQA is to inform governmental decision makers and the public about the potential, significant environmental effects of proposed activities (CEQA Guidelines Section 15002(a)(1)). The goal of an EIR is to inform governmental decision makers and the public generally of the environmental impacts of a proposed project (CEQA Guidelines Section 15003(c)). Since future residences at the proposed project would be exposed to toxic emissions from the nearby sources of air pollution, SCAQMD staff believes that the Lead Agency should take this opportunity to estimate potential health risks to these residents using its best efforts to find out and a good-faith effort at full disclosure in the Final EIR. Otherwise, the Lead Agency has not demonstrated, supported by substantial evidence, that public health will not be significantly impacted by the proposed project. Therefore, SCAQMD staff therefore recommends that the Lead Agency conduct a health risk assessment (HRA)⁵ to disclose the potential health risks to the people who will live and work at the proposed project.

Guidance Regarding Residences 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 the SCAQMD to reduce community exposure to source-specific and cumulative air pollution impacts, the SCAQMD adopted the Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning in 2005. This 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. This Guidance Document is available on SCAQMD's website at: <http://www.aqmd.gov/home/library/documents-support-material/planning-guidance/guidance-document>.

Numerous health studies have demonstrated potential adverse health effects associated with living near 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 feet⁶. California freeway studies show about a 70% drop off in particulate pollution levels at 500 feet⁷. As a result of these studies, the California Air Resources Board (CARB) developed the Air Quality and Land Use Handbook⁸ that recommends avoiding new sensitive land uses (such as housing) within 500 feet of a freeway and within 300 feet of a large fueling station. 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 emerging⁹. Guidance¹⁰ on strategies to reduce air pollution exposure near high-volume roadways can be found at: https://www.arb.ca.gov/ch/rd_technical_advisory_final.PDF.

⁵ 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>. Also see the SCAQMD guidance for performing a gasoline dispensing station health risk assessment ("Risk Assessment Procedures – Appendix X"), which can be found at: <http://www.aqmd.gov/docs/default-source/planning/risk-assessment/riskassprocjune15.pdf>.

⁶ 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>.

⁷ *Ibid.*

⁸ *Ibid.*

⁹ See Chapter 9 of the 2012 AQMP for further information. 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](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)

¹⁰ In April 2017, CARB published a technical advisory, *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways: Technical Advisory*, to supplement CARB's Air Quality and Land Use Handbook: A Community Health Perspective. 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. Accessed at: <https://www.arb.ca.gov/ch/landuse.htm>.

Mitigation Measures and Limits to Enhanced Filtration Units

In the event that the Lead Agency, after performing an HRA for analyzing long-term health risks, finds that the maximum cancer risk for the proposed project would exceed the SCAQMD's CEQA significance threshold of 10 in one million, the identification and evaluation of mitigation measures are required to reduce health impacts below the significance level before the Final EIR is considered for certification (CEQA Guideline Section 15126.4).

Many mitigation measures have been proposed for other projects to reduce exposure, including, but are not limited to, building filtration systems, sound walls, vegetation barriers, etc.¹¹ Because of the potential adverse health risks involved with siting housing near a freeway and other sources of air pollution, it is essential that any proposed mitigation measure must be carefully evaluated in order to determine if those health risks would be brought below recognized significance thresholds.

In the event that enhanced filtration units on housing residents are proposed as a mitigation measure, the Lead Agency should consider the limitations of the enhanced filtration. For example, in a study that SCAQMD conducted to investigate filters¹², 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. It is typically assumed that the filters operate 100 percent of the time while residents are indoors, and it 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 gases from vehicle exhaust. The presumed effectiveness and feasibility of any filtration units, if proposed as a mitigation measure, should therefore be evaluated in more detail prior to assuming that they will sufficiently alleviate near roadway exposures.

Pursuant to the Public Resources Code Section 21092.5 and the CEQA Guidelines Section 15088, the Lead Agency is required to provide the SCAQMD with written proposed responses to all comments contained herein prior to the certification of the Final EIR. SCAQMD staff is available to work with the Lead Agency to address any questions that may arise from the comments included in this letter. Please contact Jack Cheng, Air Quality Specialist, CEQA IGR Section, at (909) 396-2448, if you have any questions regarding the comments.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS:JC

ORC170428-01

Control Number

¹¹ *Ibid.*

¹² 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 the 2012 Peer Review Journal article by SCAQMD: <http://d7.iqair.com/sites/default/files/pdf/Polidori-et-al-2012.pdf>.