



South Coast Air Quality Management District

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**Mitigated Declaration (MND) for the Proposed
Mixed-Use Residential & Commercial Development Project Located at 5181 W. Adams
Boulevard in the City of Los Angeles (ENV-2015-1342-MND)**

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. Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND.

Project Description

The Lead Agency proposes to demolish two existing commercial buildings in order to construct a 97,920-square-foot multi-floor residential and commercial building that includes 72 units and approximately 27,000 square feet of commercial space. Approximately 167 parking spaces will be provided in a two-level podium structure, with one level at grade and one below grade. The Lead Agency analyzed project regional and localized air quality impacts using the California Emissions Estimator Model (CalEEMod) land use model and determined that those emissions were less than the recommended SCAQMD significant thresholds.

Mobile Source Health Risk Assessment

Based on a review of aerial photographs, the SCAQMD staff found that the proposed project would site future residents less than 300 feet from the Interstate 10 Freeway (I-10 Freeway), which has an average daily volume of 296,000 vehicles¹ including approximately 10,627 diesel fueled trucks. Because of the close proximity to the existing freeway, residents would be exposed to diesel particulate matter (DPM), which is a toxic air contaminant and a carcinogen. The SCAQMD staff therefore recommends that the Lead Agency conduct a mobile source health risk assessment (HRA)² to disclose the potential health risks to the residents from vehicles that use the freeway including diesel-fueled vehicles that emit diesel particulate matter.

¹Caltrans 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. The 97,920 daily truck volume (2015 Truck Traffic) is from the Truck percentage of Total Vehicles estimated at I-10 and 10th Avenue.

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>.

CARB Guidance Regarding Residences Sited Near a High-Volume Freeway

Numerous health studies have demonstrated potential adverse health effects associated with living near highly travelled roadways. As a result of these studies, the California Air Resources Board (CARB) developed a Land Use Handbook³ that recommends avoiding the siting of housing 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 emerging⁴.

While the health science behind recommending against placing new homes in close proximity to freeways is clear, the SCAQMD staff recognizes that there are many factors lead agencies must consider when siting new housing. Further, many mitigation measures have been proposed for other projects to reduce exposure, including building filtration systems, sound walls, vegetation barriers, etc. However, because of the potential adverse health risks involved with siting housing near a freeway, it is essential that any proposed mitigation must be carefully evaluated in order to determine if those health risks would be brought below recognized significance thresholds.

Limits to Enhanced Filtration Units

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 filters⁵, 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.

Compliance With SCAQMD Rules

Finally, the proposed project includes demolition, so the Lead Agency should discuss and provide additional information regarding compliance with SCAQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities in the Final MND. In the event that soils containing petroleum hydrocarbons are encountered during soil disturbance activities, that portion of the proposed project will be subject to the requirements of SCAQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil. The Final MND should include how the Lead Agency will comply with Rule 1166.

³ California Air Resources Board. April 2005. “Air Quality and Land Use Handbook: A Community Health Perspective.” Accessed at: <http://www.arb.ca.gov/ch/landuse.htm>

⁴ See Chapter 9 of the 2012 AQMP for further information. Accessed at: <http://www.aqmd.gov/aqmp/2012aqmp/Final-February2013/Ch9.pdf>

⁵ 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>.

The SCAQMD staff is available to work with the Lead Agency to address these issues and any other air quality and health risk assessment questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA IGR Section, at (909) 396-3302 or by email at gmize@aqmd.gov, if you have any questions regarding these comments.

Sincerely,

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