



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

February 23, 2017

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Negative Declaration (ND) for the Proposed Project Located at 11301 & 11321 Camarillo St, North Hollywood (ENV-2016-4333)

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 ND.

The proposed project would remove existing structures and associated surface parking lot paving from the site and construct an approximately 57,611-square-foot, five-story mixed-use building with 60 dwelling units and a subterranean parking level on 0.67 acres. The surrounding land uses are predominantly multi-story multi-family residential structures to the north, east, and south, and commercial uses to the west and south.

Notwithstanding the court rulings, the SCAQMD staff recognizes that the Lead Agencies (such as a city or county or air district) 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, the SCAQMD staff will continue to recommend that, prior to approving the project, Lead Agencies consider the impacts of air pollutants on people who will live in a new project and provide mitigation where necessary.

Based on a review of aerial photographs, the SCAQMD staff found that the proposed residential project would site future residents approximately 333 feet from or within 500 feet of the Hollywood Freeway (State Route 170), which has an average daily volume of 179,000 vehicles¹ including approximately 6,944 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. Therefore, the SCAQMD staff 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. Prior to approving the project, the Lead Agency should consider the potential health risk impacts.

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. In traffic-related studies, the additional non-cancer health risk attributable to

¹ Caltrans 2015 annual average daily traffic (Annual ADT) and truck volumes: <http://www.dot.ca.gov/trafficops/census/>.

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>.

proximity is seen within 1,000 feet and is strongest within 300 feet³. California freeway studies show about a 70% drop off in particulate pollution levels at 500 feet⁴. As a result of these studies, the California Air Resources Board (CARB) developed a Land Use Handbook⁵ that recommends avoiding new sensitive land uses (such as 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 emerging⁶.

Limits to Enhanced Filtration Units

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 making local planning and land use decisions such as 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.

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 filters⁷, 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.

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

Sincerely,

Lijin Sun

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Planning, Rule Development & Area Sources

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LAC170202-04

Control Number

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 Ibid.

⁵ Ibid.

⁶ See Chapter 9 of the 2012 AQMP for further information. Accessed at: <http://www.aqmd.gov/aqmp/2012aqmp/Final-February2013/Ch9.pdf>.

⁷ 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>.