



# South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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## Draft Environmental Impact Report (EIR) for the Los Robles Apartments Project

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 EIR.

### SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to demolish existing apartment buildings and construct a new residential community containing 307 apartments, 55,180 square feet of recreational areas, and subterranean parking on 3.53 acres (Proposed Project). The Proposed Project is generally bounded by Interstate 210 (I-210) to the north, residential development to the east, commercial development to the south, and office to the west. Based on a review of aerial photographs, SCAQMD staff found that the Proposed Project would be located less than 100 feet from I-210 and is adjacent to a gasoline dispensing station. Construction is expected to last approximately two years, beginning in July 2018.

### SCAQMD Staff's Summary of Air Quality Analysis

In the Air Quality Analysis Section, the Lead Agency quantified the Proposed Project's construction and operation emissions and compared them to SCAQMD's regional and localized air quality CEQA significance thresholds. The Lead Agency found that the Proposed Project's air quality impacts would be less than significant. However, based on a review of the Air Quality Analysis, the Lead Agency did not conduct a Health Risk Assessment (HRA). Detailed comments are included below.

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

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 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 or other sources of air pollution such as a gasoline dispensing station, SCAQMD staff recommends that the Lead Agency review and consider the following comments when making local planning and land use decisions.

#### *Health Risk Assessment due to the Proposed Project's Proximity to I-210*

The goal of an EIR is to inform government agencies and the public of the environmental impacts of a Proposed Project (CEQA Guidelines Section 15003(c)). Based on a review of the Project Description, SCAQMD staff found that the Proposed Project is located in proximity to I-210 which has an average

daily volume of 305,001 vehicles including 17,714 diesel fueled trucks<sup>1</sup>. 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. To facilitate the purpose and goal of CEQA on public disclosure, SCAQMD staff recommends that the Lead Agency consider the impacts of air pollutants on people who will live and work at the Proposed Project by performing an HRA to disclose the potential health risks in the Final EIR.

*Health Risk Assessment due to the Proposed Project's Proximity to a Gasoline Dispensing Station*

Additionally, based on the project description, residents at the Proposed Project would be sited adjacent to a gasoline dispensing station and have a high chance to be exposed to toxic emissions from the station. Therefore, SCAQMD staff recommends that the Lead Agency conduct a HRA to disclose the potential health risks from the gasoline dispensing station to the people who will live and work at the Proposed Project in the Final EIR. Guidance for performing a gasoline dispensing station HRA (“*Emission Inventory and Risk Assessment Guidelines for Gasoline Dispensing Stations*”) can be found at: [http://www.aqmd.gov/docs/default-source/planning/risk-assessment/gas\\_station\\_hra.pdf](http://www.aqmd.gov/docs/default-source/planning/risk-assessment/gas_station_hra.pdf).

Guidance on Siting Sensitive Receptors Near a High-Volume Freeway and 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 SCAQMD to reduce community exposure to source-specific and cumulative air pollution impacts, SCAQMD adopted the *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning* in 2005<sup>2</sup>. Additionally, the California Air Resources Board’s (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective* recommends avoiding siting residences within 300 feet of a large gas station or 50 feet for a typical gas station. These Guidance documents provide recommended 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.

Pursuant to California Public Resources Code Section 21092.5 and CEQA Guidelines Section 15088, SCAQMD staff requests that the Lead Agency provide the SCAQMD with written 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 air quality questions that may arise from this comment letter. Please contact Ryan Bañuelos, Air Quality Specialist, CEQA Section, at (909) 396-3479, if you have any questions.

Sincerely,

*Lijin Sun*

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<sup>1</sup> Caltrans 2015 Annual Average Daily Truck Traffic on the California State Highway System.

[http://www.dot.ca.gov/trafficops/census/docs/2015\\_aadt\\_truck.pdf](http://www.dot.ca.gov/trafficops/census/docs/2015_aadt_truck.pdf).

<sup>2</sup> South Coast Air Quality Management District. May 2005. “Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning” Accessed at: <http://www.aqmd.gov/home/library/documents-support-material/planning-guidance/guidance-document>