



South Coast Air Quality Management District

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Review of the Draft Los Angeles County Housing Element, 2014-2021

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 document as appropriate.

The overall purpose of the Los Angeles County Housing Element (project) is to provide a policy guide to address the comprehensive housing needs of the county's unincorporated areas. An important goal of the housing element (Goal 5 identified on page 12) is to provide neighborhoods that "...protect health, safety, and welfare of the community." Therefore, SCAQMD staff recommends that the lead agency incorporate additional policy and discussion into the project that addresses health and safety concerns resulting from potentially poor air quality along segments of major transportation corridors in the project area. The details regarding this recommendation are provided below.

Health Risk Impacts to Future Residents

Upon review of the proposed project the SCAQMD staff is concerned about land use compatibility based on the project site inventory in Appendix A of the Draft Housing Element. Specifically, SCAQMD staff is concerned that placing additional housing (i.e., sensitive land uses¹) in close proximity to major transportation corridors such as the 110 Freeway, 60 Freeway and 5 Freeway could result in elevated health risk impacts to future residents from toxic air contaminants (TACs) generated by high levels of vehicle activity including diesel trucks. As the lead agency is aware the California Air Resources Board (CARB) identified PM from diesel-fueled engines as a TAC in 1998, following an exhaustive 10-year scientific assessment process. In addition, as part of the identification

¹ 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>

process, the Office of Environmental Health Hazard Assessment (OEHHA) evaluated the potential for diesel exhaust to affect human health. OEHHA found that exposure to diesel PM resulted in an increased risk of cancer and an increase in chronic non-cancer health effects including a greater incidence of cough, labored breathing, chest tightness, wheezing, bronchitis, and asthma. Further, there are a number of studies that show a correlation of adverse health impacts and proximity to roadways. CARB recommends avoiding placing new sensitive land uses within 500 feet of roads that generate traffic volumes exceeding 100,000 vehicles/day.

SCAQMD Staff Recommendations

Given that housing and many amenities associated with housing/residential development such as parks are considered sensitive land uses the SCAQMD staff recommends that the lead agency provide additional information about the level of diesel truck activity in areas surrounding future residential sites. Further, the SCAQMD recommends that the lead agency incorporate additional policy in Goal 5 that precludes residential development within 500 feet of roads with 100,000 vehicles/day (i.e., consistent with the CARB recommendation mentioned above). Based on a review of the housing site inventory provided to SCAQMD staff by the lead agency it appears to be feasible to incorporate such policy given that there is a surplus of about 20,000 units for future residential development and only 2,500 of those units are within 500 feet of a freeway.

In the event that the lead agency determines that it is not feasible to incorporate policy that precludes residential development within 500 feet of roads exceeding 100,000 vehicles/day the lead agency should quantify the health effects from diesel PM in the environmental document prepared for the proposed project. There are a variety of air dispersion models available, including but not limited to, CAL3QHCR and AERMOD to conduct air dispersion modeling of mobile source emissions. Additional information on these models can be obtained at: www.epa.gov/scram001/dispersion_prefrec.htm. Further, there are several guidance documents available for air dispersion modeling and HRAs. The SCAQMD's recommended threshold for cancer risk should not exceed 10 in one million at any receptor location, when compared to the pre-project risk. Below is a discussion to assist the lead agency in developing a HRA for the proposed project.

HRA Guidance

The SCAQMD's Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis and be found at: http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.htm. Also, both Ports of Los Angeles and Long Beach have SCAQMD approved HRA protocols, ARB has air dispersion guidance in Appendix 7 of the Diesel Risk Reduction Plan, which, can be found at: <http://www.arb.ca.gov/diesel/documents/rrpapp.htm>, and HARP can be downloaded from the ARB website at: <http://www.arb.ca.gov/toxics/harp/harp.htm>. Further, the California Air Pollution Control Officers Association has prepared guidance for health risk assessments available at: http://www.capcoa.org/wp-content/uploads/2012/03/CAPCOA_HRA_LU_Guidelines_8-6-09.pdf.

Contact Information

The SCAQMD staff requests that the lead agency provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the final project. Further, staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,



Ian MacMillan

Program Supervisor, CEQA Inter-Governmental Review
Planning, Rule Development & Area Sources

IM:DG

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