



# South Coast Air Quality Management District

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## **Review of the Draft Mitigated Negative Declaration (Draft MND) for the Proposed West 17<sup>th</sup> Street and Superior Avenue Live/Work 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 environmental document as appropriate.

Based on a review of the Draft MND the proposed project will place sensitive land uses<sup>1</sup> (e.g., residential land uses) in close proximity to light industrial land uses. Specifically, the Lead Agency determined that with the inclusion of the Mitigation Measure AQ-1 (MM AQ-1) the proposed project will result in less than significant health risk impacts. However, it does not appear that the Lead Agency quantified the potential health risk impacts to future sensitive receptors from operational activities occurring on these industrial sites nor did the Lead Agency quantify the effectiveness of MM AQ-1. As a result, SCAQMD staff is concerned that the lead agency has not demonstrated less than significant health risk impacts to future sensitive receptors at the project site. Therefore, the SCAQMD staff recommends that the Lead Agency quantify the project's potential health risk impacts and compare the results to the SCAQMD's California Environmental Quality Act (CEQA) CEQA significance thresholds<sup>2</sup> and make a significance determination .

### **Toxic Air Contaminants and Health Risk Assessment**

The Draft MND discussed the results of the MATES studies and listed light industrial and commercial facilities surrounding the project site. However, the Lead Agency did not analyze the TAC emission impacts from these facilities surrounding the proposed project. Further, the Lead Agency determined that health risk impacts from potential

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<sup>1</sup> 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>

<sup>2</sup> SCAQMD CEQA Significance Thresholds are available at:  
<http://www.aqmd.gov/ceqa/handbook/signthres.pdf>

TAC emissions will be mitigated to an insignificant level with the inclusion of MM AQ-1; however, the Lead Agency did not quantify the effectiveness of this measure. Therefore, SCAQMD staff recommends that the Lead Agency identify existing TACs from facilities surrounding the project site and determine the potential health risk impacts from these TACs in the final environmental document as appropriate. Also, the health risk impacts from vapor intrusion identified in Appendix B (Hazardous Materials Documentation) should be included in the health risk analysis of offsite TAC sources.

#### Health Risk Mitigation Measures

If upon revision of the air quality analysis the Lead Agency determines that the project will result in significant health risk impacts SCAQMD staff recommends that the Lead Agency provide additional mitigation measures to minimize resident's exposure to these emissions. For example, the Lead Agency should consider a design configuration that provides a maximum setback for individual housing units, such as, place parking on the south side of the project site and place individual housing units and tot lots on the north end of the site furthest from facilities that are significant sources of TACs.


Further, the lead agency should revise MM AQ-1 to include following:

- a. Specific conditions to ensure that high efficiency filters will continue to be maintained and replaced for the life of the project (e.g., through a provision in the covenants, conditions and restrictions, CC&Rs), and
- b. Consider maintaining positive pressure with the building's filtered ventilation system in living spaces to reduce infiltration of unfiltered outdoor air.

#### Contact Information

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



*for* Ian MacMillan  
Program Supervisor, Inter-Governmental Review  
Planning, Rule Development & Area Sources

Attachment

MK:DG

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