



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178

(909) 396-2000 • www.aqmd.gov

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jpool@planning.lacity.org

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Mr. Jeffery Pool
Los Angeles City Planning Department
200 N. Spring Street, 7th Floor
Los Angeles, CA 90012

Review of the Mitigated Negative Declaration ENV-2013-3642 for 1900 South Sawtelle Blvd, 11274 West Missouri Avenue, West Los Angeles

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The initial study included with the Mitigated Negative Declaration (MND) states that “the proposed project is located within 1,000 feet of a freeway, which could expose residence to pollutants due to existing ambient air pollution in the vicinity, but the Mitigation Measure will reduce impacts to a less than significant level.” However, it is unclear if the mitigation measures listed in the MND to mitigate emissions from the freeway are sufficient to reduce risks to levels below SCAQMD significance thresholds. The lead agency should conduct a health risk assessment (HRA) to determine both the baseline risk and the mitigated risk prior to determining if the proposed mitigation will sufficiently alleviate the identified significant impact.

Numerous health studies have demonstrated the potential adverse health effects of living near highly travelled roadways. As a result of these studies, in 2005 the California Air Resources Board recommended avoiding siting housing within 500 feet of a freeway in their Land Use Handbook.¹ Since that time, additional research has continued to build the case that the near roadway environment 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 emerging.²

While the health science behind recommendations against placing new homes close to freeways is clear, SCAQMD staff recognizes the 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 health risks involved it is critical that any proposed mitigation

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>

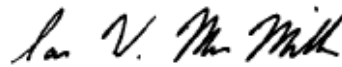
² See Chapter 9 of the 2012 AQMP for further information (<http://www.aqmd.gov/aqmp/2012aqmp/Final-February2013/Ch9.pdf>)

must be carefully evaluated prior to determining if those health risks would be brought below recognized significance thresholds.

Finally, the lead agency should consider the limitations of the proposed mitigation for this project (enhanced filtration) on housing residents. For example, in a study that SCAQMD conducted to investigate filters³ similar to those proposed for this project, 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. The proposed mitigation assumes that the filters operate 100 percent of the time while residents are indoors. These filters also have no ability to filter out any toxic gasses from vehicle exhaust. The presumed effectiveness and feasibility of this mitigation should therefore be evaluated in more detail prior to assuming that it will sufficiently alleviate near roadway exposures.

We appreciate your willingness to consider these comments and would appreciate a response prior to the lead agency making any decision on this project. In addition, should this project move forward, please send us any CEQA documentation consistent with regulatory requirements and prior to project approval if a comment period is not required. Should you have any questions, don't hesitate to contact James Koizumi at (909) 396-3234.

Sincerely,



Ian MacMillan

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

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³ <http://www.aqmd.gov/rfp/attachments/2010/AQMDPilotStudyFinalReport.pdf>. This study evaluated filters rated MERV 13+ while the proposed mitigation calls for less effective MERV 11 filters.