



South Coast Air Quality Management District

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Draft Environmental Impact Report (Draft EIR) for the Proposed Agoura Equestrian Estates Project (SCH NO. 2014061063)

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 CEQA document.

The project description includes development of an approximately 71-acre site to construct 15 residential single-homes on 15 separate lots. Two additional lots will be dedicated to open space. Soil disturbance is estimated to affect approximately 22 acres with the remaining 49-acres dedicated to open space. The project site is bordered on the west by low-density single-family homes and high-density residences nearer to the U.S. 101 Freeway (US-101). US-101 is just south of the project site and the Santa Monica Mountains are located north and east of the project site.

The proposed project is planned to be completed in two phases. Phase 1 includes grading for construction of infrastructure, e.g., a private access road, debris detention basins, drainage improvements, trails, fencing, etc., and the grading of Lot 1, a single residential lot located in the northeast portion of the project site. The grading occurring on Lot 1 will increase the height of the grading area allowing project soil disturbance to be balanced on-site. Phase 1 activities would include a total of 5,012 cubic yards of cut and fill. Existing sensitive receptors (residencies located just west of Lot 1) are as close as 50 feet from the proposed soil disturbance areas.

Phase 2 soil disturbance includes grading of 15 separate lots for the long-term construction of 15 single-family residences. Cut and fill activities will include a total of 23,160 cubic yards of soil. The proposed site plan includes an alternative that would place future residents adjacent to the U.S. 101 Freeway (US-101).

Siting of Sensitive Receptors Near a Freeway

Under Alternative 3, the project shows that some of the proposed project residential sites would be placed next to the US 101 Freeway (Freeway), which has a daily traffic volume of 179,000 vehicles including vehicles that are diesel fueled. As a result, these sensitive receptors (future residents) could be exposed to a potentially significant source of toxic emissions including Toxic Air Contaminants (TAC) due to existing ambient air pollution in the vicinity. Because numerous health studies have demonstrated the potential adverse health effects of living near highly travelled roadways, the California Air Resources Board (CARB) recommends avoiding siting housing within 500 feet of a freeway in their Land Use Handbook (April, 2005).¹ Additional research has continued to support 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

If residents will be located within 500 feet of the freeway, the SCAQMD staff recommends that the Final EIR include an analysis to disclose health risk impacts to future residents consistent with the SCAQMD's recommended methodology³ and applicable CEQA significance threshold for cancer risk impacts.⁴ If the analysis demonstrates significant health risk impacts, the Lead Agency should provide mitigation pursuant to Section 15126.4 of the CEQA Guidelines.

Localized Significance Thresholds

Finally, it is recommended that the lead agency evaluate localized air quality impacts since it is noted on page 17 of the Initial Study, in Figure 2-2 and upon an aerial map inspection, the proposed project is located within one-quarter mile of sensitive receptors (residences) west and southwest of the proposed project (50 feet in some instances). The Lead Agency is reminded that the fugitive dust and equipment emissions occurring during construction, for example during Phase 1, would create localized impacts to the residents located as close as 50 feet from the construction activities occurring during on Lot 1 during Phase 1. In addition, other localized impacts would occur during the grading of pads during Phase 2 that would potentially impact residents bordering the project site to the west. Therefore, the SCAQMD requests that the lead agency evaluate localized air quality impacts to ensure that any nearby sensitive receptors are not adversely affected by the construction activities that are occurring in close proximity. SCAQMD guidance for performing a localized air quality analysis can also be found at

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 at: [http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2012-air-quality-management-plan/final-2012-aqmp-\(february-2013\)/chapter-9-final-2012.pdf](http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2012-air-quality-management-plan/final-2012-aqmp-(february-2013)/chapter-9-final-2012.pdf) .

³ The SCAQMD Mobile Source HRA Guidance is available at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis> http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html .

⁴ SCAQMD Air Quality Significance Thresholds for emissions including Toxic Air Contaminants: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook> .

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the SCAQMD website.⁵ Should the Lead Agency conclude after its analysis that construction or operational localized air quality impacts exceed the SCAQMD daily significance thresholds, staff has compiled mitigation measures in addition to those measures listed on page 18 of the Draft EIR that can be implemented if the air quality impacts are determined to be significant.⁶

Pursuant to Public Resources Code Section 21092.5, 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 EIR. Further, staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist CEQA Section, at (909) 396-3302 if you have any questions regarding the enclosed comments.

Sincerely,

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⁵ <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>

⁶ <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>