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Draft Mitigated Negative Declaration (Draft MND) for the Proposed 333, 359, 363 N La Fayette Park Pl; Silver Lake- Echo Park – Elysian Valley (ENV-2016-887)

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 MND.

The Lead Agency proposes to demolish the existing residential dwellings and construct nine small lot homes. The proposed residences will be sited approximately 500 feet south of the Highway 101[1], which has an average daily traffic volume of 263,000 vehicles and that includes more than 10,627 diesel trucks. Because of the close proximity to the existing freeway, residents would be exposed to diesel particulate matter, which is a toxic air contaminant and a carcinogen. The SCAQMD staff therefore recommends that the Lead Agency conduct a mobile source health risk assessment (HRA)[2] to disclose the potential health risks to the residents from vehicles that use the freeway including diesel-fueled vehicles that emit diesel particulate matter.

Numerous health studies have demonstrated potential adverse health effects associated with living near highly travelled roadways. As a result of these studies, the California Air Resources Board (CARB) developed a Land Use Handbook[3] that recommends avoiding the siting of housing within 500 feet of a freeway. Additional research has shown that the near roadway environment also 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[4].

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1 Aerial map inspection.
2 "Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis" Accessed at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis
3 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
4 See Chapter 9 of the 2012 AQMP for further information. Accessed at: http://www.aqmd.gov/aqmp/2012aqmp/Final-February2013/Ch9.pdf

While the health science behind recommending against placing new homes in close proximity to freeways is clear, SCAQMD staff recognizes that there are 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, sounds walls, vegetation barriers, etc. However, because of the potential adverse health risks involved with siting housing near a freeway, it is essential that any proposed mitigation must be carefully evaluated in order to determine if those health risks would be brought below recognized significance thresholds.

The SCAQMD staff is available to work with the Lead Agency to address these concerns and any other air quality questions that may arise. Please contact Jack Cheng, Air Quality Specialist at (909) 396-2448, if you have any questions regarding these comments. We look forward to reviewing and providing comments for the Final MND associated with this project.

Sincerely,

Barbara Radlein

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