



# South Coast Air Quality Management District

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## **Review of the Draft Mitigated Negative Declaration (Draft MND) for the Slover Avenue Improvements Project**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are intended to provide guidance to the lead agency and should be incorporated into the revised Draft or Final Mitigated Negative Declaration (Draft or Final MND) as appropriate.

The proposed project includes the construction of one to two additional traffic lanes or traffic lane infill for a total of four lanes resulting in an overall increase in vehicle capacity on Slover Avenue. Also, according to Table 2 (Surrounding Land Use) and Figure 2 (Vicinity Location) the proposed project area is surrounded by sensitive land uses (i.e., residential uses). Given the increase in vehicle capacity on Slover Avenue and the sensitive land uses surrounding the proposed project site SCAQMD staff is concerned that the proposed project could expose sensitive receptors to substantial pollutant concentrations creating potentially significant health risk impacts.

Recent research has revealed that pollutants found in close proximity to roadways are associated with a variety of adverse health effects, independent of regional air quality impacts<sup>1</sup>. These can include reduced lung capacity and growth<sup>2</sup>; cardiopulmonary disease<sup>3</sup>; increased incidence of low birth weight, premature birth, and birth defects<sup>4</sup>; and exacerbation of asthma<sup>5</sup>. In order to address air quality issues such as these that are

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<sup>1</sup> "Special Report 17. Traffic-related air pollution: A critical review of the literature on emissions, exposure, and health effects". Health Effects Institute, May 2009; 394 p.

<sup>2</sup> "Effect of exposure to traffic on lung development from 10 to 18 years of age: a cohort study". Gauderman WJ et al., Lancet, February 2007; 369 (9561): 571-7.

<sup>3</sup> "Exposure to traffic and the onset of myocardial infarction". Peters A et al., The New England Journal of Medicine, 351(17):1721-1730

<sup>4</sup> Ritz B, et al. 2002 Ambient air pollution and risk of birth defects in Southern California. Am J Epidemiology, 155:17-25

<sup>5</sup> McConnell R, et al. 2006. Traffic, susceptibility, and childhood asthma. Environ Health Perspectives 114(5):766-72

related to incompatible land uses, the California Air Resources Board published its Air Quality and Land Use Handbook: A Community Perspective (CARB Land Use Handbook)<sup>6</sup>. The CARB Land Use Handbook recommends avoiding siting sensitive land uses within 500 feet of high traffic roads.

Given these findings, SCAQMD staff strongly recommends that, prior to finalizing the CEQA process for this project, the lead agency evaluate the potentially significant impact of exposing sensitive receptors to these substantial pollutant concentrations. If these impacts are found to be significant, all feasible mitigation measures should be considered to reduce these impacts. Mitigation measures to reduce air quality impacts from the operation phase of the project can be found at the following web address:

[http://www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html)

Please provide the SCAQMD with written responses to the above comments prior to the adoption of the Final MND. 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

Attachment

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<sup>6</sup> <http://www.arb.ca.gov/ch/handbook.pdf>