



South Coast Air Quality Management District

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Draft Mitigated Negative Declaration (Draft MND) **for the Proposed First Street Village**

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.

Project Description

The Lead Agency proposes demolition of 16 one-story commercial buildings followed by new development that will be constructed in three phases over an approximately four-year period. The Lead Agency proposes development of 3, five-story buildings for mixed residential and retail/commercial uses with parking provided in 3, five-level subterranean garages. The development would provide a combined total of 261 apartments, 21,265 square feet of retail/commercial space on the ground floors, and a total of 673 parking spaces located in underground garage structures.

The proposed project site is located less than five hundred feet of the Interstate-5 Freeway (I-5 Freeway). Project residents would be living adjacent to the freeway, which has a peak daily traffic volume of 226,000 vehicles, which includes 15,752 diesel trucks.¹ Because of the close proximity to the existing freeway, residents would be exposed to diesel particulate matter, which the California Air Resources Board (CARB) has determined to be carcinogenic and a toxic air contaminant.

¹ <http://traffic-counts.dot.ca.gov/> California Dept. of Transportation 2014 Traffic Volumes (I-5 at Olive Avenue) and 2014 Truck Traffic (I-5 at Jct. Rte. 134).

Health Risk Assessment

Based on the Lead Agency's estimates,² the proposed mitigation would not reduce cancer risk exposure to the prospective residents from the freeway vehicles emitting toxic air contaminants below the SCAQMD recommended significance threshold for residential Maximum Incremental Cancer Risk (MICR).³ Therefore, the cancer risk to the proposed project residents still remains a significant impact.

Limits to Enhanced Filtration Units

In the Draft MND, a Heating, Ventilating and Air Conditioning (HVAC) system with the enhanced Maximum Efficiency Reporting Value (MERV) filtration would be installed in the residential units to reduce exposure to particulate matter coming from the existing ambient air environment, mainly from vehicles operating on the adjacent freeway. Because of the limitations of the proposed HVAC system using the MERV filters, the Lead Agency should consider the limitations of the proposed mitigation for the project residents. For example, in a study that SCAQMD conducted to investigate filters 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. Further, the proposed mitigation also assumes that the MERV filters operate 100 percent of the time while residents are indoors. Finally, these filters also have no ability to filter out any toxic gasses from vehicle exhaust. Therefore, the presumed effectiveness and feasibility of this mitigation should be evaluated in more detail prior to assuming that it will sufficiently alleviate near roadway exposures.

CARB Advisory Guidance Recommendation to Avoid Siting Housing Near a Freeway

Numerous health studies have demonstrated the potential adverse health effects of living near highly travelled roadways. As a result of these studies, the California Air Resources Board recommended in 2005 avoiding the siting of sensitive receptors such as housing within 500 feet of a freeway in their Land Use Handbook.⁴ Since the time of that study, additional research has continued to build the case 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.⁵

While the health science behind recommendations against placing sensitive receptors close to freeways is clear, SCAQMD staff recognizes the many factors Lead Agencies must consider when siting uses such as the new residences. 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

²DMND, Table 3-8 Reduced Cancer Estimated Inhalation Cancer Risk (Risk Per Million)

³ The SCAQMD recommended threshold for MICR is greater than 10 in one million cases.

⁴ 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>

⁵ See Chapter 9 of the 2012 AQMP for further information

Accessed 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) .

critical that any proposed mitigation must be carefully evaluated prior to determining if those health risks would be brought below recognized significance thresholds.

Compliance With SCAQMD Rule 1166 During Soil Disturbance Activities

Should the Lead Agency encounter VOCs during potential soil disturbance activities including the excavation of the parking garage, the Final MND should describe how the Lead Agency will comply with SCAQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil due to the potential of encountering VOCs during soil disturbance activities described in the project description.

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. The SCAQMD 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 these comments.

Sincerely,

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JW:GM

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