



South Coast  
Air Quality Management District  
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**Draft Mitigated Negative Declaration (Draft MND) for the Proposed  
18535 W Burbank Blvd; Encino-Tarzana (ENV-2016-1052)**

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 project proposes to construct 14-unit multi-family apartment.

Health Risk Assessment

The proposed residences will be sited approximately 80 feet south of US-101 Freeway<sup>1</sup>. Highway 101 has an average daily traffic volume of 220,000 vehicles which includes more than 12,100 diesel trucks. 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<sup>2</sup> 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<sup>3</sup>.

Additionally, the proposed project will also be sited approximately 80 feet west of a gasoline dispensing station. Because of the close proximity to the existing fueling station, residents would be exposed to benzene, which is a toxic air contaminant. CARB's Land Use Handbook also recommends avoiding the siting of housing within 300 feet of a large fueling station.

The Draft MND includes mitigation requiring Minimum Efficiency Reporting Value (MERV) 11 air filtration systems, but there is no discussion of how this mitigation impacts the potential project adverse air quality and health affect impacts from the freeway. The Final MND should show clearly disclose the unmitigated and mitigated (using the effectiveness of the proposed mitigation) results and compare them to the CEQA significance thresholds. Those results should be included in the Final MND in order to demonstrate the Lead Agency's determination that potential adverse air quality impacts from the freeway traffic and gasoline station to potential residents are less than significant.

The SCAQMD staff therefore recommends that the Lead Agency conduct a health risk assessment (HRA) to disclose the potential health risks to the residents from the freeway and gasoline dispensing station.

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<sup>1</sup> Aerial map inspection.

<sup>2</sup> 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>

<sup>3</sup> See Chapter 9 of the 2012 AQMP for further information. Accessed at: <http://www.aqmd.gov/aqmp/2012aqmp/Final-February2013/Ch9.pdf>

Guidance for performing a mobile source health risk assessment (“Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis”) can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>

Guidance for performing a gasoline dispensing station health risk assessment (“*Risk Assessment Procedures – Appendix X*”) can be found at: <http://www.aqmd.gov/docs/default-source/planning/risk-assessment/riskassprocjune15.pdf>.

### Limitations to the Effectiveness of Filters as Mitigation

The Lead Agency proposes to install an air filtration system using filters that meet at least the MERV 11 standard to minimize freeway dust impacts to future residents. The use of the proposed air filters as mitigation, however, has limitations. It should be noted that these filters have no ability to filter out any toxic gasses from vehicle exhaust and residents will not be protected outside of their homes while relaxing outside, playing in a common area, washing a vehicle or when the windows or doors are open. Further, the heating, ventilation and air conditioning (HVAC) system and as well as the filters have to be serviced/replaced as required by manufacturer recommendations with annual replacement costs expected to range from \$120 to \$240 to replace each filter<sup>4</sup>. Adequate pressure must also be maintained within the residences and it is assumed that the filters will operate 100 percent of the time while residents are indoors.

While the health science behind recommendations against placing new residences 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 the building filtration systems, construction of sound walls, vegetation barriers, etc. However, because of the potential health risks involved it is critical that any proposed mitigation must be carefully evaluated prior to determining 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

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<sup>4</sup> <http://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf?sfvrsn=0>. This study evaluated filters rated MERV 13+ while the proposed mitigation calls for less effective MERV 12 or better filters. See also CARB link for the “Status of Research on Potential Mitigation Concepts to Reduce Exposure to Nearby Traffic Pollution” (August 23, 2012): [http://www.arb.ca.gov/db/search/search\\_result.htm?q=Potential+Mitigation+Concepts+to+Reduce+Exposure+to+Nearby+Traffic+Polltion&which=arb\\_google&cx=006180681887686055858%3Abew1c4wl8hc&srch\\_words=&cof=FORID%3A11](http://www.arb.ca.gov/db/search/search_result.htm?q=Potential+Mitigation+Concepts+to+Reduce+Exposure+to+Nearby+Traffic+Polltion&which=arb_google&cx=006180681887686055858%3Abew1c4wl8hc&srch_words=&cof=FORID%3A11).