



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

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Ms. Jennifer Le
Planning Division
City of Orange
300 East Chapman Avenue
Pasadena, CA 92866

**Draft Mitigated Negative Declaration Draft MND) No. ENV 1822-09 for the
Proposed City of Orange 2006-2014 Housing Element (General Plan Amendment
No. 2009-05)**

The South Coast Air Quality Management District (SCAQMD) 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 Mitigated Negative Declaration.

In the Draft Mitigated Negative Declaration (Draft MND), the lead agency is updating its existing and future housing needs through 2014 in the proposed 2006-2014 Housing Element Update. The California Air Resources Board (CARB) has published the "Air Quality and Land Use Handbook: A Community Health Perspective (April 2005)." This document is intended to serve as a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. The SCAQMD recommends that the lead agency review the Handbook guidelines while completing the housing element update and consider the recommendations that apply to the siting of residential sensitive receptors.

Specifically, the Handbook recommends avoiding siting new sensitive land uses (such as residences) within 500 feet of a freeway, defined as urban roads with 100,000 vehicles daily or rural roads with 50,000 vehicles per day. The Air Quality and Land Use Handbook: A Community Health Perspective is available at the following website: <http://www.arb.ca.gov/ch/landuse.htm>.

Recent research has revealed that pollutants found in close proximity to freeways are associated with a variety of adverse health effects, independent of regional air quality impacts¹. These can include reduced lung capacity and growth²; cardiopulmonary disease³; increased incidence of low birth weight, premature birth, and birth defects⁴; and exacerbation of asthma⁵.

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. The SCAQMD staff would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist, Inter-Governmental Review, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,



Ian MacMillan
Program Supervisor, Inter-Governmental Review
Planning, Rule Development & Area Sources

Attachment

IM:GM

ORC100106-02
Control Number

¹ “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.

² “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.

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

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

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