



South Coast Air Quality Management District

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30111 Crown Valley Parkway
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Draft Mitigated Negative Declaration (Draft MND) for the Proposed Site Development Plan Permit SP 12-07

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 71 small lot homes.

The proposed residences will be sited approximately 450 feet west of Interstate 5 (I-5) freeway¹. The I-5 freeway has an average daily traffic volume of 278,500 vehicles which includes more than 11,084 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 Handbook² 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 emerging³.

Furthermore, the proposed site is located west of railroad tracks operated by the Southern California Regional Rail Authority (Metrolink). A federal database⁴ indicates that these railroad tracks show daily train activity with approximately 45 trains powered by diesel-fueled locomotive engines. Because of the close proximity to the existing freeway and railroad tracks, residents would be exposed to diesel particulate matter emitted from diesel powered engines (such as trucks and locomotives), which is a toxic air contaminant and a carcinogen.

Lastly, the proposed project will also be sited to the southwest of a fuel dispensing station at an automotive dealership. 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.

¹ Aerial map inspection.

² 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>

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

⁴ <http://safetydata.fra.dot.gov/OfficeofSafety/publicsite/crossing/xingqryloc.aspx>

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, railroad tracks, and gasoline dispensing station.

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>.

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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