



January 7, 2008

Mayor Heather Fargo and City Council Members
Fax number: 264-7680

Dear Mayor Fargo and Council members:

We are writing on behalf of the Coalition for Clean Air, the Planning and Conservation League, and the American Lung Association of California to express serious concerns about the current Greenbriar development project you are considering this month. Our primary air quality concern with the project is that residences would be built within 500 feet of the freeway which the California Air Resources Board's Air Quality and Land Use Handbook clearly recommends not be done.

After many years of criticism for not providing adequate information to local land use agencies the California Air Resources Board invested a lot time and resources to create an Air Quality and Land Use Handbook which published in 2005. Per the Executive Summary of the Handbook,

"The Air Resources Board's (ARB) primary goal in developing this document is to provide information that will help keep California's children and other vulnerable populations out of harm's way with respect to nearby sources of air pollution. Recent air pollution studies have shown an association between respiratory and other non-cancer health effects and proximity to high traffic roadways. Other studies have shown that diesel exhaust and other cancer-causing chemicals emitted from cars and trucks are responsible for much of the overall cancer risk from airborne toxics in California...

Focusing attention on these siting situations is an important preventative action. ARB and local air districts have comprehensive efforts underway to address new and existing air pollution sources under their respective jurisdictions. The issue of siting is a local government function. As more data on the connection between

proximity and health risk from air pollution become available, it is essential that air agencies share what we know with land use agencies...”

In Table 1.1 of the Handbook, CARB makes the following specific recommendation:

**Recommendations on Siting New Sensitive Land Uses
Such As Residences, Schools, Daycare Centers, Playgrounds, or Medical
Facilities***

Source Category	Advisory Recommendations
Freeways and High-Traffic Roads	<ul style="list-style-type: none">• Avoid siting new sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day.

Numerous studies in recent years have found adverse health impacts from living or attending school close to freeways or other high-traffic roads. The health impacts include decreased lung function, exacerbated asthma, and premature death. The CARB Handbook summarizes the recent health findings as follows:

Key Health Findings

- Reduced lung function in children was associated with traffic density, especially trucks, within 1,000 feet and the association was strongest within 300 feet. (Brunekreef, 1997)
- Increased asthma hospitalizations were associated with living within 650 feet of heavy traffic and heavy truck volume. (Lin, 2000)
- Asthma symptoms increased with proximity to roadways and the risk was greatest within 300 feet. (Venn, 2001)
- Asthma and bronchitis symptoms in children were associated with proximity to high traffic in a San Francisco Bay Area community with good overall regional air quality. (Kim, 2004)
- A San Diego study found increased medical visits in children living within 550 feet of heavy traffic. (English, 1999)

As air pollution from freeway traffic is high enough to cause health impacts within 1000 feet of freeways, we believe CARB could have recommended against any residential development within this range. CARB however decided to take a more conservative approach and limited their recommendation for not siting residences to 500 feet.

For these reasons we urge you not to approve this project in its current form or any other project that proposes to build residences within 500 feet of a major freeway.

Sincerely,

Tim Carmichael
Coalition for Clean Air

Gary Patton
Planning and Conservation League

Bonnie Holmes Gen
American Lung Association of California

cc:

Larry Greene, Sacramento Metropolitan Air Quality Management District
Mary Nichols, Chair, California Air Resources Board
James Goldstene, Executive Officer, California Air Resources Board
Joan Denton, Director, Office of Environmental Health Hazard Assessment
Ray Kerridge, City Manager