

## Jessica Lynch

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**Sent:** Thursday, July 1, 2021 4:36 PM  
**To:** Jessica Lynch  
**Subject:** Comment on Draft Housing Element

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Greetings,

This comment is in relation to Appendix C. Parcels 3, 4, and 5 in Table 2 and Figure 1 are located adjacent to the freeway. I am urging that these site be removed from consideration for rezoning to high density residential use because of potential health risks associated with poor air quality.

For many years (reference at the end), the CA Air Resources Board has recommended against placing so-called “sensitive land uses” (which includes residential) too close to freeways. Specifically, CARB advises to avoid siting residential uses within 500 feet of freeways or urban roads with 100,000 vehicles/day (I-80 exceeds this threshold). The reason, of course, is potential health issues associated with degraded air quality, including higher cancer risks (particularly within 300 ft. of the roadway); respiratory symptoms, asthma exacerbations, and decreases in lung function in children; and possibly premature death in elderly individuals with heart disease.

You can peruse the CARB report itself for more details regarding specific health concerns. However, a nice summary of its position follows:

“Land use policies and practices can worsen air pollution exposure and adversely affect public health by mixing incompatible land uses. Examples include locating new sensitive land uses, such as housing or schools, next to small metal plating facilities that use a highly toxic form of chromium, or very near large industrial facilities or freeways. Based on recent monitoring and health-based studies, we now know that air quality impacts from incompatible land uses can contribute to increased risk of illness, missed work and school, a lower quality of life, and higher costs for public health and pollution control.” (page 38, emphasis added)

Of course, CARB points out that these are recommended guidelines and that local agencies have the authority to decide otherwise. However, consigning low income housing to unhealthy sites is the classic environmental justice issue. I’m asking that we not create such an injustice here.

For CARB, commercial is not classified as a sensitive land use. People spend less time at work; work activities are likely to be indoors where the air can be filtered; and there are no children or elderly involved. Thus, the current zoning is appropriate.

CA Air Resources Board: Air Quality and Land Use Handbook: A Community Health Perspective, April 2005, <https://ww3.arb.ca.gov/ch/handbook.pdf>).

John Johnston