Local Government Perspectives on Siting Criteria for Localized Air Pollution Sources

“How do cities balance the goals of creating housing and employment opportunities, revitalizing abandoned and neglected former industrial and strip-commercial sites, reduce traffic congestion, improve the over-all quality of life in the community, with the goals of eliminating community exposure to source-specific and cumulative air pollution impacts?”

Constraints

• Cities face a variety of competing priorities and policies. Reducing air quality impacts is one of many.
• Past planning and development practices are difficult to correct – especially in developed urban areas.
  For example, Interstate Highway System came into being in the 1950’s – two decades before NEPA and CEQA review. Highways were cut through residential neighborhoods, parks, schools and other sensitive land uses.
• There has been silent transformation of the regional and state economy – to trade dependency – with the attendant port, rail, highway, warehousing and employment growth.
Constraints

- The Housing Crisis is real. The State is in the 12th consecutive year of under-producing housing, with a shortage of 100,000 units yearly statewide.
- It is extremely difficult to find “infill housing” sites in urban areas. Developers are forced by the economics of land prices to concentrate on “brownfields” and former “strip-commercial” areas.
- These are the same areas that cities need to revitalize.
- The jobs-housing imbalance is real. Californian’s are find affordable housing on the urban fringes, spending hours commuting to work.

Localized Sources of Air Pollution and Sensitive Sites Are Diverse and Widespread Over the Urban Landscape

- ARB list hundreds of uses as having the potential to create localized air pollution – shopping centers, schools, universities, airports, ports, freeways, rail yards and warehouses.
- Commercial and industrial uses include dry cleaners, gas stations, auto body shops, furniture repair, assembly plants, welders, metal spray, chemical producers and assembly plants.
- ARB lists housing, schools, day care centers, playgrounds, hospitals, youth centers and elder care centers as sensitive uses.
  - All of these are intertwined in the existing urban setting.
Distance Recommendations Could Render Miles of Urban Areas Unusable for Housing or Business Development

- **Source**
  - Rail Yard
  - Intermodal Facility
  - Ports
  - Roadways (Trucks)
  - Truck Stop
  - Cold Storage
  - Chrome platers
  - Freeways

- **Distance**
  - 1 mile
  - 1 mile
  - 1 mile
  - 1000 feet
  - 1000 feet
  - 1000 feet
  - 500 feet
  - 500 feet

Practicality and Costs of Mitigations Must Be Weighed

- Limit Mixed Use Housing
- Limit Housing Adjacent to Rail
- Limit Housing Adjacent to Highways
- Construct alternative truck routes
- Creation of open space zones
- Prohibition of housing “downwind” of industrial areas
- Prohibit truck idling at supermarkets
- Limit the amount of gasoline sold in mixed-use developments
- Install landscaping at construction sites prior to grading
- Require businesses to purchase low emission vehicles as part of approvals
- Enhance building ventilation and filtering systems in schools and senior care centers.
Recommendations

- The constraints and opportunities for newly developing areas are different from urban “infill” areas.
- It will be difficult to develop guidelines for “infill” development – flexibility, time and incentives will be required.
- The ARB will have to balance air guidelines with the need to develop housing – especially affordable housing. The ARB should not adopt guidelines that work against key State and local government goals.
- Brownfields, marginal industrial and strip-commercial sites represent a tremendous opportunities to construct housing and revitalize communities. The guidelines need to recognize this opportunity.
- The cost and practicality of the guidelines must be measured.
- Cities want to continue to work with ARB to reduce and eliminate the major regional sources of air pollution – including continued funding for Diesel Toxins Reduction Program.