



South Coast Air Quality Management District

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Review of the Draft Subsequent Environmental Impact Report (Draft MND) for the Proposed Tropico Apartments Project

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 Subsequent Environmental Impact Report (SEIR) as appropriate.

Locomotive and Industrial/Commercial Activity Surrounding the Project Site

The proposed project is a sensitive land use¹ (i.e., residential land use) and located in close proximity to an active rail line and industrial/commercial operations that are potentially significant sources of toxic air emissions. Specifically, the lead agency proposes to place the project directly east of a rail line that is frequently used by the Southern California Rail Authority, Union Pacific Rail and AMTRAK and in the center of industrial/commercial operations. Recent data available from the Federal Railroad Administration's (FRA) website indicates that approximately 83 trains per day pass along the rail line located adjacent to the project site.² Further, based on Figure 3.0-2 the project site is surrounded by industrial/commercial uses that could be the source of toxic air emissions.

Health Risk Analysis

Given the potential health risk impacts from emissions associated with train locomotives and the surrounding industrial/commercial land uses the SCAQMD staff requests that the lead agency conduct a health risk assessment (HRA). The HRA should be based on the

¹ 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>

² Based on the most recent (2012) inventory of crossings at Chevy Chase Drive (at grade public crossing) north of the project site. The rail crossings inventory is available at the FRA's website at: <http://safetydata.fra.dot.gov/OfficeofSafety/>. More specific information may be available from the rail line operators.

most current information pertaining to the number of daily train movements on the aforementioned rail line and emissions data for industrial/commercial operations surrounding the project site. In the event that the lead agency determines the proposed project will result in significant health risk impacts to future sensitive receptors the SCAQMD staff recommends that the lead agency require all feasible mitigation to reduce these impacts to a less than significant level.

Response to Comments and Staff Contact Information

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, staff is available to work with the lead agency to address these issues and any other questions regarding air quality that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,



Ian MacMillan

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

Attachment

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