

## South Coast Air Quality Management District

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# Review of the Draft Mitigated Negative Declaration (Draft MND) for the Proposed Baldwin Park Transit Center Apartments

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 CEQA document as applicable. In the project description, the Lead Agency proposes construction of 71-units of multi-residential housing and approximately 5,920 square feet of retail space on a 0.96-acre site adjacent to a Metrolink transit station.

### Locomotive and Industrial/Commercial Activity Surrounding the Project Site

SCAQMD staff appreciates the potential regional air quality benefits from projects that facilitate mixed land uses in close proximity to transit. However, the proposed project is a sensitive land use<sup>1</sup> (i.e., multi-family residential) and its location in close proximity to an active rail line used by diesel locomotives and industrial/commercial operations may expose residents to potentially significant sources of toxic air emissions. Specifically, the lead agency proposes to place the project less than 200 feet north of a rail line that is frequently used by the Southern California Regional Rail Authority (Los Angeles County Metropolitan Transportation Authority's Metrolink). Recent data available from the Federal Railroad Administration's (FRA) website indicates that approximately 42 trains per day pass along the rail line located adjacent to the project site.<sup>2</sup> Further, based on Figure 2 (Site Vicinity), the project site is also located near industrial/commercial uses that could be the source of toxic air emissions that should be included in further analyses. Construction is scheduled to begin in early 2014 and be completed in mid-2015.

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<sup>&</sup>lt;sup>1</sup> 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

<sup>&</sup>lt;sup>2</sup> Based on the most recent (2012) inventory of crossings at Ramona Boulevard (at grade public crossing) south of the project site. The rail crossings inventory is available at the FRA's website at: <a href="http://safetydata.fra.dot.gov/OfficeofSafety/">http://safetydata.fra.dot.gov/OfficeofSafety/</a>. More specific information may be available from the rail line operators.

#### 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 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

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. The SCAQMD staff is available to work with the Lead Agency to address these issues and any other air quality questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

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Sincerely,

Ian MacMillan

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

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