



# South Coast Air Quality Management District

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## **Draft Environmental Impact Report (Draft EIR) for the Proposed Highland Park Residential Project (SCH No. 214081029)**

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 Environmental Impact Report (FEIR).

### Project Description

In the project description, the Lead Agency proposes construction of 398 single-family lots, a community park and open space on an approximately 168.3-acre project site. An electrically powered portable on-site rock crusher and associated screening and conveying equipment are also proposed during the three separate site grading phases that will include blasting and crushing of a total of approximately 282,000 cubic yards of rock. The amount of soil, rock exported or any expected infill was not included in the Draft EIR. Construction for the proposed project is planned in three phases occurring April 2014 through July 2018.

### Health Risk Analysis – Exposure from Nearby Train and Freeway Traffic

The SCAQMD staff is concerned that potential health risk impacts from train and freeway sources of diesel particulate matter within one-quarter mile of the proposed project site were not analyzed in the Draft EIR. In Exhibit 3-4 (Tentative Tract Map), the proposed residential lots are sited along the project's southern boundary. Based on the project description and an aerial map inspection of the project site, the southern portion of the project site is bordered by Union Pacific Rail Road (UPRR) tracks including a parallel track turnout just south of the project site. The turnout is used by trains waiting and possibly idling as passenger and freight trains travel past the turnout area. The UPRR tracks are historically used by Metropolitan Rail Authority passenger trains and other party controlled freight trains. Further, the State Route 60 Freeway (SR-60) is located approximately 650 feet<sup>1</sup> south of where residential lots are proposed

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<sup>1</sup> 650 measurement is based on an aerial map measurement. For analysis purposes, the most conservative distance is the closest point from the freeway to the southern property boundary, where proposed residential lots are planned.

including lots on the southern boundary. Both the train traffic and freeway<sup>2</sup> vehicle traffic are emission sources that are within one-quarter mile of future project future residences. Because diesel particulate matter from locomotive and diesel fueled vehicle exhaust is considered a carcinogenic toxic air pollutant that could adversely impact the proposed residents, the SCAQMD staff recommends that all toxic emission sources within one-quarter mile of the proposed residential lots including the train and freeway vehicle emissions be included in a Health Risk Assessment (HRA) analysis in the FEIR. Otherwise, the Lead Agency has not demonstrated its significance determinations regarding project cancer risks to future residents from the nearby train and freeway traffic. Guidance for mobile source toxics analysis is available at the SCAQMD website<sup>3</sup>.

### Potential Permit Requirements

The proposed project includes approximately 282,000 total cubic yards of rock crushing and blasting activities during the three separate site preparation construction phases. As part of these activities, the use of a portable electric rock crusher is described in the air quality analysis<sup>4</sup>. As a responsible agency, the SCAQMD might require permits, under certain criteria, from the project applicant for the rock crushing, screening and conveying system equipment based on potential emissions including fugitive dust. Further, the FEIR should include all construction emissions including any fugitive dust emissions from the crushing, screening and conveying system equipment operation, loading, and hauling away any soil or crushed rock, as applicable.

Finally, the SCAQMD should also be added as a responsible agency Under Regulatory Framework in the Air Quality Section starting on page 4.1-8 under “Local – South Coast Air Quality Management District” because of its permit granting authority for applicable equipment based on the Draft EIR’s project description. If the project applicant intends to rely on this EIR for issuance of air quality permits, the FEIR should contain sufficient detail in order for the SCAQMD to issue applicable permits. Questions concerning SCAQMD permit requirements can be directed to SCAQMD Engineering and Compliance staff at (909) 396-2718.

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<sup>2</sup> 2014 California Department of Transportation <http://traffic-counts.dot.ca.gov/> : Back Peak Month at Valley Way - 150,000 daily vehicles including 19,500 trucks per day (13% truck % of total vehicles).

<sup>3</sup> <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis> .

<sup>4</sup> Highland Park (Tract 31894) Air Quality Impact Analysis, Urban Crossroads, January 2013)

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Pursuant to Public Resources Code Section 21092.5, SCAQMD staff requests that the Lead Agency provide the SCAQMD staff with written responses to all comments contained herein prior to the adoption of the FEIR. Further, staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist CEQA Section, at (909) 396-3302, if you have any questions regarding the enclosed comments.

Sincerely,

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