South Coast
Air Quality Management District
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Draft Initial Study/Mitigated Negative Declaration (DMND) for the Proposed Meta Housing Corporation Compton Senior Housing Development Phase II Located at 409, 413, and 415 North Alameda Street

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. In the introduction portion of the DMND on page four, a senior housing development (Phase I in Exhibit 2.3) is currently under construction. Based on SCAQMD records, the SCAQMD staff did not receive a CEQA document for the construction and operation of Phase I. Because residents occupying both Phase I and II senior housing would be exposed to substantial adverse health effect impacts from truck and train emissions operating on the adjoining streets and the Alameda Corridor, the SCAQMD staff would like to submit comments that SCAQMD staff believes apply to both Phases I and II during operations. The following comments are therefore meant as guidance for the Lead Agency and should be incorporated into the Final CEQA document.

Project Description and Surrounding Land Uses

The Lead Agency proposes construction of 36-units designed for residents described in the DMND as senior citizens, i.e., at least 55 years of age (page 14). The three-story residential building area is approximately 35,323 square feet on an approximately 0.81-acre site, which does not include a description of the Phase I site under construction. In footnote two on page five, the previous buildings depicted in the aerial photo in Exhibit 2.3 in the DMND have already been demolished. The site is currently vacant as described under existing land uses on page five. Surrounding land uses include the current construction of Phase I of Senior Housing to the west, family townhome residences to the northwest, a commercial/retail center to the south and the Alameda Corridor just east of the proposed project site. Construction is estimated to be completed over a 12-month period beginning around May 2015.

Siting of Sensitive Receptors Near A High-Volume Rail Corridor

Based on the description of surrounding land uses, the proposed residences will be sited next to North Alameda Street, which bounds the project site to the east. Just east of and parallel to North Alameda Street is the Alameda Corridor, which has an average train activity of 44 trains per day including approximately 132 locomotive engines.[1] Although the Lead Agency determined that potential short- and long-term emission impacts from the proposed project would be less than significant, potential adverse health impacts to future residents from exposure to train emissions were not evaluated in the DMND. Because future residents will be exposed to a significant source of toxic emissions from the trains, the Lead agency should therefore estimate the potential cancer risk to the future residents and compare the estimates to recognized thresholds in the Final MND.

This information is important for two reasons. First, the train trip emissions contribute to air quality impacts from the proposed project. Second, the California Air Resources Board has classified the particulate portion of diesel exhaust emissions as carcinogenic. If there is a substantial number of train trips with corresponding diesel-powered locomotive engines, an air toxics health risk analysis may be warranted to disclose the potential cancer risks. The SCAQMD has developed a methodology for estimating cancer risks from mobile sources in a document entitled Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions. This document can be downloaded from the SCAQMD's CEQA web pages. [2]

In addition to exposure to potential toxic emissions from the nearby train activity, the SCAQMD staff recommends that the lead agency also estimate potential health risks to the future residents from other sources of toxic emissions. The Health Risk Assessment should also evaluate all permitted and unpermitted sources of toxic emissions within a one quarter mile radius of the site to determine if health risks are below SCAQMD thresholds. Otherwise, the lead agency has not demonstrated that public health will not be significantly impacted by this project and has failed to disclose the health impacts to future residents of the project.

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final CEQA document. 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.

[1] Daily Train Trips: 530 /12 years (2003-2014) = Average of 44 trains per day. 3 locomotive engines per train times 44 trains per day = 132 locomotive engines per day. Alameda Corridor Transportation Authority: http://acta.org/pdf/CorridorTrainCounts.pdf .

[2] http://www.aqmd.gov/ceqa/handbook/mobile_toxic/diesel_analysis.doc .

Sincerely,

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