



## South Coast Air Quality Management District

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FAXED: MARCH 11, 2009

March 11, 2009

Mr. Albert Fontanez, Project Planner  
Community Development Department  
City of Huntington Park  
6550 Miles Avenue  
Huntington Park, CA 90255

### **Draft Mitigated Negative Declaration (Draft MND) for the Proposed Case No. 1896-GPA/ZC/CUP/VAR Aspire Public Schools – Titan Campus Project**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The SCAQMD would also like to thank the lead agency for the additional time to submit comments. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final Mitigated Negative Declaration.

The lead agency notes that the California Air Resources Board's (CARB) Handbook: Air Quality and Land Use - A Community Health Perspective includes recommendations for providing buffer zones when siting projects that include sensitive land uses (schools, residences, playgrounds, convalescent centers, nursing homes, long-term health care facilities, etc.) close to a major service rail yards, resulting in exposures to associated diesel particulate emissions, which has been classified as a carcinogen by CARB. The CARB Handbook is based on a number of health studies and states, in part, that there is an association between sensitive receptor proximity to exposure to high levels of rail traffic and a variety of respiratory symptoms, asthma exacerbations, and decreases in lung function in children.

Even though the proposed school is not being sited near a rail yard, the SCAQMD is concerned about siting a school near a high traffic corridor rail line that, according to the Draft MND, lies 65 feet east of the proposed project site. Further, if the lead agency's HRA assumption that up to 100 trains per day will pass by the proposed school is correct, substantial DPM emissions would occur in the vicinity of the proposed school.

Finally, although the agency concludes that cancer and non-cancer risks to students and teachers will be less than significant with mitigation, SCAQMD staff suggests that the lead agency consider relocating the facility to a location that is not adjacent to substantial sources of air toxics emissions or to locations that allow a minimum buffer zone of 1,000 feet between the proposed school and the air toxics emission sources.

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1

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Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final Mitigated Negative Declaration. The SCAQMD staff would be happy 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 these comments.

Sincerely,

Steve Smith, Ph.D.  
Program Supervisor – CEQA Section  
Planning, Rule Development & Area Sources

Attachment

SS:GM

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