



# South Coast Air Quality Management District

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## **Review of the Recirculated Draft Environmental Impact Report (Draft EIR) for the Cornfield Arroyo Seco Specific Plan Project**

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. AQMD staff appreciates the cooperation of lead agency staff in addressing our previous comments. The following comment is intended to provide guidance to the lead agency and should be incorporated into the Final Environmental Impact Report (Final EIR) as appropriate.

On November 18, 2012 the AQMD staff submitted a comment letter regarding the Draft EIR for the proposed project. At that time, AQMD staff expressed concern about the potential health risk impacts to future residents (i.e., sensitive receptors) that will occupy the development from toxic air contaminants (TAC) sources that surround the project site. Specifically, the proposed project is surrounded by the 5 Freeway, 110 Freeway, industrial facilities, rail lines, and a major rail yard. The Draft EIR included mitigation requiring a 300 foot buffer between sensitive land uses and freeways and determined that the project would have insignificant health risk impacts. However, given that a quantitative health risk analysis was not completed to demonstrate the effectiveness of this measure the AQMD staff recommended that the lead agency provide additional mitigation (consistent with the CARB Handbook<sup>1</sup>) to ensure insignificant health related impacts from local sources of TACs. Further, the AQMD staff recommended that in the event these measures were found infeasible, that the lead agency provide a health risk assessment that quantifies the project's impacts and demonstrates the potential effectiveness of any mitigation measures that would minimize any significant health risk impacts. Also, the AQMD recommend that the lead agency provide additional mitigation measures to minimize the project's significant construction related emissions.

AQMD staff appreciates that in response to the above mentioned recommendations the lead agency incorporated additional mitigation measures into the Recirculated Draft EIR

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<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>

that will minimize the project's impacts and that could potentially reduce public exposure to air pollutants for residents of this project. AQMD staff recommends that the lead agency provide a minor clarification to Mitigation Measure Air Quality 2 (MM AQ-2) of the Recirculated Draft EIR that explicitly defines an "acceptable level for cancer and non-cancer risks." Specifically, the lead agency should state in MM AQ-2 that an "acceptable level" for cancer risk is not to exceed one in one hundred thousand or a non-cancer hazard index of 1.0 consistent with AQMD recommended thresholds.

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 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

IM:DG

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