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Los Angeles Unified School District
Office of Environmental Health and Safety
1055 West Seventh Street, 9th Floor
Los Angeles CA 90017

Recirculated Draft Environmental Impact Report (Draft EIR) for the Proposed South Region High School No. 7 Project

The South Coast Air Quality Management District (SCAQMD) appreciates the additional time to provide comments on the above-mentioned document. On January 16, 2008, the SCAQMD staff commented on the Draft EIR dated April 2006 (SCH No. 2005041006) and incorporates by reference its comments as applicable for this proposed project.

The SCAQMD is concerned that LAUSD is considering siting a high school adjacent to the Alameda Corridor. This high school will be surrounded by approximately 65 commercial and manufacturing facilities and the Alameda Corridor is within one-quarter mile of the site. Based on the lead agency's estimates, approximately 100 freight trains are expected to travel daily along the Alameda Corridor, which is 350 feet from pass the proposed high school.

Regarding the mitigated health risk analysis, SCAQMD staff believes that the health risks presented in the Recirculated Draft EIR are underestimated and are calculated inconsistent with OEHHA Guidelines. Further, the health risk assessment shows that diesel particulate matter from on-road truck activity along the Alameda Corridor generates the majority of the cancer risk. The unmitigated cancer risk to adults is 17 in one million (17×10^{-6}), which exceeds the cancer risk threshold of 10 in one million (10×10^{-6}). According to the mitigation discussion, adult cancer risks are mitigated to 9.2 in one million (9.2×10^{-6}). However, given the concerns staff has regarding the mitigation (see attached comments), adult cancer risk impacts may continue to be significant. The SCAQMD recommends that the lead agency recalculate the mitigated health risk according to OEHHA Guidelines and present this information in the Final EIR.

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 Environmental Impact Report. 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

LAC080911-01
Control Number

Air Quality Analysis

1. On page 2-7 of the Draft EIR, the lead agency states that the proposed project includes an underground parking structure. It is not clear from the URBEMIS2007 output sheets if excavation activities were included in the analysis. If the excavation activities were included, please describe the assumptions used, input parameters, e.g., amount of soil excavated per day, etc. If excavation activities were not included in the analysis, the analysis should be rerun with at a minimum, the number of cubic yards per day of on-site cut-and-fill.

Health Risk Assessment

2. Emissions were estimated for Service Plating Company (SCAQMD Facility ID 24240) based on site interviews and standard emissions factors. Because facility operators plate with hexavalent chromium, cadmium and nickel, which are highly toxic air pollutants, SCAQMD staff reviewed permit files for the plating tanks and control devices at this facility. The emissions in the permit files appear to be greater than those used in the health risk assessment (HRA). SCAQMD staff suggests that the lead agency review the permit files for Service Plating Company and adjust emission or release parameters as necessary for the HRA in the Final EIR.
3. On page 21 of the HRA, acid baths are listed for Sanders Service; however, Sanders Service is not listed in the companies analyzed for toxic emissions. An explanation as to why no toxic emissions were reported from this facility should be included in the Final HRA.
4. Emission factors for locomotives were estimated for Notch 6 speeds. Notch 6 speeds appear to be high. Depending on the locomotive engine, Notch 6 speeds may generate higher or lower emissions than lower notch speeds, especially the more likely Notch 5 speed. The Final HRA should provide detailed discussion on the development of the emission factors, and whether Notch 6 speed emission factors would provide a conservative estimate of emission from the locomotives than other notch speeds. If it is determined that lower notch speeds would provide a more conservative estimate of health risk than Notch 6 speeds, then the HRA should be adjusted accordingly.

Risk Assessment Mitigation Analysis

5. Correction factors were used to modify the health risk reported in the HRA in the mitigation analysis. LAUSD staff has in the past stated that HRAs were prepared according to OEHHA methodology; however, it is not clear that the mitigation analysis was completed according to OEHHA methodology. As stated in SCAQMD's January 16, 2008 comment letter on the Draft EIR for this project (attached and incorporated herein by reference), standard OEHHA methodology should be used to develop health risk and mitigation analysis.

6. Page 24 of the HRA includes a description of the inhalation adjustment completed for the mitigation assessment. SCAQMD staff has commented on this adjustment methodology in a previous letter on the Draft EIR dated January 16, 2008. Mitigation should be applied directly to the health risk reported in the HRA. The health risk assessment and the mitigation assessment should follow the same methodology. It is inappropriate to reduce the breathing rate from 19 cubic meters per day to 4.75 cubic meters per day while indoors and 2.38 cubic meters per day while outdoors, since reducing the breathing rate would reduce the health risk. By reducing the breathing rate to 7.13 cubic meters per day (4.75 cubic meters per day indoors and 2.38 cubic meters per day while outdoors), the health risk is reduced by 38 percent before the mitigation is even applied to the indoor breathing rate.

SCAQMD staff suggests that breathing rate correction should be completed according to Table 2-C Annual Concentration Adjustment Factors (AFann) Equipment Operating 12 Hours per Day or Less from the SCAQMD Risk Assessment Procedures for Rule 1401 and 212, Version 7.0, which can be downloaded from the SCAQMD website at <http://www.aqmd.gov/prdas/Risk%20Assessment/RiskAssessment.html>.

7. Page 25 of the HRA states that the mass ground level concentrations determined through dispersion modeling were corrected from average annual daily concentrations to average annual hourly concentrations. ISCST3 estimates hourly, daily and annual average concentrations. Carcinogenic health risk is based on average annual concentrations per OEHHA guidance, which are estimated from average annual emissions estimated by ISCST3. Correcting average annual daily concentrations to average annual hourly concentrations does not appear to make sense, because ISCST3 only generates average annual concentrations, if average annual emissions are used. Further, health risk assessment is based on annual average emissions. So, all emissions (hourly, daily) should be consistent with annual average emissions.

If the hourly and daily emission rates are not consistent with the annual average emissions, then either the HRA, the mitigation assessment or both are incorrect. In the Final EIR, both the HRA and the mitigation analysis should be based on annual average emissions.