



South Coast  
Air Quality Management District

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

**Draft Environmental Impact Report (Draft EIR) for the Proposed South Region Middle School No. 3 Project**

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.

Pursuant to Public Resources Code Section 21092.5, please provide the AQMD 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

LAC080916-06  
Control Number

### **Air Quality Analysis**

1. In the URBEMIS2007 output sheets, the lead agency has switched on several mitigation measures during the construction mass and fine grading phases, which reduces PM10 to less than significant for localized air quality impacts, but has not formally included these measures in the Draft EIR. Table 3A-7, however, includes the emission reductions from these measures during construction grading activities. SCAQMD staff requests that the lead agency incorporate the mitigation measures used to derive mitigated construction emissions into the air quality text of the Final EIR. As a side note, it would be helpful if the lead agency indicated that emissions in Table 3A-7 are mitigated emissions.

### **Health Risk Assessment**

2. The Health Risk Assessment (HRA) for South Region Middle School 3 (SRMS3) presents a carcinogenic health risk of 12.6 in one million, which exceeds the significance threshold of 10 in one million. LAUSD proposes to mitigate this health risk by using MERV 11 rated filters. In the mitigation report the HRA, the carcinogenic health risk was reduced by reducing the breathing rate from 24 hours to 9 hours.

For this proposed project, both the carcinogenic health risk from the HRA and the lower adjusted carcinogenic health risk estimated in the mitigation report would likely be less than significant with the proposed mitigation. However, SCAQMD staff is concerned that lowering the carcinogenic health risk reported in the HRA by post processing done according to the methodology used in the migration report may not fully reduce carcinogenic risk to less than significant as reported in other LAUSD CEQA documents.

Adjustments to the carcinogenic health risk value, such as the breathing rates, should be done in the HRA, so that the unmitigated carcinogenic health risk is clear to the public.

This issue is important because, according to the Draft EIR (page 3C-3), the proposed school site is located approximately 650 feet from the Alameda Corridor. Although there is no passenger train service on the rail lines and no rail spurs or switching yards are located near the proposed school site, the lead agency states that since 2002 up to 55 freight train trips per day would travel past the proposed middle school with up to 66 freight train trips projected by 2012. These trains may consist of up to 200 freight/container wagons and would be powered by up to four diesel locomotives. Given that a majority of the cancer risk at the proposed school appears to come from trains traveling on the Alameda Corridor, it is important to implement the maximum feasible mitigation measures to ensure that cancer risk impacts are reduced to the greatest extent feasible.