



South Coast
Air Quality Management District

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January 16, 2008

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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 February 15, 2007, 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 staff is concerned that LAUSD is considering siting a high school adjacent to the Alameda Corridor. This high school will be surrounded by approximately 30 commercial and manufacturing facilities and the Alameda Corridor. Based on the lead agencies estimates, approximately 100 freight trains are expected to pass by the proposed high school daily. This proposed high school will bring students, teachers, and administrators to an area where the cancer risk to the faculty is 63 in a million, which exceeds the SCAQMD's significance threshold of 10 in a million by six-fold.

Regarding the health risk to the students, the SCAQMD staff believes that the health risk to the students presented in the Recirculated Draft EIR are underestimated and are calculated inconsistent with OEHHA Guidelines. The SCAQMD recommends that the lead agency recalculate the health risk to school children using an exposure duration that is consistent with OEHHA Guidelines and present this information in the Final EIR.

Based on the information presented in the recirculated Draft EIR it is unclear if the proposed cap on the Alameda Corridor can result in a 75 percent reduction in toxic air contaminants or if the health risk can be reduced to a level of less than significance. The SCAQMD staff recommends that the lead agency demonstrate that the cap on the Alameda Corridor is feasible and verify emission reductions prior to approving construction of the proposed school. In addition, if the health risk remains significant

after construction of the cap on the Alameda Corridor, the SCAQMD staff recommends LAUSD consider another site location that will not have significant health effects to the students and faculty.

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,

Susan Nakamura
Planning Manager
Planning, Rule Development & Area Sources

Attachment
SS:JK:GM

LAC071218-14
Control Number

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Health Risk Assessment

1. The recirculated EIR states that mitigated health risk would be less than significant if all mitigation measures are implemented. SCAQMD staff is concerned about the viability of the proposed mitigation M-3E.1 for the trains (sealing the portion of the Alameda Corridor near the proposed school and filtering particulates from the sealed area). If mitigation measure M-3E.1 is not effective, then the recirculated EIR states that health risk would be significant. SCAQMD staff strongly recommends that LAUSD not adopt the proposed project, if the health risk is significant.
2. The initial vertical dimension of five meters for the Alameda Corridor does not correspond with the width of 50 feet listed in the Tables 1 & 2 ERs for RRs tab in the Revised Tables for SRHS 7 v9 7-13-07 and Table 3-1 of the User's Guide for the Industrial Source Complex (ISC3) Dispersion Models, Volume I – Users Instructions. Since the volume sources are adjacent line sources the width of 50 feet (15.2 meters) should be divided by 2.15, which is 7.1 meters instead of five meters. This was completed correctly for the La Habra Spur. The initial vertical dimension of the Alameda Corridor should be corrected in the air dispersion modeling for the Final EIR.
3. Correction factors were added to the values estimated by the original health risk assessment to update values and so mitigation measures could be evaluated. The health risk and mitigation are hard to evaluate because the health risk assessment was not redone, but adjusted with correction factors. LAUSD staff should use standard OEHHA methodology in the development of health risk and mitigation analysis.
4. Corrections were made to the breathing rates in the mitigation analysis to adjust for exposure less than 24-hours. SCAQMD staff suggest that LAUSD staff use Table 2-C Annual Concentration Adjustment Factors (AFann) Equipment Operating 12 Hours Per Day or Less from the SCAQMD Risk Assessment Procedures for Rules 1401 and 212, Version 7.0, which can be download from the SCAQMD website at <http://www.aqmd.gov/prdas/Risk%20Assessment/RiskAssessment.html>.

For future projects, SCAQMD staff suggests that LAUSD staff make the methodology used in the HAR and mitigation analysis consistent.

5. Health risk was estimated using the unit risk factor. Since OEHHA methodology is based on cancer potency factor, SCAQMD staff suggests that LAUSD staff should use the OEHHA cancer potency methodology in the Final EIR.
6. In the Recirculated Draft EIR, the lead agency used an exposure duration of four years to estimate carcinogenic health risk for children in the proposed project, which

is less than OEHHA guidance. In the Final EIR, the lead agency should include health risk values for exposure durations that are consistent with OEHHA.

7. SCAQMD staff was not able to find a final carcinogenic health risk value on the proposed school, which was used to determine the significance of health risk. LAUSD staff should present a final carcinogenic health risk value on the proposed school in the Final EIR for the public to evaluate.