



South Coast
Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

FAXED: October 23, 2009

October 23, 2009

Mr. Roderick Diaz
Project Manager
Los Angeles County Transportation Authority
One Gateway Plaza, MS 99-22-3
Los Angeles, CA 90012-2952

**Review of the Draft Environmental Impact/Statement Report (DEIR/DEIS)
for the Proposed Crenshaw Transit Corridor Project**

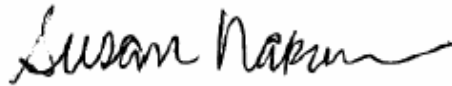
The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the lead agency and should be incorporated into a revised draft or final Environmental Impact Report/Statement (final EIR/EIS) as appropriate.

The lead agency failed to quantify criteria pollutant emissions during construction. Based on the project description the proposed project includes a substantial amount of construction activities. Emissions from construction equipment should be quantified to determine if construction impacts are significant regionally and locally. Without quantification of construction emissions, the air quality analysis is deficient. Therefore, the SCAQMD staff requests that the lead agencies quantify all the construction emissions and revise the CEQA document as appropriate. If the project's construction emissions result in significant impacts the SCAQMD staff recommends that the lead agency mitigate these impacts pursuant to CEQA Guidelines Section 15370. Please refer to comment #4 for recommended mitigation measures.

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/EIS. 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,

A handwritten signature in black ink that reads "Susan Nakamura". The signature is fluid and cursive, with a long horizontal flourish at the end.

Susan Nakamura
Planning Manager
Planning, Rule Development & Area Sources

Attachment

SS:EE:DG

LAC090909-04
Control Number

Air Quality Analysis:

1. The lead agencies did not quantify construction air quality impacts from the proposed project. To adequately evaluate air quality impacts, it is necessary to quantify construction emissions and compare them to applicable significance thresholds. Therefore, SCAQMD staff requests that the lead agency revise the draft EIR/EIS to identify all potential adverse air quality impacts that could occur from the construction phase of the project and all air pollutant sources related to project construction (including demolition, if any). Construction-related air quality impacts typically include, but are not limited to, emissions from the use of construction equipment such as but not limited to heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings used for striping traffic lanes or any associated structures, off-road equipment and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips).

The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD recommends that the lead agency use this Handbook as guidance when preparing its revised air quality analysis. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. Additionally, the lead agency may be able to use the URBEMIS 2007 Model. This model is available on the SCAQMD Website at: www.aqmd.gov/ceqa/models.htm.

2. In addition to analyzing regional air quality impacts the SCAQMD staff recommends calculating localized air quality impacts from the project's construction and operation emissions (buses, maintenance yards, parking structures and/or parking lots). The resulting localized air quality impacts should be compared to the localized significance thresholds (LSTs). LSTs can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, SCAQMD staff requests that the lead agency perform a localized significance analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/ceqa/handbook/LST/LST.htm>.

Health Risk Assessment

3. The California Air Resources Board (CARB) identified PM from diesel-fueled engines as a toxic air contaminant (TAC) in 1998, following an exhaustive 10-year scientific assessment process. In addition, as part of the identification process, the Office of Environmental Health Hazard Assessment (OEHHA) evaluated the potential for diesel exhaust to affect human health. OEHHA found that exposure to diesel PM resulted in an increased risk of cancer and an increase in chronic non-cancer health effects including a greater incidence of cough, labored breathing, chest tightness, wheezing, bronchitis, and asthma.

There are a number of studies that show a correlation of adverse health impacts of diesel PM and proximity to roadways. CARB recommends avoiding development of urban roads with 100,000 vehicles/day, that are within 500 feet of sensitive land uses due to increased cancer risk from diesel PM¹. The health effects from diesel PM can and must be quantified in the draft EIR/EIS. There are a variety of air dispersion models available, including but not limited to, CAL3QHCR and AERMOD to conduct air dispersion modeling of mobile source emissions. Additional information on these models can be obtained at: www.epa.gov/scram001/dispersion_prefrec.htm.

The Crenshaw Transit Corridor Project will generate additional bus trips increasing mobile source emissions occurring close to sensitive receptors along the affected corridor. Therefore, SCAQMD staff urges the lead agency to use alternative fueled buses such as compressed natural gas (CNG) buses for the proposed project. If diesel fueled buses are used for the proposed project SCAQMD recommends that the lead agency perform a mobile source health risk assessment (HRA) that includes air dispersion modeling, quantified health risk, and a significance determination in the draft EIR/EIS from implementation of the proposed project. There are several guidance documents available for air dispersion modeling and HRAs. Below is a discussion to assist the lead agency in developing a HRA for the proposed project.

HRA Guidance

The SCAQMD's Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis and be found at: http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.htm. Also, both Ports of Los Angeles and Long Beach have SCAQMD approved HRA protocols, ARB has air dispersion guidance in Appendix 7 of the Diesel Risk Reduction Plan, which, can be found at: <http://www.arb.ca.gov/diesel/documents/rrpapp.htm>, and HARP can be downloaded from the ARB website at: <http://www.arb.ca.gov/toxics/harp/harp.htm>.

If the SCAQMD's Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis is used, the health risk estimates should be completed according to OEHHA's cancer potency methodology. The SCAQMD's recommended threshold for cancer risk should not exceed 10 in one million at any receptor location, when compared to the pre-project risk.

Dispersion Modeling

CALINE3 and CAL3QHCR are the current EPA regulatory models for estimating maximum CO concentrations at roadways. Carcinogenic risk is estimated based on annual average concentrations over 70 years for residential and sensitive receptors

¹ 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>

and 40 years for worker receptors. Chronic non-carcinogenic risk is also estimated based on annual average concentrations. CAL3QHCR can be used to estimate carcinogenic health risk for roadway risks.

AERMOD and ISCST3 can be used to estimate carcinogenic health risk for both roadway and non-roadway sources. AERMOD is the current EPA approved model for general air dispersion modeling. Since CAL3QHCR and AERMOD are the current EPA approved models, either may be used for air dispersion modeling. For CEQA modeling, SCAQMD staff recommends use of any of these models (AERMOD, ISCST3, or CAL3QHCR) or HARP, which uses ISCST3.

Mitigation Measures

4. In the event that the lead agency's revised or final draft EIR/EIS requested in comment #1 through comment #3 demonstrates that any criteria pollutant emissions from the regional and/or localized construction emissions analysis create additional significant adverse impacts the SCAQMD recommends that the lead agency require mitigation pursuant to CEQA Guidelines §15370, which could minimize or eliminate significant adverse air quality impacts. To assist the lead agency with identifying possible mitigation measures for the project, please refer to Chapter 11 of the SCAQMD CEQA Air Quality Handbook for sample air quality mitigation measures. A list of mitigation measures can be found on the SCAQMD's CEQA webpage at the following internet address: www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.htm

Additionally, SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook contain numerous measures for controlling construction-related emissions that should be considered for use as CEQA mitigation if not otherwise required.

5. On page 4-161 of the draft EIR/EIS the lead agency states that “there are no feasible mitigation measures that would reduce these emissions, therefore, an unavoidable significant operational air quality impact is anticipated.” However, the lead agency does not identify which mitigation measures are infeasible. The SCAQMD recommends that the lead agency consider the following mitigation measures to reduce air quality impacts from the operation phase of the project, if feasible:
 - Improve traffic flow by signal synchronization;
 - Require or provide incentives for particulate traps that meet CARB certified level 3 requirements;
 - Restrict operation to alternative fueled buses, such as compressed natural gas which is used in the project's BRT Alternative or restrict the operation to “clean” buses, such as 2010 compliant vehicles ;
 - Require all vehicles and equipment to be properly tuned and maintained according to manufacturers' specifications;
 - Electrify service equipment at service facilities;
 - Conduct air quality monitoring at sensitive receptors; and
 - Require a reduction in electricity use for light rail transit by implementing the use of alternative energy, such as wind and solar power.