



South Coast
Air Quality Management District

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Los Angeles Unified School District
Office of Environmental Health and Safety
1055 West 7th Street, 9th Floor
Los Angeles, CA 90017

**Draft Environmental Impact Report (Draft EIR) for the Proposed Bell Education
and Career Center (SCH No. 2009041056)**

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

LAC090714-03
Control Number

Air Quality Analysis - Construction

Siting of Sensitive Land Uses Near Freeways and High Traffic Roads

1. In Chapter 3C Hazards and Hazardous Materials on page 3C-1, the lead agency states that the proposed project will be located within 500 feet of the I-710 Freeway and further states in Appendix D, Health Risk Assessment on page 21, that future expansion of the I-710 Freeway may occur. This future expansion could include up to four additional heavy-duty truck lanes used for goods movement; extending the freeway 200 feet or more closer to the proposed school site. This future expansion would place the people coming to the site: the adult students, high school students, staff and children at the temporary day care service within 300 feet of the I-710 Freeway. The California Air Resources Board (CARB) has published the "Air Quality and Land Use Handbook: A Community Health Perspective (April 2005) "(Handbook), which is available at the following website: <http://www.arb.ca.gov/ch/landuse.htm> . This Land Use Handbook recommends against siting projects that include sensitive land uses (schools, residences, playgrounds, convalescent centers, nursing homes, long-term health care facilities, etc.) near or adjacent to high traffic and the associated emissions that may lead to adverse health effects beyond those associated with regional air pollution in urban areas. The Handbook is based on a number of health studies and states, in part that there is an association "between residential proximity to high traffic roadways and a variety of respiratory symptoms, asthma exacerbations, and decreases in lung function in children." One such study (Brunekreef, 1997) "found an association between traffic and respiratory symptoms in children showing measurements of traffic-related pollutants showing concentrations within 300 meters (approximately 1,000 feet) downwind of freeways being higher than regional values." The key observation according to these studies cited in the Handbook is that "close proximity increases both exposure and the potential for adverse health effects." Other effects associated with traffic emissions according to the Handbook include "premature death in elderly individuals with heart disease." Consistent with the recommendations in CARB's Land Use Handbook, the lead agency should avoid siting new sensitive land uses, such as the proposed project, within 500 feet away from a freeway, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles per day.

Hazards and Hazardous Materials

2. Under Chapter 3C Hazards and Hazardous Materials on page 3C-2, the lead agency has described potential soil contamination from sources including an existing oil well on-site that was abandoned. The lead agency is reminded that, if soil is contaminated by hydrocarbon contaminants, contaminated sites would be subject to SCAQMD Rule 1166 – Volatile Organic Compound Emissions from

Decontamination of Soil and that compliance should be referenced in the Final EIR.

Health Risk Assessment (HRA)

3. Diesel exhaust particulate sources are modeled as area sources in the air dispersion model, but presented as volume sources in the calculation spreadsheets. The calculation spreadsheets should be updated in the Final EIR to reflect the sources modeled in the air dispersion model, which were used to estimate diesel exhaust particulate concentrations used to estimate health risk.
4. A Dunn Edwards facility is included in the plot plans, emissions calculations and air dispersion modeling, but was not included in the health risk estimate. Health risk from Dunn Edwards operation should be added to the Final HRA and EIR.
5. Diesel emission factors are inconsistent throughout the analysis. The EMFAC2007 output file lists the heavy duty diesel truck idling emission factor as 1.199 grams per hour for 2011. The diesel truck idling emission factor for receiving at Engineered Polymer Solutions is 1.366 grams per hour. The BNSF truck yard diesel truck idling emission factor is 0.222 gram per hour. A footnote for the BNSF truck yard diesel truck idling emission factor states that the EMFAC2007 emission factor was adjusted for drayage truck requirements for rail yards, but no documentation on how the factor was adjusted was included in the HRA or EIR. In addition, no idling emissions are provided for receiving at Classic Concepts and Individual Group/Fergadus, which is inconsistent with idling emissions estimated for receiving at Engineered Polymer Solutions. The emission rates should be consistent in the Final HRA/EIR. Idling and on-site travel emissions should be estimated for all facilities with heavy-duty truck activity. The methodology for adjusting the EMFAC2007 emissions at the BNSF truck yard should be provided in detail in the Final HRA/EIR.
6. The future expansion of the I-710 freeway is discussed in the HRA. The exact nature of the I-710 freeway expansion is unknown; however, some provision for revisiting the HRA and reevaluating health risk if the freeway encroaches into the school boundary should be provided as a mitigation measure.