



South Coast Air Quality Management District

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FAXED: JUNE 1, 2006

June 1, 2006

Ms. Jessica Rappaport
Los Angeles Unified School District
Office of Environmental Health and Safety
355 South Grand Avenue, 15th Floor
Los Angeles, CA 90071

Dear Ms. Rappaport:

**Draft Environmental Impact Report (DEIR) for the
South Region High School No. 7
Huntington Park**

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 in the Final Environmental Impact Report.

SCAQMD staff is concerned about the location of the proposed high school. The proposed school site will be located on land that is zoned "Manufacturing Planned Development" a designation where the Draft EIR states on page 2-15, "a school is not a permitted use in either of these zones either by right or pursuant to a Conditional Use Permit (CUP)." The proposed high school is directly adjacent to the Alameda Corridor and Alameda Street. Based on the Draft EIR, the Alameda Corridor is a freight rail expressway carries about 50 trains with four locomotives per train representing 200 locomotives per day. In addition, approximately 1,000 feet from the proposed high school is an additional rail line that does not appear to be included in the Health Risk Assessment. The SCAQMD staff recommends that the Health Risk Assessment include this additional rail line.

In addition, the proposed project site includes approximately 30 commercial and manufacturing facilities that are located within a one-quarter mile radius of the proposed project. Included in the list of facilities are a chrome plating facility, auto body shop, alloy cleaning facility, and a service station. The Draft EIR should include for the public a map that identifies all facilities and their proximity to Proposed South Region High School No. 7.

The SCAQMD staff would discourage the lead agency from locating Proposed South Region High School near a major rail corridors and major arterials. Based on the Office of Environmental Health Hazard Assessment et al., "Traffic-Related Air Pollution Near Busy Roads" increases in odds of bronchitis symptoms and physician-diagnosed asthma in neighborhoods was seen in areas with higher concentrations of traffic pollutants. The SCAQMD staff is concerned that even with installation of HVAC systems, particulate emissions from the rail line will impact the school-based population as school children may walk to school and perform many school activities outdoors. To ensure that the school population is adequately protected, the SCAQMD staff recommends that the Lead Agency conduct monitoring to ensure that particulate levels at the school are minimized.

The SCAQMD staff strongly recommends that the lead agency reconsider the siting of Proposed South Region Highschool No. 7 and continue to evaluate alternative sites. The lead agency should consider a precautionary approach to ensure that the health of the school children and the school personnel are not placed in an unhealthy environment. EPA's, "Supplemental Guidance for Assessing Susceptibility from Early-Life Exposure to Carcinogens," suggests that cancer risk are generally higher from early-life exposure than from similar exposure durations later in life.

SCAQMD staff would like these concerns to be addressed by the lead agency before certification of the Final Environmental Impact Report. Please find attached additional comments regarding the proposed project. Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein. The SCAQMD is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Charles Blankson, Ph.D., Air Quality Specialist – CEQA Section, at (909) 396-3304 if you have any questions regarding these comments.

Sincerely

Susan Nakamura
Planning and Rules Manager
Planning, Rule Development & Area Sources

Attachment

SN: CB
LAC060418-01
Control Number

**DEIR for the Proposed South Region High School No. 7
Huntington Park**

1. **Cumulative Daily Construction Emissions:** Table 3B-12 on page 3B-21 of the DEIR shows that cumulative construction NO_x emissions will exceed the significance thresholds. The lead agency does not recommend any measures to reduce these impacts. SCAQMD staff recommends that the lead agency consider the following measures for implementation where applicable or feasible:

- For all equipment, such as yard tractors, loaders and other construction equipment, require the use of alternative clean fuel such as electric or compressed natural gas-powered equipment with oxidation catalysts and particulate traps instead of gasoline- or diesel-powered engines. However, where diesel equipment has to be used because there are no practical alternatives, require the use of low sulfur diesel, as defined in SCAQMD Rule 431.2, i.e., diesel with sulfur content of 15 ppm by weight or less. The low-sulfur diesel has the potential to reduce NO_x emissions by 50 percent.
- Require the use of aqueous or emulsified diesel fuel for all diesel equipment. Aqueous diesel formulations have received interim verification by the CARB and show a reduction of 16 percent in NO_x and 60 percent in PM₁₀ from diesel exhaust. ((Information on aqueous diesel fuel formulations can be found at: <http://www.arb.ca.gov/fuels/ddiesel/altdiesel/altdiesel.html>, http://www.lubrizol.co/PuriNox/markets_distributors.asp, <http://www.cleanfuelstech.com/Customers/Customers.htm>.)
- Use electricity from power poles instead of temporary diesel- or gasoline-powered generators. (>95% RE)
- Cover trucks hauling dirt, sand, gravel or soil.
- Redirect truck route to avoid residential areas or schools.
- Use light-colored roof materials to deflect heat.
- Install energy-efficient appliances to reduce energy consumption.

Other mitigation measures for consideration by the lead agency to reduce potentially significant construction and operation emissions can be found in Chapter 11 of the SCAQMD's Handbook.

2. **On-Site Buildings and Soil Contamination:** On page 3E-4 of the DEIR the lead agency states that since the commercial and residential structures on the project site predate 1978, the structures may contain both lead-based paint (LBP) and asbestos containing materials (ACM). According to the lead agency, "testing of shallow soils at the residential and commercial properties will be performed..." SCAQMD staff believes it is inconsistent with CEQA and inappropriate to defer to the future an important component of the proposed project that may substantially affect project emissions. Postponing this action deprives the public the opportunity to evaluate the adequacy of the mitigation measures to reduce the project's air quality impacts. SCAQMD staff therefore recommends that the studies be performed and the measures to

reduce the emissions be included in the DEIR prior to its certification. The lead agency is reminded that if there is asbestos in the existing structures, the lead agency will be required to comply with SCAQMD Rule 1403 – Asbestos Emissions From Demolition/Renovation Activities.