

Inglewood



California

PLANNING AND BUILDING DEPARTMENT

February 3, 2010

Via fax and USPS

Mr. Ronald Kosinski, Deputy District Director
California Department of Transportation
Division of Environmental Planning (405 Arbor Vitae Interchange)
100 South Main Street MS 16A
Los Angeles, CA 90012

Subject: Environmental Assessment/Initial Study for the I-405 south-half interchange at Arbor Vitae

Dear Mr. Kosinski:

Thank you for the opportunity to comment on the Environmental Assessment and Initial Study for the I-405 south-half interchange at Arbor Vitae in Inglewood. We provide you with the following comments:

The Land Use and Noise analyses appear to be adequate. The Air Quality Analysis (and related traffic) is not adequate. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an environmental assessment or mitigated negative declaration must be reviewed in light of what is reasonably feasible. In the EA/Mitigated Negative Declaration, Caltrans has concluded that the interchange project would not have a significant impact on air quality because there will be an overall reduction in traffic volumes and EPA will call for MSAT (Mobile Source Air Toxics) emissions reductions by at least 57 to 87 percent through 2020. However, this does not address local air quality impacts and in particular dispersion of local mobile source emissions—namely ROG (reactive organic gases), NOX (nitrogen oxide) that are precursors of ozone during construction and project operation. EPA has designated the South Coast Air Basin (SCAB) that includes Inglewood as Severe-17 non-attainment for ozone, serious non-attainment for PM10, and non-attainment for PM2.5. The document needs to describe direct construction emission sources from equipment exhaust or fugitive dust and construction worker trips. Will significant grading (pushing and scraping) or excavation (digging and scooping) that requires removal

of earth, concrete or other materials be conducted? Also if the interchange creates an opportunity to add an additional lane this will affect air quality impacts for freeway motorists. The document should identify the amount of hectares that will be disturbed, the number of construction days and review these against CEQA guidelines issued by SCAQMD (South Coast Air Quality Management District).

The document indicates that it cannot determine the number of construction worker trips. Therefore, it should not make a generalized conclusion that impacts will not occur. The document should rely on CALTRANS protocol to determine a reasonable number of construction worker trips. Direct emissions of CO, NOX, ROG, SOX, and PM10 could exceed daily significance thresholds during construction. Impacts to sensitive receptors near construction areas would be inversely proportional to distance and would decrease with distance from the source. However, there is no way to determine if reasonable dispersion near residential areas would occur since dispersion modeling or analysis was not performed and also since there is no stated estimate of construction workers. The EA in effect applies less than a general regional air quality analysis to evaluate project-specific impacts. Further evaluation must be conducted of the project specific area in or near Inglewood.

Also, there could likely be some correlation between the Hollywood Park Redevelopment Project (2009) and project impacts to sensitive receptors during both construction and project operations. CALTRANS was given a copy of the Hollywood Park DEIR and asked to reflect this in their final analysis. That project should be designed and under construction during 2013-2020. Use of that project's diesel equipment /vehicles and Arbor Vitae should be considered.

The City previously requested that CALINE 3 or a similar dispersion model be used and CALTRANS responded that CALINE 3 has not been validated for use with pollutants such as mobile source air toxins (MSAT). (Also CALINE 4 has replaced CALINE 3). THE EA goes on to state "Dispersion models are appropriate for predicting maximum concentrations that can occur at some time at some location within a geographic area but cannot accurately predict exposure patterns at specific times at specific locations across an urban area to assess potential health risk." The document goes on to discuss research that is being conducted by the National Cooperative Highway Research Program but does not however, address the dispersion aspects of a dispersion model like CALINE4. Essentially, Caltrans determined that the project would not have a cumulative impact on air quality—although local air monitoring station data for 2005 and 2007 shows that ozone levels were exceeded for this location—two days in 2005 and one day in 2007. It is reasonably feasible that a Dispersion model OR similar model that measured maximum concentrations that could occur at some time in Inglewood could be modeled to address the issues of mobile source emissions--NOX and ROG. However, since traffic based NOX and ROGs are not examined in the document, the document should not have concluded that there would be no significant impact. Caltrans should disclose the amount of reactive organic gases

(ROG) and nitrogen oxides (NOX) that will result from project construction and operation to determine ozone impacts.

In conclusion, Caltrans must measure the project's ozone impacts based on empirical data that includes consideration of vehicle trips generated by the Hollywood Park project, not based on a general conformity discussion of the federal and local transportation conformity rule. Although the northbound off ramp at Arbor Vitae would provide congestion relief at the Century and Manchester 1-405 on/off ramps, the direct levels of vehicle traffic and MSAT occurring from added and diverted traffic vehicles was not "reasonably feasibly" considered in the document.

If CALTRANS cannot adequately capture cumulative traffic and air quality impacts that would affect Inglewood from introduction of a ½ interchange at Arbor Vitae in a mitigated negative declaration, then they should consider preparation of an EA/EIR that would gather local project information. An estimated number of the 22,520 daily trips anticipated to occur during Phases I and II of the Hollywood Park Project (30-35%) could be diverted from Century to the Arbor Vitae exchange, thereby providing an additional 6,756 to 7,882 trip ends using Arbor Vitae. Air quality and traffic impacts should be evaluated to determine level of service and impacts to the regional and local air quality and transportation plans.

Also, climate-protective legislation, including AB 32, which calls for the state to significantly reduce greenhouse gas emissions, needs to be contained in the document. There is some discussion of climate change strategies but these may not go far enough. The California Office of the Attorney General has established recommended measures for projects to mitigate greenhouse gas emissions. It is the position of the State Legislature (as expressed in its adoption of AB 32, The California Climate Solutions Act of 2006) that global climate change poses significant adverse effects to the environment of the State of California and the entire world. Specifically, the document should look at compliance with the following executive orders:

- 2010: Reduce greenhouse gas emissions to 2000 levels;
- 2020: Reduce greenhouse gas emissions to 1990 levels; and
- 2050: Reduce greenhouse gas emissions to 80 percent below 1990 levels.

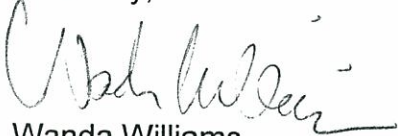
Compliance with Executive Order 12898 (Environmental Justice) cannot occur until the air quality and traffic analysis are complete.

RECOMMENDATION: I recommend that the City request that the document reflect additional air quality, traffic and greenhouse gas emissions analysis that is based in part on the eventual construction and operation of the Hollywood Park project.

We are attaching a petition signed by Inglewood residents submitted by the office of Council Member Eloy Morales (District 3).

Thank you again for the opportunity to comment. If you have any questions, please contact Mindy Wilcox, Senior Planner at (310) 412-5230.

Sincerely,

A handwritten signature in cursive script, appearing to read "Wanda Williams".

Wanda Williams
Acting Planning and Building Director

CC: Tim Wanamaker, City Administrator
Sheldon Curry, Assistant City Administrator
Darryl Brown, Executive Assistant to the Mayor

