



Environmental Subject Working Group

September 14, 2009

Gateway City Council of Governments Offices, Paramount

MEETING SUMMARY

INTRODUCTION

On Monday, September 14, 2009, the I-710 Project Team met with the Environmental Subject Working Group (ESWG) at the Gateway Cities Council of Governments offices in the City of Paramount. The purpose of the meeting was to:

- Update the group on project status since the last meeting of the ESWG on August 18, 2009 including progress by the environmental, engineering, and community participation teams.
- Develop the group's recommendations on specific focus areas to convey to the Corridor Advisory Committee (CAC).

ESWG members in attendance were Angelo Logan (Commerce LAC and CAC); Andrea Hricko (USC, Keck School of Medicine); Paul Simon (LA County Department of Public Health); and David Randall (Montebello Unified School District). Other meeting attendees included Ian MacMillan (Los Angeles Unified School District); Adrian Martinez (NRDC); Lou Baglietto (Butterfield Communications); and Karl Rodenbaugh (The Planning Center).

In attendance from the Project Team were Ernest Morales and Devon Cichoski (Metro); Garrett Damrath (Caltrans); Jerry Wood (GCCOG); Cecilia Moreno (Port of LA); Jack Waldron and Julie Rush (URS); Rob McCann and Jayna Goodman (LSA); Julia Lester (ENVIRON); Pat McLaughlin and Jesse Froehlich (MIG).

MIG facilitator Pat McLaughlin called the meeting to order and began with a round of self-introductions. She briefly reviewed the agenda for the evening, which would focus on developing recommendations for the CAC related to the topics of significance thresholds, construction impacts, and near-source modeling.

Ms. McLaughlin introduced Ernest Morales of Metro, Project Director for the I-710 Corridor Project EIR/EIS, who provided an introduction to the meeting and a state-of-the-process report. To date, Metro has delivered several presentations and products to the ESWG that outline the Project Team's approach to the I-710 Corridor Project EIR/EIS, most notably related to the Air Quality/Health Risk Assessment (AQ/HRA) protocol. Mr. Morales explained



Metro



that the ESWG's recommendations will be presented to the CAC, who will, in turn, make their recommendations to the Project Committee. He recognized key differences between the Project Team's established protocol for the AQ/HRA and the ESWG's expressed views of how the protocol should be changed. Main areas of discussion have included significance thresholds, modeling of construction-related air quality impacts, and near source modeling. Mr. Morales stated that Metro has made all of the suggested changes from the advisory groups that were possible to make at the staff/agency level. The assessment is based on what Metro believes to be the best available science, and conforms to established regulations.

The ESWG, as an advisory group, can present findings that differ from the Project Team's recommendations and protocol, and ask the CAC to make recommendations to the Project Committee. He assured members that recommendations will be transmitted to the CAC, and, if approved by the CAC, to the Project Committee alongside the Project Team's recommended protocol and any recommendations from the Technical Advisory Committee. He shared that the Project Committee and the Executive Committee are the ultimate advisors to the Funding Partner agencies on policy decisions for the I-710 project.

- ESWG member Andrea Hricko requested a copy of Mr. Morales' report. She then expressed concern regarding Mr. Morales' statement that the AQ/HRA uses the "best available science." She noted that there are numerous studies on near-roadway impacts, including the impacts to residents, visitors, and employees in close proximity to freeways.
 - Julia Lester of ENVIRON clarified that the existing setting section of the EIR/EIS will include information about near-roadway impacts, consistent with the commitment to include information on the latest health studies. The Project Team agrees that there are numerous peer-reviewed scientific studies concerning near-roadway impacts. The issue is that without technical consensus and appropriate guidance, the Project Team cannot do a specific quantitative analysis of the near-roadway concentrations or the associated health risks beyond the AERMOD modeling in the Protocol.
- Ms. Hricko asked why the Project Team could not conduct a quantitative near-roadway MSAT analysis.
 - As described in the AQ/HRA Protocol, AERMOD will be used to model concentrations from the I-710, yet there are technical concerns as to whether that model captures the effects immediately adjacent to the freeway (within 25 to 150 meters). Dr. Lester explained that there is a lack of consensus among technical experts about the appropriate model—or if there is an appropriate model and methodology—to model specifically for air quality impacts very close to the freeway.
- ESWG member Angelo Logan inquired who determines standards for near-roadway air quality modeling. He asked what the limitation is to using developed but not approved models. Mr. Logan referenced the Air Resources Board's risk assessment under the Memorandum of Understanding for the rail yards.
 - Dr. Lester clarified that EPA and FHWA have been investigating this situation for a number of years. She explained that the limitation is a lack of consensus between agencies. There are several different air quality models and the technical models are in the process of being tested. ENVIRON is familiar with

the railyard assessments; ARB approved ENVIRON's emission inventory and air dispersion modeling methods used for the railyards under the MOU.

- Ian MacMillan of the Los Angeles Unified School District noted a volume source spacing issue, which is a typical problem with air quality models. He suggested strategically placing volume sources to avoid source spacing issues.
 - Dr. Lester explained that the Agency Air Technical Working Group discussed the modeling options last December. The Protocol methodology was developed as a result of this discussion. There are data limitations for doing near-source modeling, including the type, resolution and quality of data from the traffic modeling.
- ESWG member Paul Simon asked if qualitative information is included in EIR/EIS. Since quantitative analysis is limited, will there be a judgment made about sensitive receptors in the project area, especially related to mitigation and analysis of the alternatives?
 - Dr. Lester responded that, yes, there will be a qualitative analysis included for both PM mortality and ultrafines.
- Ms. Hricko asked if the modeling decision is a political decision.
 - Dr. Lester explained that there is not enough technical information available for a technical consensus on an additional near-source model for this project, so at this point it is truly a technical, and not a political issue.
 - Ms. McLaughlin reiterated that Ron Kosinski from Caltrans had stated that FHWA and EPA are currently working through these issues on the technical level.
- Mr. Logan noted that there many different ways to do this technical air quality modeling.
 - Dr. Lester affirmed that there are several methods and they are in an active development and review phase.

PROJECT UPDATES

Environmental

Rob McCann of LSA gave a brief status update on the technical studies that are used to analyze the three Build Alternatives against the 2008 baseline scenario and the projected 2035 No-Build Alternative. The environmental team is currently in the process of defining baseline conditions and the affected environment for the project, and is expected to finish this process by the end of September 2009. The engineering team has been developing packages of geometric plans and corresponding traffic analyses, enabling the environmental team to initiate impact analysis for packages that have been completed. The next step will be to analyze the impacts of each of the alternatives. There is significant collaboration between the environmental and engineering teams during this phase, as geometric plans and traffic modeling feed into the environmental studies.

- Mr. MacMillan inquired about recent port forecasts and expected changes to the study based on reduced port cargo volumes. Will this information be included in the traffic study?
 - Mr. McCann explained that the traffic forecast is based on 2035, which is a long-term forecast. In the short-term, port cargo volume is down, but the ports have done a review and confirmed the growth projected for 2035 to be valid.
 - Jack Waldron of URS added that the port forecasts are capacity-based, and capacity is not affected by the current downturn in volume.

Mr. McCann addressed the AQ/HRA, noting that the technical team is taking the standard emissions factors determined by the EMFAC program and modifying those to reflect the ports' clean truck project. In developing the model, there is ongoing coordination with the engineering team regarding geometric plans, traffic volume, and speed data.

Mr. McCann reminded meeting participants of the last meeting during which participants raised concern regarding Caltrans' use of SCAQMD's CEQA significance thresholds, and analysis of construction impacts. Caltrans is working to develop a more specific description of how CEQA significance determinations will be made. Caltrans, Metro, and GCCOG have presented material to the SCAQMD. The results of these meetings will be reported to the ESWG once SCAQMD has reviewed and responded to the Project Team's materials.

Most field work and mapping is complete for the biological resources studies, and the team is working on delineation to determine impacts to jurisdictional waters, including the Los Angeles River and its tributaries. The cultural resources team is starting to investigate potential resources, including historical resources, in the corridor. The Draft Initial Site Assessment addressing hazardous waste impacts is currently in development. Obtaining rights of entry for field work is in process and expected to be complete by the end of September.

Caltrans is responsible for preparing the Noise Impact Study. They are gathering data on existing noise conditions within the corridor, drawing on data collected for the Long-Life Pavement Rehabilitation Project. The Community Impact Assessment (CIA), of which an overview was presented to the ESWG in June, is in process. The technical team is working with the outreach team to distribute the community profiles to the LACs, and with GCCOG to distribute them to the TAC for their input.

In July the ESWG also had a focused discussion regarding the Environmental Justice component of the CIA, which is being refined currently based on their input, and the team will move into the assessment phase soon. LSA is currently working with the team's landscape architecture firm to conduct the Visual Impact Assessment, which will involve input from the Community Design Subject Working Group (CSWG) regarding visual impacts. The cumulative analysis includes a list of transportation, land development, and port projects, and is currently being developed for inclusion in the document.

Mr. McCann noted that the CAC has requested preliminary findings, and he anticipates bringing these findings to the CAC and the SWGs before the end of the calendar year.

- Ms. Hricko inquired about the possibility of creating a physical model of the proposed project. She is curious as to how the double-decked portion of the project relates to other local structures.
 - Mr. McCann explained that the technical team will be developing a number of visual simulations that will illustrate before-and-after conditions. He confirmed that with current technology, these visual simulations can be quite accurate and are developed to scale. A narrative will identify profile and height as compared to other portions of the project.

Engineering

Mr. Waldron continued with an update from the engineering team, stating that major activities include the on-going development of the geometrics and traffic operations analysis. The team is working through the project segment by segment. They have completed a number of segments to date. The traffic team provides their analysis to the highway design team, who has taken the updated traffic figures and is modifying the geometrics as needed to address these figures, in addition to other comments received.

The team is also addressing major utility coordination issues with a focus on the major utilities, including Southern California Edison and Los Angeles Department of Water and Power. Modifications to high voltage lines have been proposed, and these, in turn, affect the Los Angeles River and levee. The team is coordinating with the LA County Flood Control District and the Army Corps of Engineers to communicate any proposed modifications to the river.

By early November, the team anticipates completing the value engineering process, which is a standard Federal Highway Administration/Caltrans procedure that looks at ideas that could save money on the project while still meeting the purpose and need.

Refinements to the preliminary geometric designs are in progress, and each package is issued to the Funding Partners and the TAC for review as it is completed. Once comments are provided to the technical team, sub-TAC meetings are conducted for presentation of geometric refinements. Geometrics are being developed for each of the alternatives and included in the preliminary plans will be issued in the form of a report.

Geometric review meetings are tentatively scheduled to occur in September and throughout October 2009. LACs are interested in moving forward with early action projects, particularly soundwalls and safety improvements. With regard to candidate early action projects, the technical team is striving to be consistent with Measure R funding requirements. The consultant team has developed a report with potential candidate projects for decision-makers to use as a basis for identifying early action projects. The report was provided to the TAC on August 6, 2009. One of the agenda items for the September 16 TAC meeting is to further discuss early action projects and to come up with a possible process for confirming a list of such projects.

- Mr. Logan asked how the list of potential early action projects was identified. He wondered if the LACs had been involved in the process, suggesting that this is an opportunity to see what the priorities are at the local level.
 - Mr. Waldron explained that the current candidate project list was developed through a combined effort of the consultant team and the Gateway Cities GOG. Projects were identified along the lines of basic criteria such as independent utility of each project, and ability to provide interim safety improvements on the corridor. The team looked at the entire alignment and determined projects that could proceed prior to the mainline construction. Mr. Waldron agreed that representation from the local jurisdictions and the LACs will be important in honing the list.

Mr. Waldron concluded by reporting on the coordination with the I-710/I-5 interchange. The team is in the process of developing revised geometrics for the segment south of the I-5 interchange, which will address comments received from local jurisdictions and the Federal

Highway Administration. The team has revised the concepts and will meet with local agency representatives and railroads, and follow up with FHWA. The team conducts ongoing meetings with Caltrans regarding the interface of the two projects.

- Ms. Hricko noted her understanding that portions of the freight movement corridor will be elevated over the Los Angeles River with support structures in the river.
 - Mr. Waldron explained that the team looked at numerous designs corresponding to the option of relocating the high voltage power lines. The proposed project requires a larger footprint than the existing I-710 corridor, which encroaches on the utility corridors and could potentially impact the Los Angeles River. Relocating power lines under the freight corridor has gotten a positive response as a solution that would reduce or eliminate impacts to the Los Angeles River where possible. Where undergrounding is not possible, the current proposals do locate high voltage lines on the levee, and not over the river itself or where water is flowing. Bike lanes will not be impacted.
- Mr. Logan requested a presentation of the entire stretch of the corridor.
 - Mr. Waldron offered to present visuals as the refined segments are developed. He explained that the team is planning to develop 3-D simulations for certain portions of the corridor. These sections will likely represent portions of particular interest to the community.
- Mr. MacMillan asked if the candidate early action project list is available online.
 - Mr. Waldron explained that it is a draft list of candidate early action projects and is not formalized. The TAC will discuss the draft list on Wednesday September 16, 2009.

Community Participation

Pat McLaughlin of MIG gave a brief update on community participation. Ms. McLaughlin noted that the project team will enter into meetings with LACs this fall. LAC members will review community profiles, the Community Impact Assessment, geometrics, candidate early action projects, and the cumulative projects list.

She explained that the team will be meeting with the TAC to share the ESWG's work and input to-date. The TSWG has specifically asked for a tutorial on the decisions behind the geometrics and the traffic studies related to these geometrics. The TSWG also requested a report from the ports about how the economic climate has affected them and their cargo forecasts, as well as an update from SCE on power supply related to the proposed alternative goods movement technologies. The CSWG will meet to discuss aspects of the Visual Impact Assessment, and also community enhancement, community design features, and historic structures.

At their last meeting, the CAC received an overview of the environmental studies and the Community Impact Assessment. At future meetings, the CAC will be looking at some of the SWG findings, and has requested a presentation on Alternative 6B. The CAC will also be receiving a presentation on the TAC's current deliberation on the candidate early action project list.

A new newsletter was recently distributed, and the project team is also in the process of developing a corridor-wide brochure that highlights the character and history of the communities along the I-710 corridor

- Ms. Hricko expressed concern over the infrequency of LAC meetings, with the exception of the Commerce LAC. Should the community participation team work with elected officials to organize and facilitate input from the other LACs?
 - Devon Cichoski of Metro explained that some LACs have been active, including Commerce, South Gate, Carson, and Vernon. There are also meetings in Long Beach on a regular basis. Most LACs have not met since April due to a lack of project work with community-specific relevance over the summer.. Beginning in October, the LACs will be reviewing updated geometrics and draft community profiles. Another set of cities including: Cudahy, Bell, Bell Gardens, Lynwood, and Huntington Park have decided to have small advisory committees consisting of one or two people. Paramount is using its existing Public Safety Commission as its LAC. Each committee's make-up is unique and is determined by the local elected officials of that city.

DEVELOPMENT OF ESWG FEEDBACK TO THE CAC

Ms. McLaughlin drew ESWG members' attention to printed worksheets, one for each of the three topics that the ESWG had requested to discuss: significance thresholds, construction impacts, and near-source impacts. She noted that each worksheet includes the Project Team's encapsulation of the context surrounding the issue, including a summary of the ESWG discussion to-date.

Significance Thresholds

Ms. McLaughlin directed participants' attention to the worksheet on significance thresholds, containing the following text:

Context

Caltrans statewide policy dictates that significance thresholds are determined on a case-by-case basis. For the I-710 Corridor Project EIR/EIS, the AERMOD model will be used to calculate the incremental air quality and health risk change between each of the 2035 Project Alternatives (including the 2035 No Build Alternative) and the CEQA Baseline (2008). Per Caltrans policy, the number of benefited receptors will be compared to the number of adversely affected receptors to provide an overall determination of project impacts. Caltrans will review SCAQMD significance thresholds and others when determining the overall impact of each project alternative.

On June 18, 2009, the CAC made the following recommendations related to significance thresholds:

- *Adopt SCAQMD's air quality significance thresholds for the evaluation of alternatives in the I-710 Corridor Project EIR/EIS.*
- *Hear expert legal opinions from others (for example, SCAQMD) that are counter to Caltrans' legal stance on determining significance thresholds.*

Summary of ESWG Discussion to Date

ESWG members have advocated for the adoption of SCAQMD significance thresholds for the I-710 Corridor Project EIR/EIS for the following reasons:

- *The credibility of study conclusions is dependent on the pre-determination of significance thresholds.*
- *The entire I-710 study area lies within the South Coast Air Basin, so SCAQMD standards are relevant to the project.*

Ms. McLaughlin explained that the summary text is available for ESWG members to work with, and invited ESWG members to begin to develop their recommendations and feedback related to significance thresholds. Jesse Froehlich of MIG recorded topic-related discussion points on an electronic version of the worksheet, which was projected onto the wall at the front of the room. She invited ESWG members to adjust the recorded wording as desired to formulate a final recommendation or other form of feedback to the CAC.

- Regarding the CAC's recommendation to adopt the SCAQMD significance thresholds, Mr. Logan asked how the group would like to move forward. He suggested inviting SCAQMD to present their position on significance thresholds and then to share this information with the Project Committee. He also suggested inviting opinions from other stakeholders or groups, such as NRDC.
 - Ms. McLaughlin suggested that hearing the SCAQMD's position would be a way to move forward. She suggested the following language: "solicit/invite other viewpoints on significance thresholds," in reference to Caltrans' policy that significance thresholds cannot be pre-determined.
 - Mr. Logan suggested that the ESWG concur with the CAC's first recommendation listed above.
 - ESWG member David Randall supported adopting a threshold as it provides a baseline to work with. This recommendation supports the CAC's position—ESWG findings are contributing to the existing CAC recommendations. He speculates that Caltrans is at odds with SCAQMD.
 - Mr. Logan inquired how the group would facilitate the CAC's second recommendation listed above.
 - Mr. Randall asked what the group might do to flesh out the CAC's above recommendations. He elaborated on the complexity of working with three different entities—SCAQMD, Caltrans, and California Air Resources Board—that may not agree with each other. The ESWG needs to understand where each entity is coming from and then determine a baseline that each can work from.
- Mr. MacMillan asked for clarification on Caltrans' language that alludes to their decision-making process in determining significance. How is Caltrans defining benefited and adversely affected receptors?
 - Dr. Lester clarified by explaining that Ron Kosinski of Caltrans uses the term "receptors" rather broadly. Caltrans determines significance on a case-by-case basis, precisely because not all receptors are equal, as Mr. MacMillan had suggested. The presentation, based on this feedback, will be edited to be more precise with the use of the term "receptors."
 - Dr. Simon asked for clarification as to whether Caltrans' policy could be summarized as "picking the alternative with the least harm."
 - Mr. McCann reminded the group that the environmental document must evaluate the alternatives in comparison to the CEQA and NEPA baselines. The example

scenario that Mr. Kosinski has asked the group to consider in the past is one where 10 homes are affected adversely and 10,000 experience benefits. Would that be considered a significant impact? Caltrans will review SCAQMD's thresholds in their determination of significance, but as a state agency and a lead agency, they do not have to adopt another lead agency's regional or local threshold as their own.

- Ms. Hricko shared her concerns over Caltrans' significance threshold policy and suggested that Mr. Kosinski organize a meeting between the ESWG and the appropriate experts from Sacramento and UC Davis.
 - In general, ESWG participants support Ms. Hricko's suggestions. The members reached consensus and moved to recommend that Caltrans and SCAQMD present to the CAC.

The ESWG recommendation was recorded on the projected worksheet as follows:

ESWG Recommendations:

- ESWG concurs with the above-listed CAC recommendations
- More specific wording for second recommendation:
 - Invite SCAQMD to present their position to the CAC
 - Request a Caltrans joint headquarters/district presentation to the CAC on Caltrans' methodology and rationale (from a legal and scientific perspective—including representative(s) from UC Davis)
 - Have an open invitation for other stakeholders (e.g. NRDC) to come forward with other opinions before the CAC.

Construction Impacts

Ms. McLaughlin shifted the group's attention to the prepared worksheet on construction impacts, which included the following text:

Context

The Project Team has stated that construction phasing cannot be determined until a project alternative is selected and funding identified. Without specific information as to location and construction activity scheduling, the level of detail necessary for a full AQ/HRA assessment of construction activities is not available. A construction emission estimate and project-specific mitigation measures for construction-related air quality impacts will be included in the EIR/EIS per Caltrans' Standard Environmental Reference (SER).

On June 18, 2009, the CAC requested that the ESWG discuss the topic of construction impacts to help them formulate a recommendation for the Project Committee. The CAC did not reach a consensus on the issue of construction impacts.

Summary of ESWG Discussion to Date

- *Because of the anticipated duration of construction, which spans up to two K-12 cycles of school children, the ESWG has expressed the utmost importance of analyzing construction impacts in the I-710 EIR/EIS.*
- *The ESWG believes air quality and health risk impacts should be quantified using a reasonable worst-case scenario and full dispersion modeling.*

Before beginning discussion, Ms. McLaughlin opened the floor up to questions.

- Mr. MacMillan asked how construction impacts are being evaluated. The group agreed that they would like to hear from Dr. Lester.
 - Dr. Lester directed ESWG members to the AQ/HRA Protocol Table 3.1.A that includes the analysis that will be completed. The team is also following the Caltrans SER (Standard Environmental Reference), which calls for the quantification of construction emissions based on the information that is available. Measures will be proposed and incorporated into the EIR/EIS to avoid, minimize, or mitigate construction-related impacts. Table 3.1.B includes analysis that is not being done, including a full dispersion modeling of the air quality health risk assessment of particular construction activities.
 - Jerry Wood explained that the GCCOG would like to leverage the Measure R funds for developing construction plans. He indicated that it would be helpful to wait until the staging plans are complete to determine the appropriate phasing, and subsequently, air quality assessment methodology.
- Mr. Logan reported on the CAC's discussion on this issue, noting that the CAC did not reach consensus on this issue because some members agreed with the Project Team that it would be premature to develop impact assessment methodology before the construction staging is determined. Mr. Logan believes that without the necessary information, a reasonable worst-case scenario is the best information that we have to evaluate air quality impacts in the EIR/EIS.
 - Ms. McLaughlin asked the group what they would define as the worst-case scenario.
 - Mr. Logan suggested evaluating construction impacts liberally to determine the worst-case scenario.
 - Mr. MacMillan suggested that the technical team could use existing available crude data, accepting default assumptions.
 - Mr. Wood explained that at the end of the year, URS would do a staging plan based on the revised geometrics, and determine how to build the project. Then, based on this information, Caltrans and the technical team can determine how to move forward with analysis. He explained that most freeway projects are built one interchange at a time. The technical team needs to wait until there is more information about the construction plan, and then determine what that information means.
- Dr. Simon asked Mr. Logan to clarify his concern; he wondered if it is that construction impacts would be taken into consideration in the selection of the project alternative.
 - Mr. Wood clarified that staging plans will be available before an alternative is selected. As has been explained by many team members, construction analysis has always been included in the EIR/EIS—we simply don't have the information at this point to assess impacts in the manner described by ESWG members (e.g., detailed dispersion modeling).
 - Dr. Lester expressed that it seems the group is envisioning something beyond the Caltrans SER. She stated that it is important to have sufficient amount of technical information to assess construction impacts. When the staging and phasing information becomes available, the technical team would need to loop back and determine what kind of analysis is technically feasible.

Ms. McLaughlin asked the group how they would formulate a recommendation, based on the points that had been discussed. She summarized that the group is interested in having the health impacts of construction considered in the ultimate analysis, and potentially in the selection of the alternatives. Mr. Wood has explained that construction staging is necessary to inform the process, which is scheduled to be completed near the end of 2009. Dr. Lester would then have to evaluate the staging information, and determine whether there is enough information to do the analysis that the committee recommends. Some ESWG members have suggested they would be willing to wait on this issue, as long as there was assurance that the issue would be dealt with adequately when the appropriate information becomes available.

- Dr. Simon summarized that there will not be any major decisions made about the project alternatives without the construction analysis and that it may not be technically feasible to incorporate the construction impact analysis into an HRA. He asked if SCAQMD would be included in the decision-making process as the appropriate experts on the issue.
 - Mr. Wood explained that SCAQMD is involved, and that more information is forthcoming.
 - Mr. Logan noted that SCAQMD had suggested analyzing a worst-case scenario.
 - Mr. Wood responded that the worst-case scenario has still not been defined by SCAQMD. He underscored the immensity of the project, which spans 18 miles of corridor
- Ms. Laughlin suggested the ESWG recommendation may be for the full construction impacts to be addressed from a health perspective, but to include wording that we may need to wait for the staging plan, which will inform the final decision on the project.
 - Mr. Logan added that he would like the construction staging information to be included in the Health Risk Assessment, which is included in the full EIR/EIS.
 - Dr. Lester further clarified that after the staging plan is complete, there has to be a separate determination about whether or not there is sufficient information to conduct a quantitative HRA. She will need to get back to the group on this point after the staging information becomes available.
- Ms. Froehlich read the major discussion points she had recorded regarding construction impacts and the group's recommendation:
 - How to make the community feel confident that the construction impacts will be sufficiently analyzed in the selection of project alternative when information becomes available, and, furthermore to ensure that construction impacts are considered in the health risk assessment.
 - Defining worst-case scenario: mapping out phasing and staging; estimating impacts (there may be off-the-shelf default estimates that exist); request that SCAQMD advise on this issue.

The ESWG recommendation was recorded on the projected worksheet as follows:

ESWG Recommendation:

- Address full construction impacts from a health perspective when staging plan is complete. Include this analysis in the HRA and in the EIR/EIS to the degree technically feasible.

Near Source Impacts

Ms. McLaughlin noted that near-source modeling was the next discussion topic, although there would not be sufficient time left in the meeting to fully address this topic.

- Mr. Logan shared that the City of Commerce has been concerned about near-source impacts. He presented a proposal referencing EPA Rule 40CFR Section 93.123 that requires the determination of a baseline for air quality at hot spot locations. He proposed the following:
 1. Determine a baseline at hot spot locations;
 2. Estimate the additional pollution that will result from the proposed project by calculating and comparing the ratios of traffic and future traffic, after the project opens for service;
 3. Add the expected change in air quality from the vehicle emissions to the baseline;
 4. Compare the results to the air quality of the federal air standards; and,
 5. Identify the hot spot receptors where there are greatest impacts.
- Dr. Lester noted that Mr. Logan's suggestions resemble the conformity regulation, and in particular the hot-spot assessment under conformity. If that is the case, FHWA and EPA have established guidance for those assessments (including a quantitative assessment for CO and a qualitative assessment for PM10/PM2.5), and the I-710 Project AQ/HRA Protocol is consistent with that guidance.
- Mr. MacMillan wondered if that analysis does cover all near source impacts, including ultrafines, for example, which may or may not correlate with CO and PM 2.5.
- Adrian Martinez of NRDC suggested that the concern may be related to dissatisfaction with how this issue was dealt with in the SR-47 EIR/EIS, and that the group may want to work offline to prepare more extensive questions and comments.
 - Mr. Logan suggested that group members work with this issue offline and revisit the recommendation at the next meeting.

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The group agreed to continue the development of their recommendation on this topic at the next meeting. The following rough discussion points were recorded on the projected worksheet to inform the continued discussion:

Additional Comments, Data, Opinions, and/or Recommendations:

- Per Commerce LAC: (1) determine baseline of air quality at hot spot locations; (2) estimate additional pollution resulting from proposed project by calculating and comparing the ratios between current and future traffic after project opens for service; (3) add expected change in vehicle emissions; (4) compare results in AQ with Federal clean air standards and identify hot spot receptors where there are greatest impacts.
- Concerns based on how SR-47 conformity analysis was conducted
 - How do we determine baseline?
- ESWG to discuss this issue (offline) and revisit at the next meeting.

CONCLUSION

Requested Actions

Ms. McLaughlin recapped the action items that had been discussed earlier in the meeting:

- Take the candidate early action projects to the LACs for their consideration
- See visual models or presentations on the entire proposed highway alignment

Future Meetings

The group requested the following agenda topics for the next meeting:

- Progress report on the Noise Impact Study, including data and methodology
- Continued development of the recommendation on near source modeling

The group requested that the next meeting be held prior to the next CAC meeting, and not on a Monday due to member schedule conflicts.

Ms. McLaughlin adjourned the meeting at 8:30 p.m.

Addendum 1

Introductory Remarks by Ernest Morales, Project Director

- To date we have given the ESWG several presentations and technical documents outlining how the Project Team is approaching the EIR/EIS for the I-710 project, including the AQ/HRA methodology.
- The focus of tonight's agenda is on assisting ESWG as its members prepare a set of recommendations that will be forwarded to the CAC.
- The CAC will review these recommendations and, in turn, make their own recommendations to the PC.
- We acknowledge that there continue to be some key differences between the Project Team's established methodology for the AQ/HRA and ESWG views of how the methodology should be changed.
- The main areas of discussion have been significance thresholds, modeling of construction-related air quality impacts and near-source modeling.
- We have made all the suggested changes to the AQ/HRA from the advisory groups that we felt were possible to make at the staff/agency level and we appreciate the ESWG's valuable input.
- At the same time, it is our duty as public agencies to explain that 1) our AQ/HRA methodology is based on what we believe to be the best available science and 2) we are obligated to conform to state and federal policies and regulations.
- At the end of this process, we must create a defensible environmental document that confirms to these established regulations.
- As a project team, we will continue to recommend our AQ/HRA methodology as the best way to accurately analyze project-related air quality impacts in a way that satisfies these legal and regulatory requirements for the state of CA and the federal government.
- While we would like to achieve consensus as to approach, the ESWG, as an advisory group, can make findings that differ from the Project Team's recommendations and ask the CAC to carry forward findings or recommendations to the Project Committee that differ from the Project Team's approach and methodology. This can include recommendations for variance from established statewide or even federal policy and regulation.
- Any recommendations you make today will be faithfully transmitted to the CAC and, if approved by the CAC, to the PC alongside the Project Team's recommended methodology and any recommendations from the Technical Advisory Committee.
- The PC and the EC are the appropriate settings where policy-level decisions are made for the I-710 project.