UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

April 7, 2011

Mr. Ray Tellis
Federal Transit Administration
Los Angeles Metropolitan Office
888 S. Figueroa Street, Suite 1850
Los Angeles, California 90017

Subject: Supplemental Draft Environmental Impact Statement for the Crenshaw/LAX Transit Corridor Project, Los Angeles, California (CEQ #20110054)

Dear Mr. Tellis:

The Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act. We previously reviewed the Draft Environmental Impact Statement (DEIS) for the project and provided comments in an October 26, 2009 letter. We rated the DEIS as EC-2, *Environmental Concerns, Insufficient Information* due to concerns about the air quality analysis for the project. We look forward to a discussion of those issues in the Final Environmental Impact Statement (FEIS). We are rating the SDEIS as LO, *Lack of Objections*. Please see the attached *Rating Factors* for a description of our rating system.

While we have a lack of objections to the project elements (maintenance facilities) discussed in the SDEIS, we have a few recommendations regarding selection of the facility site and future construction:

- EPA encourages the Federal Transit Administration (FTA) and the Los Angeles County Metropolitan Transportation Authority (LACMTA) to avoid and minimize impacts to schools and other sensitive land uses and receptors in site selection and mitigation activities.
- Due to unavoidable construction impacts to air quality and potential cumulative impacts if other construction projects take place during the same time and in the vicinity of this project, EPA encourages FTA and LACMTA to maximize use of mitigation measures to minimize these impacts, especially in the vicinity of sensitive receptors.

- As stated in our comments on the DEIS, considering the existing impairment of local water bodies, EPA encourages aggressive efforts to manage stormwater runoff to minimize additional introduction of pollutants, including use of "green infrastructure" in onsite stormwater management. We commend FTA and LACMTA for committing to treatment control best management practices (BMPs), monitoring of those BMPs to ensure effectiveness, and employing green infrastructure strategies.

We appreciate the opportunity to review this SDEIS. When the FEIS is released for public review, please send one hard copy and one electronic copy to the address above (mail code: CED-2). If you have any questions, please contact Carolyn Mulvihill, the lead reviewer for this project, at 415-947-3554 or mulvihill.carolyn@epa.gov.

Sincerely,

Connell Dunning

Connell Dunning, Transportation Team Supervisor
Environmental Review Office

Enclosures:
Summary of EPA Rating Definitions

cc: Roderick Diaz, Los Angeles County Metropolitan Transportation Authority
Ray Sukys, Federal Transit Administration
Steve Smith, South Coast Air Quality Management District