



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

FAXED: APRIL 14, 2005

April 14, 2005

Ms. Pauline Lewicki
City of Los Angeles
Community Redevelopment Agency
354 South Spring Street, Suite 700
Los Angeles, CA 90013

Dear Ms. Lewicki:

**Draft Mitigated Negative Declaration (DMND) for
YWCA Job Corps Urban Campus: Los Angeles**

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 Mitigated Negative Declaration.

Please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final (Mitigated) Negative Declaration. The SCAQMD would be happy 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

Steve Smith, Ph.D.
Program Supervisor, CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS: CB

LAC050322-03
Control Number

**Draft Mitigated Negative Declaration (DMND) for
YWCA Job Corps Urban Campus: Los Angeles**

Project Emissions: Although the lead agency uses the URBEMIS 2002 model, a model approved for this use by the SCAQMD, the lead agency changes the model's defaults based on unsupported and unsubstantiated assumptions. These unsubstantiated assumptions are especially egregious relative to analysis of operational air quality impacts. The lead agency dismisses the possibility of trips associated with the proposed project by making vague assertions such as, "The proposed project is designed with the notion that individuals utilizing the proposed project would travel to and from the site via public transportation and/or on foot." (See page IV-11). This "notion" is unsupported by any supporting evidence or documentation. Another unsupported assertion regarding trips appears on page IV-62, "With respect to the 105 employees that would be working at the proposed YWCA Job Corps facility, it is anticipated that many of them would choose to utilize the public transit system rather than drive to and from work." This assertion is also unsupported by documentation. In the same paragraph on page IV-62, the lead agency acknowledges, "However, it is acknowledged that some of the employees may choose to drive to work." By relying on these unsupported assumptions the lead agency has not demonstrated that operational air quality impacts are not significant. It is requested that the lead agency provide supporting documentation for the assumptions made, such as a traffic study, or run the URBEMIS model and restore the defaults.