



# South Coast Air Quality Management District

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**FAXED: JULY 1, 2005**

July 1, 2005

Ms. Barbara Wu  
Los Angeles Unified School District  
Office of Environmental Health & Safety  
355 South Grand Avenue, 15<sup>th</sup> Floor  
Los Angeles, CA 90071

Dear Ms. Wu:

**Draft Environmental Impact Report (DEIR) for the  
East Los Angeles High School No. 2 and  
Central Region Elementary School No. 19  
(May 2005)**

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.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Environmental Impact Report. The AQMD 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  
LAC050517-08  
Control Number

**Draft Environmental Impact Report (DEIR) for the  
East Los Angeles High School No. 2 and  
Central Region Elementary School No. 19**

1. **Construction Emissions:** The air quality analysis for the construction emission lacks sufficient documentation and appears to be calculated incorrectly. The equipment listed in the text of the memo in Appendix B of the DEIR does not match the equipment listed in the estimated emission worksheets. Although the worksheets reference ARB Emissions Publication Number MO99\_32, there was insufficient information to validate the development of the emission factors used to estimate construction equipment emissions. It should be noted that emission factors presented in MO99\_32.5.xls are for individual model years. Fleet mix emission factors developed from population and equipment lifetimes should be used for emission estimates. In addition, it is not clear how the total daily emissions were developed from the hourly emissions since the hourly emission for the operation schedules in the appendix do not match. Preliminary estimates based on the equipment mix and hours of operations presented in Appendix B lead SCAQMD staff to be concerned that the significance conclusions may not be correct. The Final EIR should include a detailed description on the development of the construction emission factors and development of the emissions.
  
2. **Operational Emissions:** On page 3B-14 of the DEIR it is stated that operational air quality impacts were calculated using the URBEMIS 2002 model. It is implied that the model output file is in Appendix B. The URBEMIS 2002 output files should be included in the Final EIR. The URBEMIS 2002 files were provided to the SCAQMD after two requests to the lead agency. After reviewing the URBEMIS 2002 output files the SCAQMD staff has no further comment on this file. However, the SCAQMD staff requests that all air quality information including appendices and technical reports be provided along with the draft document on all future projects to avoid delays in completing review of the CEQA document.
  
3. **CO Hot Spots Analysis I:** The traffic volumes used in the CO hot spots analysis are not the same as the traffic volumes presented in the traffic section of the DEIR. In addition, morning peak traffic volumes were used in the CO hot spots analysis, even though evening peak traffic volumes are greater. The Final EIR should include traffic volumes consistent with the traffic section. The higher peak traffic volumes should be used in the CO hot spots analysis so as to present the worst-case scenario. This will enable the lead agency to identify all the possible mitigation measures available for reducing emissions should the concentrations exceed the state or federal standards.
  
4. **CO Hot Spots Analysis II:** The lead agency used the simplified screening method presented in the BAAQMD CEQA Guidelines, December 1999, to complete the CO hot spots analysis based on conversation with SCAQMD staff. Although SCAQMD staff is not opposed to using the BAAQMD simplified screening method if appropriate adjustments are made (e.g., use EMFAC 2002 instead of EMFAC 7F on-road mobile source emission factors), SCAQMD staff recommends that the lead agency use CALINE4 to analyze CO hot spots. The CO hot spots analysis should be completed

according to the methodology prescribed in Appendix B of the Transportation Project-Level Carbon Monoxide Protocol (CO Protocol) by the Institute of Transportation Studies, UC Davis, revised December 1997 on the following website:

<http://www.dot.ca.gov/hq/env/air/coprot.html>.

5. **CEQA Public Disclosure of Potential Toxic Sources:** State of California AB 2588, California Code 17213 and Public Resources Code 21151.8(a)(4) require school districts to identify potential toxics sites within ¼-mile of proposed schools. The sources, listed in Chapter 3D of the DEIR that were used by the lead agency to identify these potential toxics sources, do not include six sites identified in the SCAQMD data base of SCAQMD's stationary source-permitted facilities within ¼-mile of the proposed schools. The map and list of these permitted facilities are attached and should be included in the Final EIR for review by the public.

Tables 3D-1 and 3D-2 in the DEIR present facilities around the proposed high and elementary schools that generate hazardous wastes. These facilities are not presented in the list of facilities analyzed in the HRA. The lead agency states on page 3D-7 that no facilities were identified within a quarter mile of the proposed elementary school that might be reasonably anticipated to emit hazardous gases or handle hazardous or acutely hazardous materials, substances or wastes. Therefore it appears that Tables 3D-1 and 3D-2 contradict the conclusion in the text. The Final EIR should explain why this is not a contradiction or include the facilities in the HRA.

6. **Health Risk Assessment (HRA):** The lead agency addresses Section 15186 in the hazards hazardous material section of the DEIR. The section contains a summary of the results from the HRA. SCAQMD staff requested and received the HRA as a separate attachment from the DEIR. In the future, please include the HRA with all draft CEQA documents.

Risk calculations are presented in Tables 2 and 3 of the HRA. Methylene chloride is listed as emitted from BRM Brush Research manufacturing. Noncarcinogenic risk is estimated for the emissions. However, carcinogenic risk was not estimated. The final HRA should include the risk from methylene chloride.

7. **Asbestos Emissions from Demolition/Renovation Activities:** The footnote on page 3D-10 references the SCAQMD Rule 1403 Asbestos Emissions from Demolition/Renovation requirement for survey for the presence of asbestos prior to demolition or renovation. The text should also state that the requirements of Rule 1403 would be adhered to if asbestos is discovered during the survey or at any time during demolition or renovation activities.
7. **Reducing Construction Emissions:** Table 3B-7 on page 3B-13 of the DEIR shows that NO<sub>x</sub> construction emissions would exceed the significance thresholds if the construction of the proposed high school and the elementary school occur simultaneously as described under Scenario 2. To avoid significant adverse construction air quality

impacts, the SCAQMD recommends, to the extent practical and feasible, that the lead agency avoid overlapping construction schedules.

8. **Construction Mitigation Measures:** The lead agency states on page 3B-16 of the DEIR that no mitigation measures are available that would reduce NO<sub>x</sub> emissions to less than significant if the two schools are constructed simultaneously. SCAQMD staff disagrees with this characterization. The following are measures that could potentially reduce construction NO<sub>x</sub> emissions and they are recommended by SCAQMD staff for consideration by the lead agency:

- Use electricity from poles instead of temporary diesel- or gasoline-powered generators.
- Use alternative clean fuel such as compressed natural gas-powered construction equipment with oxidation catalysts instead of diesel-powered engines, or where diesel equipment has to be used, use particulate filters, oxidation catalysts, aqueous diesel fuel or low sulfur diesel, as defined in SCAQMD Rule 431.2, i.e., diesel with less than 15 ppm sulfur content.
- Require the use of newer, lower-emitting trucks to transport construction workers as well as equipment and material to and from construction site.
- Require trucks to be properly tuned and maintained.
- Prohibit all trucks from idling in excess of five minutes.
- Reroute truck routes to avoid residential areas or schools.