



South Coast Air Quality Management District

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

FAXED: JULY 15, 2005

July 15, 2005

Mr. Stan Yeh
Los Angeles Unified School District
Office of Environmental Health & Safety
355 South Grand Avenue, 15th Floor
Los Angeles, CA 90071

Dear Mr. Yeh

**Mitigated Negative Declaration (MND) for the
South Region Elementary School No. 1
(June 2005)**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The SCAQMD has identified a number of deficiencies in the air quality analysis that may warrant revising and recirculating the Draft MND. The SCAQMD requests that for all future school projects, the lead agency provide all the air quality technical support information and documents to facilitate review of the air quality impacts of the proposed projects.

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
LAC050616-03
Control Number

**Mitigated Negative Declaration (MND) for the
South Region Elementary School No. 1**

1. **Demolition Emissions:** According to the Construction Phase described on page 21 of the MND, there are several structures currently on the proposed project site. These structures, including single- and multi-family residential units, a vacant convalescent hospital and two churches, would have to be demolished before the site can be graded for construction to begin. Yet Table 3-1 shows no demolition emissions. Please provide the demolition emissions along with all the assumptions used to estimate the emissions. The analysis should include the volume of structures to be demolished, the type and number of equipment to be used, and emission factors, etc

2. **Construction Cut and Fill Operations:** The lead agency states on page 21 that the proposed school will include an underground parking garage. The lead agency, however, does not appear to quantify emissions from cut-and-fill operations necessary to construct this underground parking structure, including volume of soil removed, emissions from stockpiles, truck filling, storage pile emptying, and the number of trucks that would be needed to transport the soil to off-site destinations, etc. Fugitive dust emissions as well as combustion emissions from the heavy-duty diesel trucks that would be used to transport the soil from the project site would have to be estimated and shown in Table 3C-1.

3. **Construction PM10 Emissions:** Although Table 3-1 on page 33 of the MND shows daily construction emissions for the proposed project, the table only shows combustion emissions from construction equipment. For example, the table does not include fugitive dust (PM10) emissions from grading or other site preparation activities. The lead agency's explanation for this omission is that compliance with SCAQMD Rule 403 would ensure that fugitive dust emissions are less than significant. SCAQMD staff disagrees with this statement. Even though the construction contractors may comply with SCAQMD Rule 403, PM10 emissions are still being generated and should be quantified and disclosed to the public. It is recommended that the lead agency quantify the fugitive dust emissions, stating the assumptions relating to area graded, emission factors used, and the fugitive dust emissions and add the PM10 results to Table 3-1.

4. **Construction Workers Vehicle Emissions:** Table 3-1 on page 33 of the MND is also missing emissions from construction workers' on-road vehicle trips. Similarly, Appendix A shows emissions from delivery/haul on-road truck trips, but these emissions are not included in Table 3-1. Emissions from workers' vehicles presented in Appendix A should be included in Table 3-1 to fully reflect maximum daily construction emissions for the proposed project. Once emissions from all construction emissions sources are included in Table 3-1, total construction emissions should then be compared to the appropriate construction significance thresholds. If any pollutants exceed the applicable construction significance thresholds, then mitigation measures must be identified to reduce

- impacts to less than significant levels to continue to qualify for a negative declaration.
5. **VOC Emissions:** Table 3-1 shows VOC emissions from painting and asphalt operations during construction. Although assumptions are provided for calculating architectural coating emissions, similar assumptions are not provided for calculating asphalt emissions. Therefore, the SCAQMD is not able to confirm the VOC emissions from laying asphalt.
 6. **Operational Emissions:** On page 33 of the MND, the lead agency qualitatively dismisses operational emissions from the proposed project stating, "The new school projects under the program would cause a substantial reduction in traffic emissions, which are the dominant component of a school's operating emissions. First, the lead agency has provided no methodology or quantification to support this unsubstantiated assertion. Given that the traffic analysis shows a net increase of 436 vehicle trips per day, the lead agency's assertion does not appear to be supported by its own traffic analysis. Further, qualitatively dismissing operational emissions is not consistent with the approach taken in other MNDs prepared by the lead agency, see, for example, the DMND for the proposed Central Region Elementary School No. 15. The SCAQMD, therefore, requests that the lead agency quantify operational emissions.

The lead agency may use URBEMIS 2002 to estimate the proposed project's operational as well as construction emissions. The model may be accessed at the SCAQMD website: www.aqmd.gov/ceqa/models.html. If quantification of emissions reveals that project emissions exceed the established significance thresholds, then mitigation measures must be required by the lead agency to reduce those emissions to less than significance.

7. **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 toxic sites within ¼-mile of proposed schools. On page 49 of the MND the lead agency notes that there were 17 auto repair and food businesses located within ¼-mile from the school that had the potential to emit hazardous gases. The lead agency does not list these facilities or show their location in relation to the proposed school. The SCAQMD data base of SCAQMD's stationary source-permitted facilities within ¼-mile of the proposed schools lists ten such facilities within ¼-mile from the school. However, since the lead agency did not identify the facilities emitting air toxics, the SCAQMD cannot confirm whether the lead agency's list includes the facilities identified by the SCAQMD. The map and list of these permitted facilities are attached. SCAQMD staff recommends that the lead agency compare the two lists and identify all the relevant facilities in the Final MND.