



South Coast
Air Quality Management District

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

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Ms. Grace Esteves, CEQA Project Manager
Los Angeles Unified School District
Office of Environmental Health and Safety
1055 West Seventh Street, 9th Floor
Los Angeles, CA 90017

**Draft Environmental Impact Report (Draft EIR) for the Proposed Central Region
MacArthur Park Elementary School Addition Project**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The SCAQMD would also like to thank the lead agency for the additional time to submit comments. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final Environmental Impact Report.

Pursuant to Public Resources Code Section 21092.5, please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. The SCAQMD staff would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

Steve Smith
Program Supervisor – CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS:GM

LAC080716-02
Control Number

Air Quality Analysis

1. Table 3A-5 on page 3A-16 of the Draft EIR and Table 5 on page A-17 of Appendix A shows that unmitigated construction PM10 and PM2.5 emissions would exceed the SCAQMD's applicable recommended LSTs for each pollutant. Footnote b states that compliance with SCQMD Rule 403 – Fugitive Dust would bring the PM10 and PM2.5 emissions below the threshold, although no documentation is provided in the text to support this assertion.

Review of Table 8 on page A-20 of Appendix A shows mitigated construction emissions from the URBEMIS2007 model output files in Attachment A1. Mitigated PM10 and PM2.5 emissions still exceed the applicable LSTs for these pollutants. The lead agency states that implementing best available control measures from Rule 403 will reduce impacts to less than significance. First, URBEMIS2007 mitigation generally complies with Rule 403 requirements, so it appears that the lead agency is double counting emission reductions. Further, if the lead agency's intent is to use Rule 403 measures to go beyond the mitigation measures in the URBEMIS2007 model, it has not quantified the effectiveness of the Rule 403 measures and, therefore, has not demonstrated that PM10 and PM2.5 emissions from the proposed project are less than significant.

Construction Mitigation Measures

2. On page 3A-16, the lead agency states that no mitigation measures are required even though the estimated construction PM10 (fugitive dust) and PM2.5 emissions exceed the daily localized significance threshold for PM10 (fugitive dust) and PM 2.5 (see page 3A-17 [Table 3A]. However, the URBEMIS2007 output files in Attachment A-1 and section 3.1.8 on page A-19 in Appendix A clearly show that mitigation measures have been identified and used to reduce construction emission impacts. The SCAQMD recommends that the statements that no mitigation measures are required be deleted in the Final EIR. Further, it is also recommended that the discussion in section 3.1.8 of Appendix A be moved to the construction section of the Draft EIR.
3. Should the lead agency conclude that construction PM10 and PM2.5 emissions are significant, additional mitigation measures for consideration by the lead agency, if applicable and feasible, can be found at http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html to further reduce PM10 fugitive dust localized impacts from the project.
4. As indicated in comment #2, the lead agency relies on mitigation measures to reduce construction air quality impacts. The SCAQMD recommends that the lead agency modify the following mitigation measure on page A-19:

Recommended change:

The following changes are recommended for Mitigation Measure 3.1.8 to reduce fugitive dust:

1. MM1: General contractors shall implement a fugitive dust control program pursuant to the provisions of SCAQMD Rule 403 with additional watering at least twice daily (state the number of times water will be applied each day)