



South Coast  
Air Quality Management District

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**FAXED: JANUARY 25, 2008**

January 25, 2008

Ms. Hoan Tang  
Los Angeles Unified School District  
Office of Environmental Health and Safety  
1055 West 7<sup>th</sup> Street, 9<sup>th</sup> Floor  
Los Angeles, CA 90017

Dear Ms. Tang:

**Draft Environmental Impact Report (DEIR) for South Region  
Elementary School No. 5  
(Huntington Park)**

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 SCAQMD would be available 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

Susan Nakamura  
Planning Manager  
Planning, Rule Development & Area Sources

Attachment

SN:JK:CB  
LAC071218-17  
Control Number

**Draft Environmental Impact Report (DEIR) for  
South Region Elementary School No. 5**

**1. Health Risk Assessment (HRA):**

The HRA was not attached to the DEIR. It was part of the Initial Study and needs to be attached to the DEIR or properly referenced in the DEIR.

An exposure duration of seven years was used for student exposure. SCAQMD staff recommends that LAUSD use OEHHA guidance for HRA parameters in the Final EIR.

**2. URBEMIS 2002 and 2007:**

The lead agency used URBEMIS 2002 and EMFAC 2002 emission factors for the analysis of the air quality impacts of the proposed project including the truck emissions. The lead agency should be aware that URBEMIS 2007 is now available and it is recommended that the model be used to assess the air quality analysis for future projects instead of URBEMIS 2002. The advantages to using the URBEMIS 2007 model are that the model uses EMFAC 2007 on-road emissions factors, the OFFROAD 2007 emission factors for off-road equipment, and also calculates PM 2.5 and CO<sub>2</sub> emissions. URBEMIS 2007 can be accessed at the following website: [www.urbemis.com](http://www.urbemis.com).

The URBEMIS 2002 model printout in Appendix B shows inconsistencies in the total site acreage, maximum acreage disturbed per day as well as the square footage of the proposed project. In one printout the data shows zero acres for both total acreage and maximum daily acreage disturbed as well as the square footage of the proposed project. In another printout the data shows 5.1 acres as total site and 2.5 acres as the daily maximum acreage disturbed. In the second printout the correct amount of 70,000 square footage is used. The project description shows total site as approximately 5.3 acres. Please use correct acreage to reflect actual project emissions in the Final EIR.

**3. Project Mitigation:**

Should the recalculation of the proposed project's air quality impacts identify pollutants that exceed the applicable significance thresholds recommended by the SCAQMD, the SCAQMD requests that the lead agency quantify the effectiveness of mitigation measures identified for the proposed project. Control efficiencies for a variety of mitigation measures can be found in Chapter 11 of the SCAQMD's CEQA Air Quality Handbook. Additional information can be found on the SCAQMD's CEQA webpages at: [www.aqmd.gov/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/handbook/mitigation/MM_intro.html).