



South Coast
Air Quality Management District

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November 13, 2009

Mr. Larry Eisenberg, Executive Director
Facilities Planning and Development
Los Angeles Community College District
770 Wilshire Boulevard, 6th Floor
Los Angeles, CA 90017

Draft Environmental Impact Report (Draft EIR) for the Proposed South Gate Educational Center (SGEC)

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 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,

A handwritten signature in black ink that reads "Susan Nakamura".

Susan Nakamura
Planning Manager
Planning, Rule Development & Area Sources

Attachment

SN:EE:GM

LAC091001-05
Control Number

Project Description

1. In the project description in Table 3-3: Conceptual Program for Buildings 1 and 3 and in the Site Plan (Figure 3-2), the lead agency describes a Children's Center Playground but little or no information is included about the scope of the activity, i.e., a description of the daycare center, days and hours of operation, the number of children and staff, location of the playground, etc. This information should be included in the Final EIR.
2. In addition, the project description describes 4,056 current adult and high school students at the current site but does not give a current figure for staff. The projected assumption for growth at the proposed site is 12,000 adult and high school students but the number of current and projected staff is not included in the Draft EIR. These baseline and future growth figures help in the review of the operational student, educational and administrative staff vehicle trip air quality regional impact estimates, and therefore, should be included in the Final EIR.

Potential Export and Disposal of Contaminated Soils

3. Under Hazards and Hazardous Materials in Section 4.5 on page 4.5-2, the lead agency describes groundwater samples from the western project site that detected volatile organic compounds (VOCs). In the Final EIR, the lead agency should describe how the proposed project will comply with SCAQMD Rule 1166 - Volatile Organic Compound Emissions from Decontamination of Soil. In addition, the air quality impacts from off- and on-road equipment removing contaminated soil and importing soil should be estimated and included in the Final EIR.

Construction Mitigation Measures

4. Because the localized construction emission impacts for PM10 and PM2.5 for the project were concluded to be significant, the lead agency should consider the following change and adding the following mitigation measures to further reduce fugitive dust (PM10 and PM2.5) impacts from the proposed project, if applicable and feasible:

Recommended Change:

AQ4 Construction activity on unpaved surfaces shall be suspended when wind speeds (as instantaneous gusts) exceed 25 mph;

Recommended Additions:

- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation;
- Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more);

- Water active sites at least twice daily;
- All trucks hauling dirt, sand, soil, or other loose materials are to be covered;
- Traffic speeds on all unpaved roads to be reduced to 15 mph or less; and
- Sweep streets at the end of the day if visible soil is carried onto adjacent public paved roads (recommend water sweepers with reclaimed water).

Operation Mitigation Measures

5. Because the project-specific operational air quality impacts from the proposed project are estimated to exceed the recommended SCAQMD daily significance thresholds for oxides of nitrogen (NO_x) and volatile organic compounds (VOC) and the lead agency proposes to lease the western project site for uses that will include truck idling and queuing, contributing to significant adverse cumulative air quality impacts, the SCAQMD staff recommends that the lead agency consider the following mitigation measures for future tenants in the Western Project Site, a proposed continuation of the current manufacturing and warehouse use. In addition to the measures proposed on page 4.2-26 in the Air Quality Section of the Draft EIR, the following recommendations can be enforced as a condition of lease to reduce the exposure to students and children at the project site from diesel particulate emissions from truck activity, if applicable and feasible:

Recommended Additions:

- Re-route truck traffic by restricting truck traffic on certain sensitive routes. Specifically, trucks should preferably not enter or exit in front of the eastern project site Buildings 1 or 3 on Firestone Boulevard.
- Prohibit vehicles from idling in excess of five minutes, both on- and off-site;
- Use street sweepers that comply with SCAQMD Rules 1186 and 1186.1;
- Alternative fueled off-road equipment; and
- Require the manufacturing/warehouse facility to operate the cleanest vehicles available.