



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL AND USPS:

May 29, 2018

CEQA-comments@lausd.net

Eimon Smith, CEQA Project Manager
Los Angeles Unified School District
Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor
Los Angeles, CA 90017

Mitigated Negative Declaration (MND) for the Proposed Thomas Jefferson High School Comprehensive Modernization Project

The South Coast Air Quality Management District (SCAQMD) staff 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 MND.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to demolish a number of existing buildings totaling 116,000 square and build 110,000 square feet of new buildings in addition to other improvements on 18.9 acres (Proposed Project). Construction is expected to take 5.5 years¹.

SCAQMD Comments

One of the Air Quality Standard Conditions of Approval for the Proposed Project is to require, among others, “use construction equipment rated by the United States Environmental Protection Agency as having Tier 3 (model year 2006 or newer) or Tier 4 (model year 2008 or newer) emission limits for engines between 50 and 750 horsepower²” (SC-AQ-4). This means that construction equipment rated between 50 and 750 horsepower will be required to meet *either* Tier 3 *or* Tier 4 emission standards (*Emphasis added*). However, in other parts of the MND (e.g., Pages 54, 56, and 62), the Lead Agency stated that off-road construction equipment will be compliant with Tier 4 engine standards (not either Tier 3 or Tier 4 engines). Additionally, Tier 4 construction equipment was used in CalEEMod (version 2016.3.2) to quantify the Proposed Project’s construction emissions and DPM emissions³. To ensure consistency with the requirements under SC-AQ-4, which, as it is currently written, allows the use of Tier 3 engines, and to analyze a worst-case construction impact scenario, it is recommended that the Lead Agency revise the air quality analysis by modeling emissions from construction equipment with Tier 3 engines. Alternatively, SCAQMD staff recommends that the Lead Agency go beyond the SC-AQ-4 standard by requiring Tier 4 engines only.

Closing

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, response should provide sufficient details giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual

¹ MND. Page 26.

² MND. Page 52.

³ MND. Appendix A, *Air Quality Emissions Calculation Worksheets*, to Appendix A: *Air Quality Technical Report*. PDF Page 74 of 2379.

information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful or useful to decision makers and the public who are interested in the Proposed Project.

SCAQMD staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact me at lsun@aqmd.gov if you have any questions regarding the enclosed comments.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS

LAC180508-05

Control Number