



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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CEQA-comments@lausd.net

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**Negative Declaration (ND) for the Proposed
Alexander Hamilton High School Comprehensive Modernization Project
(Proposed Project) (SCH No.: 2020100269)**

South Coast Air Quality Management District (South Coast AQMD) 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 ND.

South Coast AQMD Staff's Summary of Project Description in the ND

The Lead Agency proposes to demolish 126,878 square feet of existing structures, modernize two buildings totaling 84,745 square feet, and build five new school facilities totaling 149,173 square feet on 27.7 acres. (Proposed Project). The Proposed Project is located on the southwest corner of South Robertson Boulevard and Cattaraugus Avenue in the City of Los Angeles (City). Based on a review of Figure 1, *Regional Location Map*, and Figure 5, *Proposed Project Site Plan*, in the ND, South Coast AQMD staff found that one of the new school facilities will be located within 500 feet of Interstate 10 (I-10). Construction of the Proposed Project is expected to take six years and three months¹. According to the ND, the Proposed Project contains soil contaminated with lead and arsenic that will need to be removed in accordance with the Removal Action Workplan that will be prepared for the Proposed Project².

South Coast AQMD Staff's Summary of the Air Quality Analysis in the ND

According to the ND, the Lead Agency includes five air quality standard conditions for the Proposed Project. One of the standard conditions is to require construction equipment as having at least Tier 3 (model year 2006 or newer) or Tier 4 (model year 2008 or newer) emission limits for engines between 50 and 750 horsepower³. In the CalEEMod Air Quality Emission Output Files, the Lead Agency assumed the use of Tier 4 Final construction equipment to calculate the Proposed Project's regional construction emissions⁴. The Proposed Project's daily maximum regional construction NOx emissions would be 89 pounds per day (lbs/day)⁵.

¹ ND. Page 27.

² *Ibid.* Page 73.

³ *Ibid.* Page 40.

⁴ *Ibid.* Appendices. PDF pages 66 and 67.

⁵ *Ibid.* Page 43.

South Coast AQMD Staff's Comments*CEQA Air Quality Impact Analysis for Regional Construction Impacts*

The Lead Agency used a default one-way truck trip length of 20 miles to quantify the Proposed Project's construction emissions from hauling construction materials and importing or exporting soil. In the Utilities and Service System Section of the ND, the Lead Agency stated that nonhazardous solid waste will be disposed of within three of the landfills within the City⁶. Since the Proposed Project contains soil contaminated with lead and arsenic that will need to be removed⁷, and depending on the type of contamination, contaminated soil may not be accepted at any of the landfills within the City and may need to be disposed at a permitted hazardous disposal facility outside the City or the Los Angeles County with a one-way trip length that is likely longer than 20 miles. Using a one-way truck trip length of 20 miles likely underestimated the Proposed Project's construction emissions, particularly from NOx. Therefore, South Coast AQMD staff recommends that the Lead Agency identify the permitted hazardous disposal facility that the Proposed Project will use to dispose contaminated soil, disclose it in the Final ND, and re-calculate the Proposed Project's construction emissions from haul truck trips based on the appropriate one-way trip length.

Air Quality Standard Condition for Construction Equipment

In the ND, the Lead Agency is committed to using construction equipment as having at least Tier 3 (model year 2006 or newer) or Tier 4 (model year 2008 or newer) emission limits for engines between 50 and 750 horsepower⁸. This means that some construction equipment at the Proposed Project is Tier 3 and some is Tier 4. However, based on a review of the CalEEMod Air Quality Emission Output Files for the Proposed Project, South Coast AQMD staff found that the Lead Agency calculated the Proposed Project's construction emissions based on an assumption that all construction equipment at the Proposed Project is Tier 4 Final. It is not appropriate to rely on emissions reductions from Tier 4 Final construction equipment to calculate the Proposed Project's construction emissions when the Proposed Project can use either Tier 3 or Tier 4 construction equipment. Therefore, South Coast AQMD staff recommends that the Lead Agency revise and strengthen the air quality standard condition for construction equipment in the Final ND to require the use of Tier 4 Final construction equipment. Alternatively, if the Lead Agency does not revise the air quality standard condition for construction equipment in the Final ND, the Lead Agency should re-calculate the Proposed Project's construction emissions based on the use of Tier 3 construction equipment to determine the level of significance for the Proposed Project's construction air quality impacts.

Health Risk Reduction Strategies

The Proposed Project is located within 500 feet of I-10. Sensitive receptors at the Proposed Project will be exposed to diesel particulate matter emissions from mobile sources traveling on I-10 (e.g., diesel fueled, heavy-duty trucks). Many strategies are available to reduce exposures, including, but are not limited to, building filtration systems with MERV 13 or better, or in some cases, MERV 15

⁶ *Ibid.* Page 114.

⁷ *Ibid.* Page 73.

⁸ *Ibid.* Page 40.

or better is recommended; building design, orientation, location; vegetation barriers or landscaping screening, etc. Enhanced filtration units are capable of reducing exposures. However, enhanced filtration systems have limitations. For example, in a study that South Coast AQMD conducted to investigate filters⁹, a cost burden is expected to be within the range of \$120 to \$240 per year to replace each filter panel. The initial start-up cost could substantially increase if an HVAC system needs to be installed and if standalone filter units are required. Installation costs may vary and include costs for conducting site assessments and obtaining permits and approvals before filters can be installed. Other costs may include filter life monitoring, annual maintenance, and training for conducting maintenance and reporting. In addition, because the filters would not have any effectiveness unless the HVAC system is running, there may be increased energy consumptions that the Lead Agency should evaluate in the Final ND. It is typically assumed that the filters operate 100 percent of the time while residents are indoors, and the environmental analysis does not generally account for the times when the residents have their windows or doors open or are in common space areas of the project. These filters have no ability to filter out any toxic gases. Furthermore, when used filters are replaced, replacement has the potential to result in emissions from the transportation of used filters at disposal sites and generate solid waste that the Lead Agency should evaluate in the Final ND. Therefore, the presumed effectiveness and feasibility of any filtration units should be carefully evaluated in more detail prior to assuming that they will sufficiently alleviate exposures to diesel particulate matter emissions.

Conclusion

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the ND for adoption together with any comments received during the public review process. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final ND. When responding to issues raised in the comments, responses 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 information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and the public who are interested in the Proposed Project.

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. If you have any questions or wish to discuss the comments, please contact me at lsun@aqmd.gov.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

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Control Number

⁹ This study evaluated filters rated MERV 13 or better. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf>. Also see 2012 Peer Review Journal article by South Coast AQMD: <https://onlinelibrary.wiley.com/doi/10.1111/ina.12013>.