



South Coast
Air Quality Management District

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January 24, 2008

Mr. Eric Scherer
Community Development Department
City of La Verne
3660 "D" Street
La Verne, CA 91750-3599

**Draft Mitigated Negative Declaration for the Proposed Lutheran High School of La Verne
Remodel & Expansion (Case Nos. 29-07 CUP, 30-07 VAR, and 32-07 PPR)**

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 Mitigated Negative Declaration.

The SCAQMD would welcome any written responses to all comments contained herein prior to the adoption of the Final Mitigated Negative Declaration. 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, Ph. D.
Program Supervisor, CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS:GM

LAC071108-04
Control Number

Air Quality Analysis

1. In the Draft Mitigated Negative Declaration (Draft MND), the estimated project emissions in Table 1 (Comparison of Project Emissions) on page 11 is not consistent with the estimated emissions shown in the URBEMIS 2002 Version 8.7.0. The URBEMIS output sheets indicate that construction emissions for oxides of nitrogen (NO_x) exceed the SCAQMD daily significance threshold of 100 pounds per day, while the air quality analysis in the environmental checklist provides a different and much lower NO_x emissions value. In the Final MND, the lead agency should correct or explain this apparent discrepancy.
2. Should the lead agency conclude after its analyses that construction air quality impacts exceed the SCAQMD daily significance thresholds, SCAQMD staff has compiled mitigation measures to be implemented if the air quality impacts are determined to be significant. The SCAQMD recommends that the lead agency consider implementing mitigation measures for construction to reduce applicable construction-related oxides of nitrogen NO_x and PM10 (fugitive dust) emissions related with the proposed project, if applicable and feasible. Mitigation measure suggestions can be found at http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html .
3. In the Air Quality Analysis, the lead agency estimated operational air quality impacts using the URBEMIS 2002 version 8.7.0 computer model. The lead agency should be aware that the URBEMIS model has been upgraded to URBEMIS 2007, which was released in September 2007. So, for future projects, the SCAQMD recommends that URBEMIS2007 be used. URBEMIS 2007 version 9.2.2 can be accessed at <http://www.aqmd.gov/ceqa/models.html> or the lead agency can follow the calculation methodologies in Chapter 9 and the Appendix to Chapter 9 in the SCAQMD's CEQA Air Quality Handbook.
4. It is not clear from the URBEMIS 2002 output sheets or in the narration how the lead agency estimated soil disturbance emissions from any grading or the excavation of the subterranean courts option. The lead agency should correct or explain these apparent discrepancies in the Final MND.

Localized Significance Thresholds

5. Because the proposed project activities will expose existing students, faculty, and administrative staff to emissions from the proposed project activities and that the site is located less than a quarter-mile from residences north, east and west of the current site, a localized air quality analysis may be warranted to ensure that the students, faculty and administrative staff at the existing school site are not adversely affected by the demolition and other soil disturbance activities that are occurring in close proximity. SCAQMD guidance for performing a localized air quality analysis can be found at the following web address: <http://www.aqmd.gov/ceqa/handbook/LST/LST.html> .

PM2.5 Significance Thresholds

6. In response to adoption of PM2.5 ambient air quality standards by U.S. EPA and CARB, SCAQMD staff has developed a methodology for calculating PM2.5 emissions when preparing air quality analyses for California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) documents. To determine if PM2.5 air quality impacts are significant, SCAQMD staff has also developed recommended regional and localized PM2.5 significance thresholds. When preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a PM2.5 significance analysis by following the guidance found at http://www.aqmd.gov/ceqa/handbook/PM2_5/PM2_5.html Further, SCAQMD staff has compiled mitigation measures to be implemented if the PM2.5 impacts are determined to be significant. Mitigation measure suggestions can be found at http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html