



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:
Marianne.King@lacity.org

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Ms. Marianne King, Planning Assistant
City of Los Angeles, City Hall
Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012

**Draft Initial Study/Mitigated Negative Declaration (DMND) for the Proposed
Construction of a Two-Story Elementary School Building Project Located at 5461
N. Louise Avenue in Encino, City of Los Angeles
(MND-NG-14-406-PL; ENV-2014-2695)**

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 CEQA document.

Based on the project description, the Lead Agency will demolish five buildings totaling 12,312 square feet, remove six trees and relocate approximately 57 trees at the existing Westmark private elementary school site. Construction would occur totaling approximately 74,790 square feet of building space. The buildings will include a two-story 13,580 square foot elementary school building and a two-story 300-seat gymnasium/multi-purpose building with a basement. Excavation would include soil export estimated to be about 1,200 cubic yards. The soil export disposal site, distance traveled and the number of haul trips were not included in the DMND. Phasing information including the project's estimated construction start and completion dates should also be included in the Final MND. The demolition, tree removal/relocation and construction will occur in the southwest portion of the project site.

On page 12 in the Air Quality Section, the lead agency determined that project air quality impacts would be potentially significant to nearby residences during construction activities but did not quantify project air quality impacts for either short- or long-term activities. Without quantifying project air quality impacts, the lead agency has not demonstrated that the proposed project will not generate significant adverse construction or operational air quality impacts that may trigger further analysis pursuant to the California Environmental Quality Act. Therefore, the SCAQMD staff recommends that the lead agency demonstrate that project impacts are less than significant in the Final MND by estimating short- and long-term air quality impacts using the current California

Emission Estimator Model (CalEEMod).¹ CalEEMod is a statewide land use emissions model that can quantify potential project criteria pollutant and greenhouse (GHG) emissions. The lead agency can also estimate project emissions by following the calculation methodologies in Chapter 9 and the Appendix to Chapter 9 in the South Coast SCAQMD's CEQA Air Quality Handbook.² Should the lead agency conclude after its analyses that construction or operational air quality impacts exceed the SCAQMD daily significance thresholds, staff has compiled mitigation measures³ in addition to the mitigation included in the DMND starting on page two of the DMND to be implemented if the air quality impacts are determined to be significant.

It is also recommended that the lead agency evaluate localized air quality impacts since it is noted on page seven of the DMND and in an aerial map inspection, the proposed project is located within one-quarter mile of sensitive receptors (single-family residences) south, east and west of the project site. Therefore, the SCAQMD staff requests that the lead agency evaluate localized air quality impacts to ensure that any nearby sensitive receptors are not adversely affected by the construction activities that are occurring in close proximity. SCAQMD guidance for performing a localized air quality analysis can also be found at the SCAQMD website.⁴

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. The SCAQMD staff is available 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,

Jillian Baker

Jillian Baker, Ph.D.
Program Supervisor
Planning, Rule Development & Area Sources

JB:GM

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¹ <http://www.aqmd.gov/ceqa/models.html>

² <http://www.aqmd.gov/ceqa/hdbk.html>

³ http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html

⁴ <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>