



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:

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CEQA-comments@lausd.net

William Meade, Environmental Planning Specialist
Los Angeles Unified School District
Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor
Los Angeles, CA 90017

Draft Environmental Impact Report (EIR) for the Proposed San Pedro 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 comment is meant as guidance for the Lead Agency and should be incorporated into the Final EIR.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to renovate, modernize, and build new buildings and facilities at San Pedro High School (Proposed Project). Four structures totaling approximately 34,682 square feet are expected to be demolished, and four new buildings totaling approximately 19,700 square feet are expected to be built on 22.9 acres. As part of the Proposed Project, a Removal Action Workplan (RAW) has been prepared to remove approximately 226 cubic yards of contaminated soil with arsenic, lead, and organochlorine pesticide¹. Contaminated soil will be transported to Buttonwillow, California², which is approximately 150 miles north of the Proposed Project. Construction of the Proposed Project is expected to take approximately three to four years in three phases³.

SCAQMD Staff's Comments

Air Quality Analysis – Construction Emissions

In the Air Quality Analysis, the Lead Agency quantified the Proposed Project's construction emissions for each of the three construction phases and overlapping construction phases, and compared the emissions to SCAQMD air quality CEQA significance thresholds to determine the level of significance. The Lead Agency found that the Proposed Project's construction air quality impacts would be less than significant after incorporating air quality standard conditions of approvals (SC-AQ-1 through SC-AQ-5),

Based on a review of Appendix B to the Draft EIR, SCAQMD staff found that the Lead Agency quantified the emissions for transporting contaminated soil to Buttonwillow, California. However, it was not clear to SCAQMD staff if the soil removal haul truck emissions for the traveling portion within the SCAQMD boundaries were included in calculating the Proposed Project's construction emissions⁴ to determine the level of significance. As such, SCAQMD staff recommends that the Lead Agency provide additional clarifying information in the Final EIR.

¹ Draft EIR. Page 2-18.

² *Ibid.*

³ *Ibid.*

⁴ Draft EIR. Table 3.1-5. Pages 3.1-25 and 26.

Tier 4 Construction Equipment or Better

One of the air quality standard conditions of approvals (SC-AQ-4) is to “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 horsepower”⁵.

To further reduce exhaust emissions, particularly from NO_x and particulate matters, SCAQMD staff recommends that the Lead Agency requires all off-road diesel-powered construction equipment to meet or exceed the CARB and USEPA *Tier 4* off-road emissions standards for equipment rated at 50 horsepower or greater during Project construction. Such equipment will be outfitted with Best Available Control Technology (BACT) devices including a CARB certified Level 3 Diesel Particulate Filters (DPF). Level 3 DPFs are capable of achieving at least 85 percent reduction in in particulate matter emissions⁶. A list of CARB verified DPFs are available on the CARB website⁷. To ensure that Tier 4 construction equipment or better will be used during the Project construction, SCAQMD staff recommends that the Lead Agency include this requirement in applicable bid documents. Successful contractor(s) must demonstrate the ability to supply the compliant construction equipment for use prior to any ground disturbing and construction activities. A copy of each unit’s certified tier specification or model year specification and CARB or SCAQMD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment. Additionally, the Lead Agency should require periodic reporting and provision of written documentation by contractors to ensure compliance, and conduct regular inspections to the maximum extent feasible to ensure compliance.

Diesel Haul Trucks of Model Year 2010 or Newer

Since the Lead Agency will use haul trucks to remove, transport, and dispose approximately 226 cubic yards of contaminated soil to Buttonwillow, California, and to further reduce NO_x emissions from mobile sources, it is recommended that the Lead Agency require the use of 2010 model year diesel haul trucks that conform to 2010 U.S. EPA truck standards or newer diesel haul trucks (e.g., material delivery trucks and soil import/export) during Construction Phase 1A (Soil Removal). If the Lead Agency determines that 2010 model year or newer diesel haul trucks are not feasible, the Lead Agency shall use trucks that meet EPA 2007 model year NO_x emissions requirements, at a minimum. It is recommended that the Lead Agency include this requirement in applicable bid documents. Successful contractor(s) must demonstrate the ability to supply the compliant diesel haul trucks for use prior to any construction activities in Phase 1A. Additionally, the Lead Agency should require periodic reporting and provision of written documentation by contractors, and conduct regular inspections to the maximum extent feasible to ensure compliance.

Closing

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), SCAQMD staff requests that the Lead Agency provide SCAQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail 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 will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful or useful to decision makers and to the public who are interested in the Proposed Project.

SCAQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact me at lsun@aqmd.gov if you have any questions.

⁵ Draft EIR. Page 3.1-15.

⁶ California Air Resources Board. November 16-17, 2004. *Diesel Off-Road Equipment Measure – Workshop*. Page 17. Accessed at: https://www.arb.ca.gov/msprog/ordiesel/presentations/nov16-04_workshop.pdf

⁷ *Ibid*. Page 18.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

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