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**Mitigated Negative Declaration (MND) for the Proposed ENV-2018-7112: 17081 West Devonshire Street Project**

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 MND.

South Coast AQMD Staff's Summary of Project Description

The Lead Agency proposes the phased redevelopment of an existing school, including demolition of 34,659 square feet of existing structures and construction of four new buildings totaling 92,692 square feet on seven acres (Proposed Project). Phase 1 of the Proposed Project includes construction of a three-story classroom building; Phase 2 includes demolition of existing on-site structures and construction of a multi-purpose building and locker rooms; and Phase 3 includes construction of the sports field[1]. The Proposed Project would also increase the student capacity by 1,165 students with a maximum capacity of 1,925 students[2]. The Proposed Project is located at 17081 West Devonshire Street on the northeast corner of Amestoy Avenue and West Devonshire Street in the community of Granada Hills-Knollwood. The Proposed Project would be constructed in three phases over 25 months[3] and become operational in July 2021[4].

South Coast AQMD Staff's Summary of Air Quality Analysis

In the Air Quality Analysis section, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared those emissions to South Coast AQMD's recommended regional and localized air quality CEQA significance thresholds. Based on the analysis, the Lead Agency found that the Proposed Project's regional and localized construction and operational air quality impacts would be less than significant without the implementation of any mitigation measures[5].

South Coast AQMD Staff's General Comments

South Coast AQMD staff has comments on the Air Quality Analysis. The Proposed Project could potentially have an overlapping construction and operational scenario (e.g., Phase 1 could become operational while phase 2 and 3 are under construction). It did not appear that the Lead Agency included this scenario in the analysis. Additionally, the Lead Agency compared localized construction emissions to South Coast AQMD's localized significance thresholds (LSTs) for a five-acre project with sensitive receptors at 25 meters in Source Receptor Area (SRA) 7. To conservatively analyze the worst-case

[1] MND. Appendix B, *Air Quality Technical Report.* Page 9.
[2] MND. Page 12.
[3] *Ibid*. Appendix B, *Air Quality Technical Report.* Page 9.
[4] The Air Quality Technical Report states the project would be constructed over 25 months and be completed by July 2021 and modeled emissions accordingly. However, the MND makes reference to full buildout occurring in 2023. The Lead Agency should clarify this.
[5] MND. Page 28.

localized impact scenario and avoid underestimating the Proposed Project's localized construction emissions, more stringent LSTs in the South Coast AQMD's LSTs Mass Look-Up Table are recommended. Please see the attachment for more information. The attachment also includes a list of potential mitigation measures as resources to further reduce the Proposed Project's construction and operational emissions that the Lead Agency should consider and incorporate in the Final MND.

Conclusion

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 South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. 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. Further, if the Lead Agency makes a finding that additional recommended mitigation measures are not feasible, the Lead Agency should describe the specific reasons for rejecting or substituting these mitigation measures in the Final MND (CEQA Guidelines Section 15074.1).

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. Please contact Robert Dalbeck, Assistant Air Quality Specialist, at RDalbeck@aqmd.gov or (909) 396-2139, should you have any questions.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.
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Attachment
LS:RD
LAC190515-06
Control Number

**ATTACHMENT**

**Air Quality Analysis - Overlapping Construction and Operation Scenario**

1. The Proposed Project would be completed in three phases. While the Lead Agency modeled emissions in CalEEMod for each phase, it did not analyze a scenario in which the Proposed Project's construction and operational activities overlap. Based on the CalEEMod output files, construction of Phase 1 (new classroom building) would begin in June 2019 to be completed in July 2020. Construction of Phase 2 would begin in July 2020 and reach completion in May 2021. Construction of Phase 3 would begin in October 2020 and reach completion in April 2021. As such, operation of the new classrooms from Phase 1 would overlap with construction activities of Phases 2 and 3. Therefore, to analyze a worst-case impact scenario, South Coast AQMD staff recommends that the Lead Agency use its best efforts to identify the overlapping years among the three phases, combine construction emissions (including emissions from demolition) with operational emissions, and compare the combined emissions to South Coast AQMD's air quality CEQA *operational* thresholds of significance to determine the level of significance for air quality in the Final MND, unless the Lead Agency includes requirements and/or conditions in applicable bid documents and/or development agreements to expressly prohibit overlapping construction and operational activities (*emphasis added*). If the Lead Agency finds, after analyzing an overlapping construction and operation scenario, that the Proposed Project's air quality impacts would be significant, mitigation measures will be required (CEQA Guidelines Section 15126.4).

**Air Quality Analysis - Localized Significance Thresholds (LSTs)**

2. The Lead Agency used the LSTs for a five-acre project in Source Receptor Area (SRA) 7 based on a sensitive receptor distance of 25 meters to determine the level of significance for the Proposed Project's localized construction air quality impacts. South Coast AQMD staff is concerned with the LSTs methodology based on a five-acre project. Based on a review of the CalEEMod modeling output files, South Coast AQMD staff found that five acres of grading would be required for Phase 1; no grading would be expected for Phase 2; and 2.5 acres of grading would be required for Phase 3. To conservatively analyze a worst-case localized construction impact scenario and avoid underestimating the Proposed Project's localized construction emissions, more stringent LSTs in the South Coast AQMD's LSTs Mass Look-Up Table should be used to determine the level of significance. Therefore, South Coast AQMD staff recommends that the Lead Agency compare the Proposed Project's localized construction emissions to South Coast AQMD's LSTs for a two-acre project with sensitive receptors at 25 meters in SRA 7. As highlighted in Table 1, when the Proposed Project's localized construction emissions are compared to South Coast AQMD air quality CEQA LSTs for a two-acre project in SRA 7, localized PM10 and PM2.5 emissions would be significant and adverse, thereby requiring the consideration of mitigation measures pursuant to CEQA Guidelines Section 15126.4.

**Table 1: South Coast AQMD's Air Quality CEQA Local Significance Thresholds**

| Acreage | NOx (lbs/day) | CO (lbs/day) | PM10 (lbs/day) | PM2.5 (lbs/day) |
|---|---|---|---|---|
| 1 Acre | 80 | 498 | 4 | 3 |
| **2 Acre** | **114** | **786** | **7** | **4** |
| 5 Acre | 172 | 1,434 | 14 | 8 |
| ***Proposed Project's Emissions*** | ***45.57*** | ***33.64*** | ***13.16*** | ***7.62*** |
| ***Exceed South Coast AQMD's Air Quality CEQA LSTs?*** | ***No*** | ***No*** | ***Yes*** | ***Yes*** |

*Note: The above table shows LSTs for a project site located in SRA 7 with sensitive receptors at 25 meters.*
*Source: South Coast AQMD Staff. May 31 2019.*

**Recommended Mitigation Measures**

3. To reduce the Proposed Project's localized construction emissions, particularly from PM10 and PM2.5, South Coast AQMD recommends that the Lead Agency incorporate the following mitigation measures in the Final MND.

   a. Require construction contractor(s) to use off-road diesel-powered construction equipment that meets or exceeds the California Air Resources Board (CARB) and U.S. Environmental Protection Agency (U.S. EPA) Tier 4 off-road emissions standards for equipment rated at 50 horsepower or greater during construction. Such equipment should be outfitted with Best Available Control Technology (BACT) devices including, but not limited to, a CARB certified Level 3 Diesel Particulate Filters (DPF). Level 3 DPFs are capable of achieving at least an 85 percent reduction in particulate matter emissions. A list of CARB verified DPFs are available on the CARB website. Additionally, the Lead Agency should include this requirement in applicable bid documents, and that successful contractor(s) must demonstrate the ability to supply compliant equipment prior to the commencement of any construction activities. A copy of each unit's certified tier specification and CARB or South Coast AQMD operating permit (if applicable) should 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 with this mitigation measure. If the Lead Agency finds that Tier 4 construction equipment is not feasible pursuant to CEQA Guidelines Section 15364, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is reviewed and approved by the Lead Agency before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, Tier 3 construction equipment, reduction in the number and/or horsepower rating of construction equipment, limiting the number of daily construction haul truck trips to and from the Proposed Project, and/or limiting the number of individual construction project phases occurring simultaneously, if applicable.

   b. Require the use of zero-emission or near-zero emission heavy-duty haul trucks during construction, such as trucks with natural gas engines that meet CARB's adopted optional NOx emissions standard of 0.02 grams per brake horsepower-hour (g/bhp-hr). At a minimum, require that operators of heavy-duty haul trucks visiting the Proposed Project during construction commit to using 2010 model year[6] or newer engines that meet CARB's 2010 engine emission standards of 0.01 g/bhp-hr for particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks. Include analyses to evaluate and identify sufficient power available for zero emission trucks and supportive infrastructures in the Energy and Utilities and Service Systems Sections of the Final MND, where appropriate. Require that the Proposed Project's tenant(s) shall maintain records of all trucks visiting the Proposed Project and make these records available to the Lead Agency upon request. The records will serve as evidence to prove that each truck called to the Proposed Project meets the minimum 2010 model year engine emission standards. The Lead Agency should conduct regular inspections of the records to the maximum extent feasible and practicable to ensure compliance with this mitigation measure.

   c. Maintain vehicle and equipment maintenance records for the construction portion of the Proposed Project. All construction vehicles must be maintained in compliance with the manufacturer's

[6] The CARB adopted the statewide Truck and Bus Regulation in 2010. The Regulation requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent. More information on the CARB's Truck and Bus Regulations is available at: https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.html.

recommended maintenance schedule. All maintenance records shall remain on-site for a period of at least two years from completion of construction.

d. Enter into a contract that notifies all construction vendors and contractors that vehicle idling time will be limited to no longer than five minutes or another time-frame as allowed by the California Code of Regulations, Title 13 section 2485 – CARB's Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling. For any vehicle that is expected to idle longer than five minutes, each project applicant, project sponsor, or public agency will require the vehicle's operator to shut off the engine. To further ensure that drivers understand the vehicle idling requirement, post signs at the entrance and throughout the site stating that idling longer than five minutes is not permitted.

e. Encourage construction contractors to apply for South Coast AQMD "SOON" funds. The "SOON" program provides funds to applicable fleets for the purchase of commercially-available low-emission heavy-duty engines to achieve near-term reduction of NOx emissions from in-use off-road diesel vehicles. More information on this program can be found at South Coast AQMD's website: http://www.aqmd.gov/home/programs/business/business-detail?title=off-road-diesel-engines.