



South Coast Air Quality Management District

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Mitigated Negative Declaration (MND) for the Leuzinger High School Athletic Facilities Improvements Project

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments on the CEQA construction air quality impacts analysis should be considered by the Centinela Valley Union High School District (Lead Agency) and included in the Final MND.

In the MND, the Lead Agency will demolish 20,000 square feet of existing structures and build outdoor sports fields and a bleacher system on 13 acres (Proposed Project). The Proposed Project is located on at 4118 West Rosecrans Avenue on the southeast corner of Larch Avenue and West Rosecrans Avenue in the City of Lawndale. Construction will take place over 17 months¹. During the grading phase, the Proposed Project will result in 20,000 cubic yards of soil for export and require approximately 10 trucks per day for 120 days to haul soil to the Azusa landfill². The Lead Agency calculated criteria pollutants emissions from construction activities and concluded that the maximum daily emissions from NO_x would be 73.84 pounds per day (lbs/day), which would not exceed South Coast AQMD regional air quality CEQA significance threshold for NO_x at 100 lbs/day for construction³. The Lead Agency also concluded that the Proposed Project's construction air quality impacts from other criteria pollutants would be less than significant.

Based on a review of the MND and technical appendices, South Coast AQMD staff found that the Lead Agency used a default one way trip length of 20 miles to quantify the Proposed Project's construction emissions from exporting soil during the grading phase. As shown in Table A below, the Azusa landfill facility to the Proposed Project is approximately 40 miles away (one way). The Proposed Project would require 10 trucks per day for 120 days for soil export. Using a default one way trip length of 20 miles likely underestimated the Proposed Project's construction emissions, particularly NO_x emissions, from haul truck trips for soil export. As such, South Coast AQMD staff recommends that the Lead Agency provide additional information in the Final MND to justify the use of a default one way trip length. Alternatively, to conservatively analyze the Proposed Project's construction air quality impacts, the Lead Agency should re-calculate the Proposed Project's construction emissions from haul truck trips based on a 40-mile one way trip length. If the Lead Agency finds, after revisions, that the Proposed

¹ MND. Page 4-65.

² MND. Page 3-5.

³ MND. Page 4-19.

Project’s construction emissions would be significant, mitigation measures will be required (CEQA Guidelines Sections 15070 and 15071).

Table A: Trip Length to Landfill Facility Identified in the MND

<u>Off-site Landfill Facility Identified in the MND</u>	<u>Location</u>	<u>Estimated One Way Trip Length from the Proposed Project</u>
Azusa Landfill	1211 West Gladstone, Azusa, California 91702	39.6 miles

Source: South Coast AQMD staff generated using Google Maps. Date: April 2021.

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.

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 me at lsun@aqmd.gov if you have questions or wish to discuss the comments.

Sincerely,
Lijin Sun
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 Program Supervisor, CEQA IGR
 Planning, Rule Development & Area Sources

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