



# South Coast Air Quality Management District

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E-MAILED: May 4, 2011

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Today's Fresh Start Charter School  
4514 Crenshaw Boulevard  
Los Angeles, CA 90043

**Draft Mitigated Negative Declaration (Draft MND) for the Proposed  
Site Acquisition and Construction of an Elementary School:  
Today's Fresh Start Charter School in Inglewood**

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance and should be incorporated into the Final CEQA document.

The Draft Mitigated Negative Declaration's (Draft MND) project description proposes an extension of existing water, sewer, and electric lines, and construction of building and foundation pads, etc. for the installation of two 2-story modular classroom buildings on a 2.5-acre site. In addition, a multipurpose building and a separate office building will be constructed and the existing 6-story office building will be remodeled. Although the lead agency has concluded that project construction and operational air quality impacts are less than significant, these impacts were not quantified in the Draft MND. Because this information has not been included in the Draft MND, the charter school has therefore not demonstrated that the proposed project will not generate significant adverse construction or operational air quality impacts that may trigger further analysis and consideration of mitigation measures pursuant to the California Environmental Quality Act.

To calculate the proposed project's emission impacts, the lead agency can utilize the current land use computer models, which 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 South Coast AQMD's CEQA Air Quality Handbook. Should the lead agency conclude after its analyses that construction or operational air quality impacts exceed the AQMD regional daily significance thresholds, staff has compiled mitigation measures to be implemented if the air quality impacts are determined to be significant. Mitigation measure suggestions can be found at [http://www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html).

In addition to evaluating the above-mentioned air quality impacts, the AQMD recommends that the charter school estimate 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. It is noted starting on page 2-3 under surrounding

land uses and in an aerial map inspection that the proposed project is located within one-quarter mile of sensitive receptors (residential properties) north, south, east and west of the proposed project. AQMD guidance for performing a localized air quality analysis can be found on the AQMD web page.<sup>1</sup> Should the charter school conclude after its analyses that construction or operational localized air quality impacts exceed the AQMD daily significance thresholds, mitigation measures should be implemented to reduce these impacts to a less than significant level.

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



Ian MacMillan  
Program Supervisor, Inter-Governmental Review  
Planning, Rule Development & Area Sources

IM:GM

LAC110407-03  
Control Number

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<sup>1</sup> <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>