



South Coast Air Quality Management District

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9401 S. Painter Avenue
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Draft Mitigated Negative Declaration (Draft MND) for the Proposed California High School Stadium Expansion Project

The South Coast Air Quality Management District (SCAQMD) 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 Mitigated Negative Declaration.

In the project description, the lead agency proposes to remove the existing 5,000 seat capacity stadium, turf football field and track. A 7,000 seat capacity stadium would then be constructed with an artificial turf field and track. In addition, the existing baseball and softball fields would be reconfigured along with various outdoor facilities that would undergo improvements. The proposed project would disturb (excavation, clearing and grading) approximately 26-acres of the campus adding about 2.98-acres of additional hard surface area.

In the Air Quality Section starting on page 55, the lead agency describes short-term construction activities that would result in construction emission impacts exceeding the SCAQMD recommended regional threshold of significance for NO_x, mainly from on-road vehicles hauling debris to unidentified landfill sites. To reduce the on-road emission impacts from hauling debris, the lead agency has proposed to limit the number of daily haul trips as a condition under which the contractor would operate during demolition. The SCAQMD staff recommends instead that this measure, as shown on page 59, be changed to limit the amount of vehicle miles traveled (VMT) since the disposal sites(s) and their respective distances have not been determined. This would seem more appropriate if, for example, the ultimate disposal site(s) were closer, more daily trips could be allowed. If the disposal site(s) are further from the project site, fewer trips would then be allowed.

Mitigation Measure

2. Prior to construction contract award, Whittier Union High School District shall specify in the construction bid that the construction contractor shall include limitations on the amount of demolition debris removed from the site per day based on vehicle miles traveled (VMT) once the ultimate disposal sites have been identified by the contractor(s) and consistent with the mitigated emissions analyzed as shown in the modeling results shown in Table 5-3. During demolition of the existing athletic fields and courts, the contractor shall limit demolition debris hauling to a maximum of ~~1,460 tons per day (e.g., 73 trucks per day if 20-ton capacity haul trucks are used)~~ the amount of VMT analyzed in the air quality analysis. The demolition debris hauling phase shall not overlap with any other construction phases, including rough grading and trenching. These requirements shall be noted on all construction management plans and verified by the District during demolition activities.

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 air quality 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
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IM:GM

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