



South Coast Air Quality Management District

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Pacific Charter School Development
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Review of the Draft Initial Study/ Mitigated Negative Declaration (IS/MND) for the Monseñor Oscar Romero Charter School (MORCS)

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are intended to provide guidance to the lead agency and should be incorporated into the revised or final Initial Study/Mitigated Negative Declaration, as appropriate.

Based on a review of the Draft IS/MND, the SCAQMD staff is concerned about the potential air quality impacts from the air pollutant emissions associated with the demolition, excavation/grading, and construction activities required for the proposed project. Although the construction air pollutant emissions from the project are estimated to be below the applicable thresholds, staff recommends that, in addition to compliance with SCAQMD Rule 403 – Fugitive Dust, the IS/MND should discuss how the project will comply with SCAQMD Rule 402 – Nuisance if volatile organic compounds and/or odors are emitted during soil excavation/disturbance and/or construction activities. Additionally, due to the proximity of the construction activities to school occupants and local residents, it is recommended that the lead agency take further precautions to minimize air quality impacts from sources of diesel particulate matter (diesel PM). Diesel PM is a toxic air contaminant and may be minimized by implementing procedures such as:

- Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export), or alternative-fueled vehicles.
- Require construction equipment to be outfitted with BACT devices certified by CARB.
 - ✓ A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.

- Wherever feasible, minimize the use of diesel-fueled electric generators during demolition and construction activities by utilizing electrical power from nearby existing facilities.

The SCAQMD staff is available to work with the Lead Agency to address these concerns and any other air quality questions that may arise. Please contact Tim Kobata, Air Quality Specialist at (909) 396-2862, if you have any questions regarding these comments. We look forward to reviewing and providing comment for the Final IS/MND associated with this project.

Sincerely,



Ed Eckerle
Program Supervisor
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EE:TK

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