



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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CEQA-comments@lausd.net

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Draft Environmental Impact Report for the Proposed Roosevelt High School Comprehensive Modernization Project (SCH No.: 2017101037)

The South Coast Air Quality Management District (SCAQMD) 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 EIR.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to modernize the campus for Roosevelt High School by demolishing temporary buildings and replacing them with permanent structures and buildings of approximately 236,000 square feet on 22.7 acres (Proposed Project). Construction is expected to be completed in 48 months¹. Because Roosevelt High School is an active campus, construction of the new buildings and modernization must be phased in a way to maintain the academic functions².

SCAQMD Staff's Comment – Overlapping Construction and Operational Impacts

In the Air Quality Section, the Lead Agency quantified the Proposed Project's regional construction and operational emissions³ and compared them to SCAQMD's air quality CEQA significance thresholds for construction and operation, respectively. Because of a phased project schedule, the Proposed Project's construction activities may overlap with operation of *new* buildings. In the case of overlapping construction and operation activities, SCAQMD staff recommends adding the construction and operational peak daily emissions in pounds per day and comparing those emissions to SCAQMD's air quality CEQA significance thresholds for *operation*⁴ to determine the level of significance.

SCAQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities

Since the Proposed Project would include demolition of a number of aged buildings⁵, asbestos may be encountered during demolition. As such, SCAQMD staff recommends that the Lead Agency include a discussion to demonstrate compliance with SCAQMD Rule 1403 in the Final EIR.

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), SCAQMD staff requests that the Lead Agency provide SCAQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements

¹ Draft EIR. Page 2.0-31.

² *Ibid.*

³ Draft EIR. Table 3.1-5 and Table 3.1-6. Pages 3.1-23 and 3.1-23.

⁴ South Coast Air Quality Management District. *Air Quality Significance Thresholds*. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>.

⁵ Draft EIR. Table 2.0-1. Page 2.0-11.

unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful or useful to decision makers and the public who are interested in the Proposed Project.

SCAQMD staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact me at lsun@aqmd.gov if you have any questions regarding the enclosed comments.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS

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