



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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Mitigated Negative Declaration (MND) for the Proposed Rise Kohyang High School Project (Bright Star Charter School)

South Coast Air Quality Management District (South Coast AQMD) 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 MND.

South Coast AQMD Staff's Summary of Project Description

The Lead Agency proposes to construct a new school with a 76,390-square-foot, two-story building containing 24 classrooms on 1.15 acres (Proposed Project). The Proposed Project would have a capacity to accommodate approximately 600 students. The Proposed Project is located at 3500 West 1st Street on the southwest corner of West 1st Street and Madison Avenue in the community of Koreatown. Upon review of Figure 3 in the MND and aerial photographs, South Coast AQMD staff found that residential uses and two schools are adjacent to the Proposed Project¹. Construction is anticipated to occur over 24 months and be completed in August 2022².

South Coast AQMD Staff's Summary of Air Quality Analyses

In the Air Quality Analysis section, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared those emissions to South Coast AQMD's recommended regional and localized air quality CEQA significance thresholds. Based on the analysis, the Lead Agency found that the Proposed Project's regional and localized construction and operational air quality impacts would be less than significant. The Lead Agency also included Standard Conditions of Approval for Air Quality (SC-AQ) 2 through SC-AQ-4³ from the Los Angeles Unified School District's (LAUSD) School Upgrade Plan (SUP), which is a programmatic EIR that guides the modernization of certain LAUSD schools, such as the Proposed Project. SC-AQ-2 through SC-AQ-4 include dust control measures, use of construction equipment that meets or exceeds Tier 3 emissions standards or Tier 4 emissions standards for engines between 50 and 750 horsepower, and other general construction mitigation measures⁴.

Guidance Regarding Siting New School Facilities

The California Public Resources Code 21151.8 and CEQA Guidelines Section 15186 establish special consultation requirements for school projects, which are meant to ensure that lead agencies consult with other agencies, such as the local air district, in order to carefully examine and disclose the potential health impacts that may result from siting a school within one-fourth mile of facilities that may reasonably be anticipated to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste. Since the Proposed Project involves construction of a new high school, the Proposed Project is

¹ MND. Section 2 Environmental Setting, 2.2 *Surrounding Land Uses*. Page 9.

² *Ibid.* Section 3 Project Description, 3.1.6 *Construction*. Page 28.

³ *Ibid.* Section 4 Environmental Checklist and Analysis. Page 50-52.

⁴ *Ibid.* Page 45.

subject to the consultation requirements. South Coast AQMD staff recommends that the Lead Agency review the respective CEQA Guidelines sections and meet the appropriate CEQA requirements, if applicable. For a search of South Coast AQMD permitted facilities pursuant to California Public Resources Code Section 21151.8 and CEQA Guidelines Section 15186, please fill out the “Grid Search Request Form” that is available at: <http://www.aqmd.gov/docs/default-source/aqmd-forms/Permit/ab3205-request-form.pdf>.

Conclusion

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, response 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 Robert Dalbeck, Assistant Air Quality Specialist, at RDalbeck@aqmd.gov or (909) 396-2139, should you have any questions.

Sincerely,

Lijin Sun

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Planning, Rule Development & Area Sources

LS:RD

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