



# South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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**Draft Initial Study/Mitigated Negative Declaration for the Proposed Classroom Expansion at the Existing Pressman Academy of Temple Beth Am Project Located at 1019-1057 S. La Cienega Blvd & 1036-1046 Corning Street, Wilshire District, City of Los Angeles (MND-NG-11-292-PL; ENV-2011-1535-REC-1)**

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 CEQA document.

In the Publication of Environmental Notices for the Los Angeles Times dated Thursday, October 2, 2014 and the Draft Initial Study/Mitigated Negative Declaration (DMND), the project descriptions are not consistent. In the Environmental Notice, the square footage for the new two-story classroom building and the square footage described in the DMND are different. The project is also described in two phases in the Environmental Notice and three phases in the DMND. In addition, the Environmental Notice does not include the one-level subterranean parking structure that is described in the DMND. These and any other discrepancies should be clarified in the Final MND.

Based on the Environmental Notice sent to the Los Angeles Times, the proposed project includes the expansion of the Early Childhood Center facility in two phases: Phase 1 includes demolition of the existing Pressman Early Childhood Center and five residential buildings. This would be followed by construction of a new two-story 21,000 square foot classroom building, an outdoor play area and a surface parking lot with 27 spaces that would connect to the existing parking lot off of La Cienega Boulevard. Phase 2 includes construction of two additional classrooms in a two-story building with 2,600 square feet of administrative office space that would be connected to the two-story building described in Phase 1. On page eight of the Initial Study, construction of a new one-level subterranean parking structure is also described. Although demolition and excavation would occur, estimates of the amounts of debris and potential soil import/export were not included in the project description including the potential disposal sites and their

distances. The estimated dates of each construction phase and whether any construction phases will overlap were also not included in the draft CEQA document.

On page 13 in the Air Quality Section, the Lead Agency determined that project air quality impacts would be potentially significant to nearby residences during construction activities but did not quantify project air quality impacts for either short- or long-term activities. Without quantifying project air quality impacts, the Lead Agency has not demonstrated that the proposed project will not generate significant adverse construction or operational air quality impacts that may trigger further analysis pursuant to the California Environmental Quality Act. Therefore, the SCAQMD staff recommends that the lead agency demonstrate that project impacts are less than significant in the Final MND by estimating short- and long-term air quality impacts using the current California Emission Estimator Model (CalEEMod).<sup>1</sup> CalEEMod is a statewide land use emissions model that can quantify potential project criteria pollutant and greenhouse (GHG) emissions. The lead agency can also estimate project emissions by following the calculation methodologies in Chapter 9 and the Appendix to Chapter 9 in the South Coast SCAQMD's CEQA Air Quality Handbook.<sup>2</sup> Should the lead agency conclude after its analyses that construction or operational air quality impacts exceed the SCAQMD daily significance thresholds, staff has compiled mitigation measures<sup>3</sup> in addition to the mitigation included in the DMND starting on page two of the DMND to be implemented if the air quality impacts are determined to be significant.

It is also recommended that the lead agency evaluate localized air quality impacts since it is noted on page eight of the DMND and in an aerial map inspection, the proposed project is located within one-quarter mile of sensitive receptors (multi-family residences) south and west of the project site. Therefore, the SCAQMD staff requests that the lead agency evaluate 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. SCAQMD guidance for performing a localized air quality analysis can also be found at the SCAQMD website.<sup>4</sup>

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 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.

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

<sup>2</sup> <http://www.aqmd.gov/ceqa/hdbk.html>

<sup>3</sup> [http://www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html)

<sup>4</sup> <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>

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Sincerely,

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JB:GM

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