



South Coast Air Quality Management District

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E-Mailed: June 21, 2013
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Ms. Adrianna D. Barrera
Los Angeles Community College District
770 Wilshire Boulevard
Los Angeles, CA 90017

Review of the Subsequent Draft Environmental Impact Report (Subsequent Draft EIR) for the Van De Kamp Innovation Center Project

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comment is intended to provide guidance to the lead agency and should be incorporated into the revised Subsequent Draft or Final Environmental Impact Report (Subsequent Draft or Final EIR) as appropriate.

Based on a review of the air quality analysis in the Subsequent Draft EIR the SCAQMD staff is concerned about the potential health risk impacts from placing sensitive receptors (i.e., children attending daycare and high school students) within close proximity to the Glendale Freeway (SR-2) a known significant emissions source. Specifically, the SCAQMD staff is concerned that the lead agency did not attempt to evaluate this emissions source nor provide adequate mitigation to address potentially significant public health impacts. Instead the lead agency concludes the project will not result in significant health risk impacts because the Glendale Freeway contains lower truck traffic volumes than other major freeways in the area and because student activity at the project site will be indoors. While these qualitative statements may accurately reflect the project setting they do not adequately substantiate the lead agency's conclusion of less than significant health risk impacts. Therefore, the lead agency should revise the Subsequent Draft EIR to include a health risk assessment (HRA) and if necessary include mitigation measures in the Final EIR that implement the use of buffers as specified by the CARB Handbook¹. Further, SCAQMD staff recommends that the lead agency provide additional mitigation measures to minimize the project's significant regional operational air quality impacts pursuant to Section 15126.4 of the California Environmental Quality Act (CEQA) Guidelines. Details regarding these comments are attached to this letter.

¹ California Air Resources Board. April 2005. "Air Quality and Land Use Handbook: A Community Health Perspective." Accessed at: <http://www.arb.ca.gov/ch/landuse.htm>

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,

A handwritten signature in black ink that reads "Ian V. MacMillan". The signature is written in a cursive style with a large initial "I" and "M".

Ian MacMillan
Program Supervisor, CEQA Inter-Governmental Review
Planning, Rule Development & Area Sources

Attachment

IM:DG

LAC130510-01
Control Number

Health Risk Assessment and Mitigation Measures

1. The SCAQMD staff is concerned that the proposed project could pose significant health risk impacts to students and children attending daycare from emissions sources that have not been quantified and disclosed in the Subsequent Draft EIR. Specifically, the lead agency is proposing an educational land use adjacent to the Glendale Freeway a prominent source of TACs. In Figure 4.1-3 of the Subsequent Draft EIR the lead agency indicates that the project would be less than 100 feet from the Glendale Freeway that carries approximately 149,000 vehicles per day. However, the lead agency determined that the project will not result in significant health risk impacts because the Glendale Freeway contains lower truck traffic volumes than other major freeways in the area and because student activity at the project site will be indoors. While these qualitative statements may accurately reflect the project setting they do not adequately substantiate the lead agency's conclusion of less than significant health risk impacts. Absent a quantitative HRA and effective mitigation the lead agency is unable to demonstrate that the proposed project will impose insignificant health risk impacts to existing and future sensitive receptors. Notably, children have been found to be particularly susceptible to health effects from freeway emissions. Therefore, the SCAQMD staff recommends that the lead agency revise the Subsequent Draft EIR to include an HRA and mitigation, if necessary, as specified by the CARB Handbook².

Operational Mitigation Measures

2. The lead agency determined that the proposed project will exceed the CEQA regional operational significance thresholds for NO_x emissions; therefore, SCAQMD staff recommends that the lead agency provide the following additional mitigation measures pursuant to CEQA Guidelines Section 15126.4.
 - a) Provide electric vehicle (EV) Charging Stations (see the discussion below regarding EV charging stations).
 - b) Provide food options and/or convenience stores on-site.
 - c) Maximize use of solar energy including solar panels; installing the maximum possible number of solar energy arrays on the building roofs and/or on the Project site to generate solar energy for the facility.
 - d) Require all lighting fixtures, including signage, to be state-of-the art and energy efficient, and require that new traffic signals have light-emitting diode (LED) bulbs and require that light fixtures be energy efficient compact fluorescent and/or LED light bulbs. Where feasible use solar powered lighting.
 - e) Maximize the planting of trees in landscaping and parking lots.
 - f) Use light colored paving and roofing materials.
 - g) Use passive heating, natural cooling, solar hot water systems, and reduced pavement.
 - h) Utilize only Energy Star heating, cooling, and lighting devices, and appliances.
 - i) Install light colored "cool" roofs and cool pavements.

² California Air Resources Board. April 2005. "Air Quality and Land Use Handbook: A Community Health Perspective." Accessed at: <http://www.arb.ca.gov/ch/landuse.htm>

- j) Limit the use of outdoor lighting to only that needed for safety and security purposes.
- k) Require use of electric lawn mowers and leaf blowers.
- l) Require use of electric or alternatively fueled sweepers with HEPA filters.

Electric Vehicle (EV) Charging Stations

Vehicles that can operate at least partially on electricity have the ability to substantially reduce the significant NOX impacts from this project. The cost of installing electrical charging equipment onsite is significantly cheaper if completed when the project is built compared to retrofitting an existing building. Therefore, the SCAQMD staff recommends the lead agency require vehicle parking areas to be constructed with the appropriate infrastructure to facilitate electric charging for vehicle plug-in. Similar to the City of Los Angeles requirements for all new projects, the SCAQMD staff recommends that the lead agency require at least 5% of all vehicle parking spaces to include EV charging stations¹. At a minimum, the electrical panels should be sufficiently sized to allow future upgrades and wiring should be provided to parking areas.

¹ http://ladbs.org/LADBSWeb/LADBS_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf