



# South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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## **Draft Environmental Impact Report (Draft EIR) for the Proposed Longfellow Elementary School Expansion (SCH No.:2018121059)**

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 EIR.

### South Coast AQMD Staff's Summary of Project Description

The Lead Agency proposes to demolish two residential units, a cul-de-sac, and 12 portable classroom buildings, and construct 26,600 square feet of classroom and administrative buildings, including a 21,000-square-foot parking lot and a 40,200-square-foot playground (Proposed Project). The Proposed Project is located at 3610 Eucalyptus Avenue in the City of Riverside on 6.9 acres. The Proposed Project will be constructed over a period of 12 months and is anticipated to be operational by 2021<sup>1</sup>.

Due to the historical residential usage of a portion of the Proposed Project site, the Lead Agency conducted a Phase I Environmental Site Assessment (ESA) and found that the soil is impacted with lead and chlordane, which is an organochlorine pesticide<sup>2</sup>. The Lead Agency stated in the Hazards and Hazardous Materials Section of the Draft EIR that a Removal Action Program would be implemented with oversight from the Department of Toxic Substances Control (DTSC) to remove 70 cubic yards (cy) of impacted soil from the Proposed Project site<sup>3</sup>.

### South Coast AQMD Staff's Summary of the Air Quality Analysis

In the Air Quality Analysis Section, the Lead Agency quantified the Proposed Project's construction and operational emissions associated with demolition and construction of school facilities 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 construction and operational air quality impacts associated with demolition and construction of school facilities would be less than significant. No mitigation for air quality was included<sup>4</sup>. The Lead Agency also included discussions on applicable South Coast AQMD rules<sup>5</sup>, including Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil<sup>6</sup>, Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities<sup>7</sup>, and Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants<sup>8</sup>.

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<sup>1</sup> Draft EIR. Page 3-3.

<sup>2</sup> *Ibid.* Page 8-16.

<sup>3</sup> *Ibid.*

<sup>4</sup> *Ibid.* Page 5.1-28.

<sup>5</sup> *Ibid.* Page 3-5.

<sup>6</sup> South Coast AQMD. Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>.

<sup>7</sup> South Coast AQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1403.pdf>.

South Coast AQMD Staff's Comments on the Construction Air Quality Analysis

In the Hazards and Hazardous Materials Section of the Draft EIR, the Lead Agency stated that 70 cy of impacted soil will be exported, hauled, and removed from the Proposed Project site. The soil removal activities would be carried out as part of Removal Action Program by the DTSC. However, at this time, the amount of clean soil that will need to be imported to the Proposed Project site is unknown<sup>9</sup>.

While the Air Quality Section in the Draft EIR quantified the Proposed Project's emissions from demolition and construction of the proposed school facilities, it did not quantify emissions from soil removal activities or implementation of the Removal Action Plan, which could take place concurrently with construction activities for the proposed school facilities. Additionally, soil removal activities will likely involve heavy-duty, diesel-fueled trucks. Their emissions should be included in the air quality analysis of the Final EIR. The Lead Agency should also use its good faith, best efforts to provide information on the scope, types, and duration of the soil removal activities and the Removal Action Program. Therefore, South Coast AQMD staff recommends that the Lead Agency revise the air quality analysis to provide such information, quantify emissions from soil removal activities and any actions or controls identified in the Removal Action Program, and include those emissions in the Proposed Project's construction emissions profile to be compared to South Coast AQMD's air quality CEQA significance thresholds for construction to determine the level of significance in the Final EIR. Alternatively, the Lead Agency should include a new air quality mitigation measure in the Air Quality Section of the Final EIR to commit to evaluating subsequent soil removal activities and the Removal Action Program through a CEQA process prior to commencing the Proposed Project's construction activities.

If there is any information in the subsequent CEQA process suggesting that the soil removal activities or any actions that will be identified in the Removal Action Plan, after consultation with the DTSC, would result in significant adverse air quality impacts not analyzed in the Final EIR for the Proposed Project, or substantially more severe air quality impacts than those analyzed in the Final EIR for the Proposed Project, the Lead Agency should commit to reevaluating the Proposed Project's air quality impacts through a CEQA process (CEQA Guidelines Section 15162).

Responsible Agency and South Coast AQMD Permits

It is also important to note that generally, operation of portable engines and portable equipment units of 50 horsepower or greater that emit particulate matter require a permit from South Coast AQMD or registration under the Portable Equipment Registration Program (PERP) through the California Air Resources Board (CARB)<sup>10</sup>. The Lead Agency should consult with South Coast AQMD's Engineering and Permitting staff to determine if there is any diesel-powered equipment during implementation that will require a South Coast AQMD permit or if the equipment will need to be registered under the PERP through CARB. If a permit from South Coast AQMD is required, South Coast AQMD should be identified as a Responsible Agency for the Proposed Project in the Final EIR. Any assumptions used in the Air Quality Analysis in the Final EIR will be used as the basis for permit conditions and limits for the Proposed Project. Should there be any questions on permits, please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385. For more general information on permits, please visit South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>. For more information on the PERP Program, please contact CARB at (916) 324-5869 or visit CARB's webpage at: <https://ww2.arb.ca.gov/our-work/programs/portable-equipment-registration-program-perp>.

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<sup>8</sup> South Coast AQMD Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants. Accessed at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf>.

<sup>9</sup> Draft EIR. Page 8-16.

<sup>10</sup> South Coast AQMD. *Portable Equipment Registration Program (PERP)*. Accessed at: <http://www.aqmd.gov/home/permits/equipment-registration/perp>

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), South Coast AQMD staff requests that the Lead Agency provide South Coast AQMD 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 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, informative, or useful to decision makers and to 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 Alina Mullins, Assistant Air Quality Specialist, at [amullins@aqmd.gov](mailto:amullins@aqmd.gov) or (909) 396-2402, should you have any questions.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment  
LS:AM  
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