



South Coast Air Quality Management District

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Review of the Final Subsequent Environmental Impact Report (Final EIR) for the Proposed 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 Final Subsequent Environmental Impact Report (EIR) as appropriate.

In a comment letter submitted to the lead agency on June 21, 2013 regarding the Draft Subsequent EIR for the proposed project SCAQMD staff expressed concern that the lead agency did not demonstrate that the project will have less than significant health risk impacts to students/children (i.e., sensitive receptors)¹ at the project site. Specifically, SCAQMD staff expressed concern that the lead agency did not conduct a quantitative health risk assessment (HRA) instead relying on qualitative statements to determine the project's level of significance. As a result, the SCAQMD staff recommended that the lead agency conduct a quantitative HRA to account for potentially significant sources of toxic air contaminants (TAC's) surrounding the project site, including; the Glendale Freeway (SR2) less than 100 feet from the project site and carrying approximately 149,000 vehicles per day.

In response to the SCAQMD staff's comments the lead agency completed an HRA for the proposed project. However, upon review of the HRA it does not appear that the lead agency accounted for all significant sources of TAC's surrounding the project site. For example, the lead agency did not account for the active rail line adjacent to the project site. Further, it appears that the lead agency inadvertently miscalculated the risks from the SR2 due to an incorrect aggregated emission factor and incorrect exposure value factor (EVF) or student exposure period. Therefore, SCAQMD staff recommends that the lead agency revise the HRA to account for all potential sources of TAC's within a ¼ mile of the project site and correct the technical errors (i.e., aggregate emission factor and

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>

EVF) mentioned above. In the event that the lead agency determines the project will expose students/children to significant health risk impacts the SCAQMD staff recommends that the lead agency incorporate additional mitigation to minimize these impacts pursuant to Section 15126.4 of the CEQA Guidelines. Details regarding these comments are attached to this letter.

Please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final Subsequent 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,



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

Attachment

IM:DG

LAC130903-05
Control Number

Emissions Sources

1. Based on a review of Figure 3-2 of the Subsequent Draft EIR the project is adjacent to Metrolink right-of-way (i.e., an active rail line owned by the Southern California Regional Rail Authority) to the west and commercial uses surrounding the project's eastern, northern and southern boundaries. However, the HRA does not discuss or quantify any emissions from these potential sources. For example, according to the recent rail crossing inventory provided by the U.S. Department of Transportation the aforementioned rail line facilitates 83 trains per day near the project site.² All of these trains appeared to be powered by diesel engines. As a result, SCAQMD staff is concerned that absent quantification of these potential emissions sources the HRA may have underestimated the potential health risk impacts to students/children at the project site. Therefore, the SCAQMD staff recommends that the lead agency revise the HRA to account for all potential sources of TAC's within a ¼ mile of the project site. This will ensure that potential health risks are assessed at the same level as is required for all other new public school projects as required by Education Code 17213.

HRA Freeway Emission Factors

2. The aggregated emissions data summarized below the SR 2 Emission Rate Tables in the appendix to the HRA appear to be low. Specifically, the aggregated emission factors appear to be lower than the emission factor for the individual vehicle classifications. For example, below the SR2 West Emissions Rate Table the aggregated emissions reported for all diesel trucks west bound on the SR2 is 0.0000259 grams per second (g/s). However, the value for the T7 Diesel category alone is 0.000086 g/s representing a higher value for this single category of trucks than the aggregate of all diesel trucks categories on the west bound segment of the SR2. As a result, it appears the lead agency may have miscalculated the volume of emissions from the SR2 resulting in an underestimate of the project's health risk impacts. Therefore, SCAQMD staff recommends that the lead agency revise the HRA to include the correct aggregated emission factors.

Exposure Value Factor (EVF)

3. Based on table in the HRA it appears that the parameters used to evaluate cancer risk were revised. Specifically, the standard EVF used was 0.042 based on an adjustment factor for student receptors at school sites. This modified EVF is not consistent with SCAQMD guidance and SCAQMD staff does not recommend revising the EVF for school sites. Therefore, the SCAQMD staff recommends that the lead agency revise the HRA to base the health risk impacts on a EVF of 0.96 consistent with Table 9B in SCAQMD Permit Application Package "L".

Mitigation for Potentially Significant Health Risk Impacts

4. If upon revising the HRA the lead agency determines that the proposed project will expose students/children to significant health risk impacts the SCAQMD staff

²U.S. DOT rail crossing inventory information near the project site (Fletcher Drive) is available at: <http://safetydata.fra.dot.gov/OfficeofSafety/publicsite/crossing/XingLocResults.aspx?state=06&countycity=037&railroad=&reportinglevel=ALL&radionm=County&street=Fletcher+Drive&xingtype=%25&xingstatus=1&xingpos=%25>

recommends that the lead agency incorporate additional mitigation to minimize these impacts pursuant to Section 15126.4 of the CEQA Guidelines. For example, consider limiting outdoor student activities in areas near significant emissions sources.