



# South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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## **Draft Mitigated Negative Declaration (DMND) for the Proposed Oakwood School Expansion Project (ENV-2015-1437-MND)**

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 DMND, the Lead Agency proposes a building expansion over a 20-year period that increases the school's building floor space from 111,025 to 245,370 gross square feet. The proposed project includes demolition and replacement of existing buildings and new building construction. Additional land has been acquired that would increase the school acreage from 2.74 to a total of 5.39 acres. This expansion will support an increase in the student capacity by 78 students, from a current capacity enrollment of 452 students to a total enrollment of 520 students. The expansion would also enable the number of classrooms to increase from 46 to 72. The project site is surrounded by residences north, south and west of the project area and State Route 170 (SR-170),<sup>1</sup> just east of the project site.

### Evaluating Adverse Health Impacts from Traffic Operating on the SR-170 Freeway

The SCAQMD staff is concerned that the proposed increase in student and associated staff will be exposed to existing adverse air quality impacts from toxic air contaminants and roadway dust coming from the vehicle traffic operating on the adjacent I-170 Freeway. Because of the close proximity to the freeway, students, faculty and administrative staff would be exposed to diesel particulate matter, which is a toxic air contaminant. Based on the site plans, students, faculty and administrative staff would be located within the recommended advisory 500 foot buffer. The SCAQMD staff therefore

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<sup>1</sup> <http://traffic-counts.dot.ca.gov/> California Dept. of Transportation Traffic and Truck Volumes: Traffic Volumes (SR-170/Magnolia Blvd) and Truck Traffic Volumes (SR-170/ Junction Routes 101/134). Back Peak Month (average daily traffic for the month of heaviest traffic flow) is 191,000 daily vehicles. Truck Total Percentage is 3.88 or 7,410 daily trucks.

recommends that the Final MND include an evaluation of the potential health risks to the sensitive receptors at the site including current and future students, faculty and administrative staff by preparing a Health Risk Assessment (HRA). The unmitigated results should be compared with recognized significance thresholds along with the effectiveness of any proposed mitigation to reduce impacts. Since numerous health studies have demonstrated the potential adverse health effects of living near highly travelled roadways, the California Air Resources Board (CARB) recommended in 2005 avoiding the siting of new sensitive receptors<sup>2</sup> within 500 feet of a freeway in their Land Use Handbook.<sup>3</sup> Since the time of that study, additional research has continued to build the case that the near roadway environment also contains elevated levels of many pollutants that adversely affect human health, including some pollutants that are unregulated (e.g., ultrafine particles) and whose potential health effects are still emerging.<sup>4</sup>

### Limitations to the Effectiveness of Filters as Mitigation

Using the proposed air filters as mitigation has limitations. It should be noted that these filters have no ability to filter out any toxic gasses from vehicle exhaust and residents will not be protected outside of their homes while relaxing outside, playing in a common area, washing a vehicle or when the windows or doors are open. Further, the heating, ventilation and air conditioning (HVAC) system and as well as the filters have to be serviced/replaced as required by manufacturer recommendations with annual replacement costs expected to range from \$120 to \$240 to replace each filter<sup>5</sup>. Adequate pressure must also be maintained within the residences and it is assumed that the filters will operate 100 percent of the time while residents are indoors.

### Compliance With SCAQMD Rule 1403 During Demolition/Renovation Activities

Based on the proposed demolition of existing structures, the Lead Agency should describe compliance with SCAQMD Rule 1403 - Asbestos Emissions from Demolition/Renovation Activities due to the potential of discovering asbestos during the demolition activities described in the project description.

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<sup>2</sup> Residences, schools, hospitals, etc.

<sup>3</sup> 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>

<sup>4</sup> See Chapter 9 of the 2012 AQMP for further information

Accessed at: [http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2012-air-quality-management-plan/final-2012-aqmp-\(february-2013\)/chapter-9-final-2012.pdf](http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2012-air-quality-management-plan/final-2012-aqmp-(february-2013)/chapter-9-final-2012.pdf).

<sup>5</sup> <http://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf?sfvrsn=0>. This study evaluated filters rated MERV 13+ while the proposed mitigation calls for less effective MERV 12 or better filters. See also CARB link for the "Status of Research on Potential Mitigation Concepts to Reduce Exposure to Nearby Traffic Pollution" (August 23, 2012):

[http://www.arb.ca.gov/db/search/search\\_result.htm?q=Potential+Mitigation+Concepts+to+Reduce+Exposure+to+Nearby+Traffic+Pollution&which=arb\\_google&cx=006180681887686055858%3AbeW1c4wl8hc&srch\\_words=&cof=FOURID%3A11](http://www.arb.ca.gov/db/search/search_result.htm?q=Potential+Mitigation+Concepts+to+Reduce+Exposure+to+Nearby+Traffic+Pollution&which=arb_google&cx=006180681887686055858%3AbeW1c4wl8hc&srch_words=&cof=FOURID%3A11).

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.

Sincerely,

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