



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

April 23, 2019

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Draft Focused Environmental Impact Report (Draft FEIR) for the Proposed Beach Casa Blanca Elementary School (SCH No.: 2018101073)

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 FEIR.

South Coast AQMD Staff's Summary of Project Description

The Lead Agency proposes to construct a new elementary school with three academic buildings totaling 100,500 square feet, and 240,870 square feet of recreational uses on 9.8 acres (Proposed Project). The Proposed Project is located at 7351 Lincoln Avenue on the northeast corner of Bunker Street and Lincoln Avenue within the City of Riverside. Based upon a review of the Draft FEIR, aerial photographs, and South Coast AQMD's publically accessible Facility Information Detail (F.I.N.D.) system¹, South Coast AQMD staff found that a South Coast AQMD permitted facility is within one-fourth mile of the Proposed Project².

South Coast AQMD Staff's Summary of Air Quality Analysis

In the Air Quality Analysis section, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared those emissions to South Coast AQMD's recommended regional and localized air quality CEQA significance thresholds. Based on the analyses, the Lead Agency found that the Proposed Project's regional and localized construction and operational air quality impacts would be less than significant³. The Lead Agency also prepared a construction HRA and compared the results to South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk⁴. The Lead Agency found that the Proposed Project's construction activities would result in a cancer risk of 2.3 in one million at the maximum impacted sensitive receptor after the incorporation of Mitigation Measure AIR-1, which requires the use of Tier 4 Interim equipment during construction⁵.

¹ South Coast AQMD, Facility Information Detail (F.I.N.D.) Accessed at: <https://xappprod.aqmd.gov/find/>. F.I.N.D. is South Coast AQMD's publically accessible, online facility database, which provides non-confidential facility information, including: Facility Details, Equipment, Compliance, and Emissions Reports.

² South Coast AQMD, F.I.N.D. Facility ID# 32757. Accessed at: <https://xappprod.aqmd.gov/find/facility/AQMDsearch?facilityID=32757>

³ Draft FEIR. Section 3: Environmental Impact Analysis "Air Quality". Page 3.1-33-42.

⁴ South Coast AQMD has developed the CEQA significance threshold of 10 in one million for cancer risk. When South Coast AQMD acts as the Lead Agency, South Coast AQMD staff conducts a HRA, compares the maximum cancer risk to the threshold of 10 in one million to determine the level of significance for health risk impacts, and identifies mitigation measures if the risk is found to be significant.

⁵ Draft FEIR. Section 3: Environmental Impact Analysis "Air Quality". Page 3.1-41.

Guidance Regarding Siting School Facilities near Potential Sources of Air Pollution

The California Public Resources Code 21151.8 and CEQA Guidelines Section 15186 establish special consultation requirements for school projects, which are meant to ensure that lead agencies consult with other agencies, such as the local air district, in order to carefully examine and disclose the potential health impacts that may result from siting a school within one-fourth mile of facilities that may reasonably be anticipated to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste. In the main body of the Draft FEIR the Lead Agency discussed the California Air Resources Board Air Quality and Land Use Handbook's recommendations for siting new sensitive receptors in close proximity to certain land uses. The discussion included a list of land uses near the Proposed Project that may be potential sources of toxic air contaminants including a heavily traveled road, a distribution center, a railway, and two South Coast AQMD permitted facilities (e.g., a fueling station and a dry cleaning operation)⁶. However, based upon a review of the publically available F.I.N.D. system, it appears to South Coast AQMD staff that a South Coast AQMD permitted gasoline storage and dispensing facility (South Coast AQMD Facility ID# 32757)⁷ is located one-fourth mile from the Proposed Project and has not been included in the discussion. Therefore, South Coast AQMD staff recommends that the Lead Agency revise the Air Quality Analysis to discuss this permitted facility and any associated health impacts in the Final FEIR.

Since the Proposed Project involves construction of a new elementary school, the Proposed Project is subject to the consultation requirements pursuant to California Public Resources Code 21151.8 and CEQA Guidelines Section 15186. South Coast AQMD staff recommends that the Lead Agency review these sections and meet the appropriate CEQA requirements, if applicable. For a search of South Coast AQMD permitted facilities pursuant to California Public Resources Code Section 21151.8 and CEQA Guidelines Section 15186, please fill out the "Grid Search Request Form" that is available at: <http://www.aqmd.gov/docs/default-source/aqmd-forms/Permit/ab3205-request-form.pdf>.

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 FEIR. 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 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

LS:AM

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Control Number

⁶ Draft FEIR. Section 3: Environmental Impact Analysis "Air Quality". Page 3.1-42-3.

⁷ South Coast AQMD, F.I.N.D. Facility ID# 32757. Accessed at: <https://xapprod.aqmd.gov/find//facility/AQMDsearch?facilityID=32757>