



South Coast Air Quality Management District

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Review of the Mitigated Negative Declaration (MND) for the Proposed Mission Elementary School Modernization Project

The South Coast Air Quality Management District (AQMD) 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 California Environmental Quality Act (CEQA) document as appropriate.

Asbestos Containing Materials

The AQMD staff is concerned about the potential release of asbestos emissions from the renovation and demolition activities during the construction phase of the proposed project. On page 40 of the MND the lead agency states that a facility evaluation conducted at the project site indicates a presence of asbestos in the existing structures. The lead agency goes on to provide Mitigation Measure H-1 (MM H-1) to reduce the significance of this impact. AQMD staff recommends that the lead agency modify MM H-1 to:

~~Prior to commencement~~ For all demolition and renovation activities the applicant shall comply with AQMD Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities) and previously identified areas of the site containing all asbestos containing materials (ACMs) shall be removed by a contractor registered with Asbestos Contractors Registration Unit, as required by state law.

Surrounding Agricultural Land Uses

In addition to asbestos containing materials at the project site the AQMD staff is concerned about potential exposure of sensitive receptors (i.e., students and staff) to pesticide emissions from existing agricultural operations surrounding the project site. Therefore, AQMD staff recommends that the lead agency provide information on pesticide regulations applicable to the agricultural operation surrounding the project site and discuss any potential impacts to onsite sensitive receptors from exposure to pesticide

emissions. If pesticide emissions and toxicity are found to be above de minimis levels, AQMD staff recommends that the lead agency conduct a health risk assessment. In the event that the lead agency identifies any significant impacts from pesticide emissions AQMD staff recommends that the lead agency provide mitigation in accordance with section 15370 of the CEQA Guidelines, to the extent feasible.

AQMD staff is available to work with the lead agency to address any issues identified herein 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

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