



South Coast Air Quality Management District

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Subsequent Draft Environmental Impact Report (SDEIR) for the Proposed Firestone Education Center Master Plan

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 CEQA document.

In the project description, the lead agency proposes an adult-education center as part of a two-phase re-use of existing industrial buildings. Currently, the education center is located across Firestone Boulevard southwest of the proposed site and has an enrollment of approximately 4,056 students. In Phase I, demolition of two existing buildings totaling 516,578 square feet would occur followed by construction of a new 136,500 square foot building that would allow the college to vacate its existing building across Firestone Boulevard and would accommodate a projected maximum student enrollment of 7,500 students. Phase I would also include construction of a 1,700 space parking structure, entry drives, surface parking, and a campus plaza. In Phase II, the existing Building 1, with a total area of approximately 455,949 square feet, would be renovated as an indoor campus to accommodate up to 12,000 students by year 2025. In addition, an area near Building 1 would also include an outdoor play area for the future Child Development Center.

The AQMD staff is concerned that the lead agency has not evaluated the potential health risks to children at this education center from nearby sources of diesel particulate matter, including a nearby metal recycling facility, the Alameda Corridor, and truck emissions from local warehouses (on- and off-site). Since the California Air Resources Board has classified the particulate portion of diesel exhaust emissions as carcinogenic, and children will regularly be present on-site, the lead agency should conduct a health risk assessment and present the results in the Final SDEIR. The SCAQMD has developed a methodology for estimating cancer risks from mobile sources in a document entitled Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions.¹ Should significant impacts be identified in the health risk assessment, all feasible mitigation measures should be incorporated to reduce these impacts to a less than significant level.

¹ http://www.aqmd.gov/ceqa/handbook/mobile_toxic/diesel_analysis.doc

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Pursuant to Public Resources Code Section 21092.5, please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. The AQMD staff is available to work with the Lead Agency to address these issues and any other air quality 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,



Ian MacMillan
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IM:GM

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