



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Draft Environmental Impact Report (Draft EIR) for the Proposed Long-Range Development Plan Mt. San Antonio College 2018 Educational and Facilities Master Plan Project (SCH No.: 2018091004)

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 EIR.

South Coast AQMD Staff's Summary of Project Description

The Lead Agency proposes to demolish 33 buildings totaling 207,805 square feet, construct 13 new buildings totaling 752,000 square feet, and renovate nine existing buildings totaling 405,023 square feet with four parking structures on 418.44 acres (Proposed Project). The Proposed Project is located on the southeast corner of North Grand Avenue and Mountaineer Road within the City of Walnut. Construction is anticipated to begin in 2019 and will occur in three phases (Phases 1A, 1B, and 2) over a 10-year period with overlapping construction and operational years. The Proposed Project is anticipated to be fully operational by 2027¹. The Proposed Project will be designed to address the goals of the Mt. San Antonio College (Mt. SAC) 2018 Climate Action Plan (2018 CAP)² with implementation of features such as the Leadership in Energy and Environmental Design (LEED) Silver standards, and the 2016 Title 24 California Green Building Standards Code³.

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 for Phases 1A and 1B of the Proposed Project 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 air quality impacts from Phases 1A and 1B would be significant for NO_x at 241 pounds per day (lbs/day)⁴. However, with the implementation of Mitigation Measure (MM) AQ-1, which requires that all off-road diesel-powered construction equipment greater than 50 horsepower (hp) meet Tier 4 standards⁵, construction-related NO_x emissions would be reduced to 54 lbs/day⁶, which is below South Coast AQMD's air quality CEQA significance threshold for construction. The Lead Agency also found that the Proposed Project's operational air quality impacts from Phases 1A and 1B would be less than significant⁷. Based on the findings of significance for the construction and operational analyses for Phases

¹ Draft EIR. Section 1. Executive Summary. Page 1-4.

² Draft EIR. Project Description. Pages 3-43 through 47.

³ *Ibid.* Section 4.2. Air Quality. Page 4.2-7.

⁴ *Ibid.* Page 4.2-20.

⁵ *Ibid.* Page 4.2-26

⁶ *Ibid.*

⁷ *Ibid.* Page 4.2-21 through 20.

1A and 1B, the Lead Agency found that emissions from Phase 2 would be comparable to the earlier phases, and therefore less than significant with the implementation of MM AQ-1⁸.

South Coast AQMD Staff's General Comments

South Coast AQMD staff has comments on the Air Quality Analysis. The Lead Agency did not quantify regional or localized construction emissions from Phase 2 and did not analyze a scenario where construction activities of one development phase overlap with operational activities of one or two development phases. Please see the attachment for more information. Should the Lead Agency find that, after revisions to the Air Quality Analysis, the Proposed Project will have significant air quality impacts, then mitigation measures will be required. The attachment includes a list of potential mitigation measures as guidance to the Lead Agency that should be reviewed for incorporation in the Final EIR. The attachment also includes recommendations to include discussions of South Coast AQMD rules applicable to the Proposed Project in the Final EIR.

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 EIR. 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. Further, when the Lead Agency makes the finding that the recommended mitigation measures are not feasible, the Lead Agency should describe the specific reasons for rejecting them in the Final EIR (CEQA Guidelines Section 15091).

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

Attachment
LS:AM
LAC190409-14
Control Number

⁸ *Ibid.* Pages 4.2-18 through 26.

ATTACHMENT

Air Quality Impact Analysis – Construction Impact Analysis

1. The Lead Agency quantified the Proposed Project’s construction emissions from Phases 1A and 1B, and found that emissions would not be significant with the implementation of MM AQ-1, which requires that all off-road diesel-powered construction equipment greater than 50 horsepower (hp) meet Tier 4 standards. The Lead Agency did not quantify construction emissions from Phase 2 activities. The Lead Agency stated that “[...] construction details for Phase 2 are too speculative to be quantified at this time”⁹. Further, the Lead Agency found that “Phase 2 emissions are likely to be comparable to or less than Phase 1A and 1B emissions [...] and would be required to comply with MM AQ-1 to reduce impacts to less than significant”¹⁰.

When specific development is reasonably foreseeable as a result of the goals, policies, and guidelines in the Proposed Project, the Lead Agency should identify any potential adverse air quality impacts and sources of air pollution that could occur using its best efforts to find out and a good-faith effort at full disclosure in the EIR. The degree of specificity will correspond to the degree of specificity involved in the underlying activity which is described in the EIR (CEQA Guidelines Section 15146). When quantifying air quality emissions, emissions from both construction (including demolition, if any) and operations should be calculated.

Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). South Coast AQMD staff recommends that the Lead Agency quantify the Proposed Project’s construction emissions and compare those emissions to South Coast AQMD’s regional air quality CEQA significance thresholds for construction to determine the level of significance. The Lead Agency should use the current version of California Emission Estimator Model (CalEEMod)¹¹ to quantify construction emissions.

As discussed in Section 3.5.3 “Buildings/Facilities” in the Draft EIR, the Lead Agency has identified the estimated development potential of the Proposed Project. For example, in this section, the Lead Agency discussed New Major Buildings, Major Renovations, and Minor Projects that are proposed as part of Phase 2 of the Proposed Project. These include, but are not limited to, new construction of 75,000-square-foot auditorium, a 15,000-square-foot campus safety facility, a 75,000-square-foot student services building, 200,000 square feet of new academic buildings, and renovations to 347,870 square feet of existing academic buildings¹². Therefore, based on the development potential for Phase 2 that is already known at the time the Draft EIR is prepared, the Lead Agency can and should use its best efforts to identify construction activities that would be required to implement Phase 2 of the Proposed Project and quantify associated construction emissions, including emissions from any demolition activities. Otherwise, there is no substantial evidence to support that Phase 2 of the Proposed Project would be comparable to Phases 1A and 1B and the Lead Agency’s finding that Phase 2’s construction air quality impacts can and would be reduced to less than significant with just the implementation of MM AQ-1. The recommended analysis will facilitate the goal and purpose of CEQA on public disclosure with useful information on the kind, size, scope, intensity, duration, and location of construction activities in Phase 2 to foster meaningful public participation and informed decision making.

⁹ Draft EIR. Section 4.2 Air Quality. Page 4.2-19.

¹⁰ *Ibid.* Page 4.2-20.

¹¹ South Coast AQMD. CalEEMod Version 2016.3.2. Accessed at: <http://www.aqmd.gov/caleemod/download-model>.

¹² Draft EIR. Section 3 Project Description. Page 3-28.

Air Quality Impact Analysis – Overlapping Construction and Operational Impacts

2. Based on a review of the Air Quality Analysis, South Coast AQMD staff found that the Lead Agency did not consider nor analyze a scenario where construction activities overlap with operational activities (e.g., one phase implementing the Proposed Project is operational while another phase implementing the Proposed Project is under construction). Since implementation of the Proposed Project is expected to occur over a multi-year timeframe of 10 years from 2019 to 2027¹³, an overlapping construction and operation scenario is reasonably foreseeable, unless the Proposed Project includes requirement(s) that will prohibit overlapping construction and operational activities. To conservatively analyze a worst-case impact scenario that is reasonably foreseeable at the time the Draft EIR is prepared, South Coast AQMD staff recommends that the Lead Agency use its best efforts to identify the overlapping construction and operational years, combine construction emissions (including emissions from demolition) with operational emissions, and compare the combined emissions to South Coast AQMD's air quality CEQA *operational* thresholds of significance to determine the level of significance in the Final EIR.

Air Quality Analysis – Localized Significance Thresholds (LSTs) Analysis

3. The Lead Agency quantified the Proposed Project's localized construction emissions from Phases 1A and 1B, and using the LSTs at 25 meters for Source Receptor Area 10, found that localized construction air quality impacts would not be significant¹⁴. The Lead Agency did not quantify localized construction emissions from activities implementing Phase 2 of the Proposed Project. The Lead Agency stated that, "[e]missions from Phase 2 emissions would be comparable to or less than the emissions generated from overlapping phasing of Phases 1A and 1B, and the receptors would be greater than the 25-meter-threshold used in this analysis. Therefore [...] localized emissions would be less than the respective LST threshold for Phase 2"¹⁵.

The Proposed Project is surrounded by sensitive receptors¹⁶. South Coast AQMD staff recommends that the Lead Agency use its best efforts, based on the estimated development potential that is already available at the time the Draft EIR is prepared such as the maximum build-out of nonresidential uses in square feet¹⁷, to quantify localized construction emissions from Phase 2 and disclose the localized air quality impacts in the Final EIR. South Coast AQMD guidance for performing a localized air quality analysis is available on South Coast AQMD website¹⁸.

Additional Recommended Mitigation Measures

4. In the event that, upon revisions to the Air Quality Analysis based on Comment Nos. 1 to 3, the Lead Agency finds that the Proposed Project would result in significant adverse air quality impacts from construction, mitigation would be required (CEQA Guidelines Section 15126.4.). Therefore, South Coast AQMD staff has compiled a list of recommended mitigation measures as suggested resources and guidance to the Lead Agency to assist in the identification of feasible mitigation measures for incorporation in the Final EIR. For more information on potential mitigation measures as guidance to the Lead Agency, please visit South Coast AQMD's CEQA Air Quality Handbook website¹⁹.

¹³ Draft EIR. Section 1. Executive Summary. Page 1-4.

¹⁴ *Ibid.* Section 4.2 Air Quality. Page 4.2-21.

¹⁵ *Ibid.*

¹⁶ *Ibid.*

¹⁷ Draft EIR. Section 3 Project Description. Page 3-28.

¹⁸ South Coast AQMD. Localized Significance Thresholds. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

¹⁹ South Coast Air Quality Management District. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

Mitigation Measures for Construction Air Quality Impacts

- Require the use of zero-emission (ZE) or near-zero emission (NZE) on-road haul trucks (e.g., material delivery trucks and soil import/export) such as heavy-duty trucks with natural gas engines that meet the California Air Resources Board (CARB)'s adopted optional NOx emission standard at 0.02 grams per brake horsepower-hour (g/bhp-hr). When requiring ZE or NZE on-road haul trucks, the Lead Agency should include analyses to evaluate and identify sufficient power and supportive infrastructure available for ZE/NZE trucks in the Energy and Utilities and Service Systems Sections of the Final EIR, where appropriate.

CARB also adopted the statewide Truck and Bus Regulation in 2010. The Regulation requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent²⁰. Since the construction schedule of the Proposed Project extends beyond 2023 till 2027, 2010 model year trucks will be required for the Proposed Project and should become more widely available commercially. Therefore, South Coast AQMD staff recommends that the Lead Agency implement the Truck and Bus Regulation early and require, at a minimum, that construction vendors, contractors, and/or haul truck operators commit to using 2010 model year or newer engines that meet CARB's 2010 engine emission standards at 0.01 g/bhp-hr of particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks. Early implementation of the Truck and Bus Regulation at the Proposed Project will develop a construction management plan to prefer construction contractor(s) who can supply 2010 model year trucks, help facilitate the transition to 2010 model year trucks in 2023, provide time and opportunities to resolve implementation challenges ahead of 2023, ease the costs and burden of regulatory compliance, and yield emission reductions from fleets earlier than 2023.

To monitor and ensure ZE, NZE, or 2010 model year trucks are used at the Proposed Project, the Lead Agency should require that operators maintain records of all trucks associated with the Proposed Project's construction and make these records available to the Lead Agency upon request. The records will serve as evidence to prove that each truck called to the Proposed Project during construction meets the minimum 2010 model year engine emission standards. Alternatively, the Lead Agency should require periodic reporting and provision of written records by contractors, and conduct regular inspections of the records to the maximum extent feasible and practicable.

- Maintain equipment maintenance records for the construction portion of the Proposed Project. All construction equipment must be tuned and maintained in compliance with the manufacturer's recommended maintenance schedule and specifications. All maintenance records for each equipment and their construction contractor(s) should be made available for inspection and remain on-site for a period of at least two years from completion of construction.
- Encourage construction contractors to apply for South Coast AQMD "SOON" funds. The "SOON" program provides funds to applicable fleets for the purchase of commercially-available low-emission heavy-duty engines to achieve near-term reduction of NOx emissions from in-use off-road diesel vehicles. More information on this program can be found at South Coast AQMD's website: <http://www.aqmd.gov/home/programs/business/business-detail?title=off-road-diesel-engines>.

²⁰ California Air Resources Board. December 20, 2018. <https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm>.

- Restrict non-essential diesel engine idle time to not more than five consecutive minutes or another time-frame as allowed by the California Code of Regulations, Title 13 section 2485 - CARB's Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling. For any vehicle delivery that is expected to take longer than five minutes, each project applicant, project sponsor, or public agency will require the vehicle's operator to shut off the engine. Notify the vendors of these idling requirements at the time that the purchase order is issued and again when vehicles enter the gates of the facility. To further ensure that drivers and operators understand the idling requirement, include the idling requirement in the training materials for drivers, operators, and vendors, post signs at the entry of the construction site and throughout the Proposed Project site stating that idling longer than five minutes is not permitted.

Responsible Agency, Permits, and Compliance with South Coast AQMD Rules

5. Implementation of the Proposed Project may require permits from South Coast AQMD. If operation of the Proposed Project will involve the use of stationary diesel-fueled internal combustion or compression engines (i.e., generators or firefighting equipment), South Coast AQMD Rule 1470 – Requirement for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines²¹ and South Coast AQMD Rule Series 1146 – Emissions of Oxides of Nitrogen from Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters²², including Rule 1146.1 – Emissions of Oxides of Nitrogen from Small Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters²³ and Rule 1146.2 – Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers and Process Heaters²⁴ would apply and should be discussed in the Air Quality Section of the Final EIR. Therefore, South Coast AQMD staff recommends that the Lead Agency consult with South Coast AQMD Permitting and Engineering staff as early as feasible to determine permit requirements and any applicable rules and regulations that should be discussed in the CEQA document for the Proposed Project. Additionally, in the event that the Proposed Project will use new stationary equipment that requires a permit from South Coast AQMD, the Lead Agency should identify South Coast AQMD as a Responsible Agency for the Proposed Project in the Final EIR. Questions on permits and applicable South Coast AQMD rules can be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385. For more general information on permits, please visit South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>.

²¹ South Coast AQMD. Rule 1470 – Requirement for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf>.

²² South Coast AQMD. Rule 1146 – Emissions of Oxides of Nitrogen from Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1146.pdf>.

²³ South Coast AQMD. Rule 1146.1 – Emissions of Oxides of Nitrogen from Small Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1146-1.pdf>.

²⁴ South Coast AQMD. Rule 1146.2 – Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers and Process Heaters. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1146-2.pdf>.