



## Memorandum

Date: July 19, 2016

To: Gordon Mize, SCAQMD

CC: Mika Klein, Mt. SAC  
Sid Lindmark, Sid Lindmark and Associates

From: Fred Greve, Greve & Associates

Subject: Preliminary Responses to Comments Made on Mt.SAC EIRs

Please see our responses to your comments made on the Mt. San Antonio College EIRs.

6-4.1 *"Could the CalEEMod run output sheets for Scenario 1A be sent to me please? I have the output sheets for the first scenario (Scenario 1). I want to also look at the modeling inputs for both, if I could. The SCAQMD staff does recognize surrogate analyses but the caution is that a variation of a project (an increase in the amount of equipment used, soil disturbance, a decrease in the amount of time to building the project, etc., causes SCAQMD staff to compare the project description of the surrogate analysis with a project description that might be different to see if the project analysis varies from the assumptions from the surrogate".*

*Response to 6.4.1* The comment relates to the CalEEMod output sheets included in the Appendices for CEQA Thresholds and Procedures for Air Quality (Report #15-116A) prepared by Greve & Associates, dated December 7, 2015. The comment is not a comment on the Draft EIR. The report provides the technical basis for establishing the District's threshold for air quality for construction projects. Scenario 1A included no export of earth from a 3-acre site and Scenario 1 included earth export of 10,000 cubic yards. The CalEEMod output sheets for Scenario 1A were forwarded to the respondent, as well as the input files for Scenario 1 and 1A.

6-4.2 *"In addition, the SCAQMD periodically updates the analysis tools used to estimate project air quality impacts. This is done so that recognized emission estimate tools include*

*more current emission factors from more recent fleet averages. For example, the SCAQMD is likely to release CalEEMod 2016 later this year replacing CalEEMod 2013. In practice, over the years, if an analysis is older, the SCAQMD staff might recommend re-analyzing the project's potential emission impacts using the more current analysis tools".*

*Response to 6.4.2* When CalEEMod is updated, the analysis used for the Thresholds of Significance will also be updated. However, it is unlikely that the update will result in a more stringent acreage or square footage requirement since the emission factors used in CalEEMod for vehicles and construction equipment generally decline in future years. Therefore the current CalEEMod analysis will likely remain to be an appropriate analysis for thresholds for future projects. SCAQMD will receive copies for review and comment whenever the current District's Thresholds of Significance are updated.

*6-4.3 "I see a CO hotspots analysis for the additional vehicle trips estimated for the proposed Olympic Trials activities but no actual emission estimates in the DSEIR or the associated air study. The proposed two week activity projects a total attendance of 112,000 people (20,000 daily, page 415). Were the emissions from the vehicles, shuttle buses (should identify how the vehicles are fueled, etc. included in the analyses? If so, I need to see the emissions as well as the methodologies used, emission factors, equations, etc., as part of our review".*

*Response to 6.4.3* Appendix C1 (pp. 18-20) includes the air quality analysis for the 2015 FMPU and for the Olympic Trials. Table 11 (buildout of the 2015 FMPU) indicates all of the intersection volumes are well below the intersection volumes used in the 2005 SCAB CO Redesignation Request, which established the CO concentrations for specific intersection volumes. This analysis is also included on pages 166-167 of the DSEIR. No additional CalEEMod hotspot analysis is required for the 2015 FMPU. Table 12 (Olympic Trials) in Appendix C1 estimated the intersection volumes for the Olympic Trials based on parking management plans A and B. Again, all of the intersection volumes associated with hosting the Olympic Trials were below the volumes used in the Redesignation Request. Therefore, the impact of buildout of the 2015 FMPU or the impact of hosting the 2020 Olympic Trials does not result in significant hotspots at area intersections.

*6-4.4 "Also, since the event could occur with students, faculty and administrative staff on campus, the peak day analysis (worst-case) should include emissions from those sources plus the vehicle emissions added during the eight days of Olympic Trials, unless the DSEIR precludes the overlap of the summer session activities with the Olympic Trials".*

*Response to 6.4.4* The possibility of hosting the Olympic Trials when classes are in session is remote. The 2020 class schedule is subject to legal agreements with the faculty, and those agreements have not been completed to date. However, all planning efforts for hosting the Trials is predicated on classes not being in session if the District hosts the Trials.