

SENT VIA USPS AND E-MAIL:

September 1, 2017

facilitiesplanning@mtsac.edu

Rebecca Mitchell, Manager
Facilities Planning & Management
Mt. San Antonio College
1100 North Grand Avenue
Walnut, CA 91789-1399

**Draft Environmental Impact Report (EIR) for the Proposed
Mt. San Antonio College West Parcel Solar Project (SCH 2002041161)**

The South Coast Air Quality Management District (SCAQMD) 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.

2016 Air Quality Management Plan

On March 3, 2017, the SCAQMD's Governing Board adopted the 2016 Air Quality Management Plan (2016 AQMP), which was later approved by the California Air Resources Board of Directors on March 23rd. The 2016 AQMP¹ is a regional blueprint for achieving air quality standards and healthful air in the South Coast Air Basin (Basin). Built upon the progress in implementing the 2007 and 2012 AQMPs, the 2016 AQMP provides a regional perspective on air quality and lays out the challenges facing the Basin. The most significant air quality challenge in the Basin is to achieve an additional 45 percent reduction in nitrogen oxide (NO_x) emissions in 2023 and an additional 55 percent NO_x reduction beyond 2031 levels for ozone attainment.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to construct a 2.2-megawatt solar panel system (Proposed Project). Approximately 17.25 acres will be graded during construction, and a total of 139,000 cubic yards of soil will be imported. The Proposed Project is bounded by a wildlife sanctuary to the north and east, and residential uses to the south and west.

Air Quality Analysis

In the Air Quality Section, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared them to SCAQMD's regional and localized air quality CEQA significance thresholds. The Lead Agency found that the Proposed Project's air quality impacts would be less than significant after incorporating Mitigation Measure (MM) AQ-1 through MM AQ-11². Based on a review of the modeling output³, SCAQMD staff found that U.S. EPA Certified Tier 4 was used to calculate the emissions from off-road construction equipment as substantial evidence to support the finding that those emissions would not exceed SCAQMD's air quality CEQA significance thresholds for construction. To be consistent with the air quality modeling assumption, SCAQMD staff recommends that the Lead Agency revise MM AQ-02 as follows.

¹ SCAQMD. March 3, 2017. *2016 Air Quality Management Plan*. Accessed at: <http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan>.

² Draft EIR. Section 3.2, *Air Quality*. Pages 54.

³ *Ibid*. Volume 2: Appendices SCH 2002041161. Truck Haul Plan (Report #17-041a). Appendix, CalEEMod Output. Version: CalEEMod.2016.3.1. Run on 7/19/2017. Page 688.

MM AQ-02. Project construction contracts shall prohibit vehicle and engine idling in excess of five (5) minutes and ensure that all off-road equipment is compliant with the CARB's in-use off-road diesel vehicle regulations and SCAQMD Rule 1186 and 1186.1 certified street sweepers or roadway washing trucks, and all internal combustion engines/construction equipment operating on the project site shall meet EPA Certified Tier ~~42~~ emissions standards, ~~or higher according to the adopted project start date requirements.~~

Additional Recommended Mitigation Measure for Air Quality

CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant impacts. As described above, achieving NOx emission reductions in a timely manner is critical to attaining the National Ambient Air Quality Standard (NAAQS) for ozone before the 2023 and 2031 deadlines. SCAQMD is committed to attain the ozone NAAQS as expeditiously as practicable. To further reduce NOx emissions during construction, SCAQMD staff recommends incorporating the following on-road mobile-source truck related mitigation measure in the Final EIR. For more information on potential mitigation measures as guidance to the Lead Agency, please visit SCAQMD's CEQA Air Quality Handbook website⁴.

Recommended MM AQ. Require the use of 2010 and newer haul trucks (e.g., material delivery trucks and soil import/export). In the event that that 2010 model year or newer diesel haul trucks cannot be obtained, provide documentation as information becomes available and use trucks that meet EPA 2007 model year NOx emissions requirements¹, at a minimum. Additionally, consider other measures such as incentives, phase-in schedules for clean trucks, etc.

Pursuant to the California Public Resources Code Section 21092.5 and CEQA Guidelines Section 15088, SCAQMD staff requests that the Lead Agency provide SCAQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. Please contact Ryan Bañuelos, Air Quality Specialist, CEQA Section, at (909) 396-3479 if you have any questions regarding these comments.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS:JC:RB
LAC170728-02
Control Number

⁴ South Coast Air Quality Management District. <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.