



# South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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**Draft Subsequent Program/Project Environmental Impact Report (DSEIR) for the Proposed Mt. San Antonio College 2015 Facilities Master Plan Update and Physical Education Projects (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 CEQA document.

The Lead Agency proposes new development including 1) a redesign of the athletic facilities south Temple Avenue and east of Bonita Avenue; 2) demolition of the existing stadium and construction of a new stadium at the same location; 3) relocation of the Public Transportation Center; 4) a new pedestrian bridge over Temple Avenue; and other improvements. This new development is part of the 2015 Facilities Master Plan Update (FMPU) for educational programs based on a current enrollment of 35,986 students (from the 2014-2015 fall enrollment) and approximately 1,556,400 gross square feet (gsf) of facilities on campus in August 2015. The proposed development addresses a projected fall student enrollment increase from the current enrollment of approximately 3,745 students in academic year 2020-21 (to 39,731 students) and an increase of 7,153 students (to 43,139 students) from the current enrollment in academic year 2025-26. The proposed FMPU will result in a net increase of approximately 425,900 gsf in 2020 and 752,200 in 2025. The DSEIR addresses potential impacts to make the prior 2002-2012 documentation adequate for the current project and projected student enrollments that update the previously certified Final Program EIR (SCH #2002041161), the latest certified in December 2013.

The Lead Agency also seeks comments on using surrogate analyses for projects that estimated regional and localized significance thresholds emission impacts using the California Emissions Estimator Model (CalEEMod land use model) based on two hypothetical project description scenarios.<sup>1</sup> The Lead Agency desires to use these analyses for CEQA projects only at the Mt. SAC site as a screening tool to determine if future projects similar or smaller in scope can be used for CEQA air quality purposes (regional and localized significance thresholds). Further, Tools used to estimate project impacts are constantly being updated. For example, CalEEMod 2016 is set to be released as the recommended version to be used for project analyses later this year replacing CalEEMod 2013. The SCAQMD staff recommends that over time, this analysis

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<sup>1</sup> Revised Draft 2016 CEQA Thresholds of Significance Memorandum (April 28, 2016), "CEQA Thresholds and Procedures for Air Quality (Report #15-116A)", Greve & Associates, LLC, December 7, 2015.

might need to be updated with a more current version of the land use model to ensure that the estimated emissions reflect more current emission factors and other relevant information.

Lastly, the Lead Agency includes hosting of the 2020 U.S. Track & Field Olympic Trials at the project site that could include an estimated 20,000 daily visitors for 8-10 days during the Summer Term (around July-August). In the traffic analysis, approximately 12,000 average daily trips (ADT) area trips reduced by the use of a shuttle system by about 3,600 ADT and vehicle miles traveled (approximately 14,400 VMT) were estimated for the Olympic Trials.<sup>2</sup> Since the proposed Olympic Trials may or may not overlap with the Summer Term (students attending classes, faculty and administrative staff present, etc.), the SCAQMD staff recommends that the Final SEIR include peak daily regional and localized emission estimates from the Olympic Trials to compare to applicable thresholds. If the change in these emissions impacts from the baseline emissions exceeds the SCAQMD recommended operational thresholds of significance, mitigation should be incorporated into the project description and air quality analyses, as applicable, to reduce those impacts. Mitigation could include having parking staff to direct vehicles to parking spaces quickly to avoid unnecessary operations or idling in the venue parking lots, separate entrances and exits including routes in and out of the venue sites for visiting passenger cars and special shuttles, use of clean fuel shuttles, and restrictions to tailgate parties (if air quality is predicted to be Unhealthy for Sensitive Groups<sup>3</sup>).

Pursuant to Public Resources Code Section 21092.5, SCAQMD staff requests that the Lead Agency provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final SEIR. Further, staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist, at (909) 396-3302, if you have any questions regarding the enclosed comments.

Sincerely,

*Jillian Wong*

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JW:GM

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<sup>2</sup> DEIR, Section 3.11 Olympic Track & Field Trials Starting on Page 415 (2020 Olympic T & F Trials Focused Traffic Study by Iteris, Inc., April 15, 2016).

<sup>3</sup> <http://www.aqmd.gov/> See Air Quality Index for current reading. To sign up for SCAQMD Air Quality Alerts, see <http://aqmd.enviroflash.info/>