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## CITY OF WALNUT

August 9, 2017

### VIA EMAIL & HAND DELIVERY

Board of Trustees  
Mount San Antonio College  
1100 North Grand Avenue  
Walnut, CA 91789

**RE: Comments on the Response to Public Comments on the Draft SEIR for the Mt. San Antonio College Physical Education Project (PEP) (Phase 1, 2)**

Dear Members of the Board of Trustees:

The City of Walnut (the "City") has reviewed the District's Responses to the City's comments to the 2017 Draft Subsequent Project EIR to 2015 Facilities Master Plan Update and Physical Education Projects Final Program/Project EIR to Final Program EIR (SCH 2002041161) (the "2017 SEIR"). On the basis of our review, the 2017 SEIR presented to the District for certification tonight fails to satisfy the requirements of the California Environmental Quality Act (Pub. Res. Code §§ 21000, et seq.), and the State of California Guidelines for the California Environmental Quality Act ("Guidelines")(14 Cal. Code Regs. §§15000 et seq.) ("CEQA"). The City urges the District not to certify the 2017 SEIR. Instead the District should correct the deficiencies and recirculate the 2017 SEIR as prescribed by CEQA Guidelines Section 15088.5.

The Responses to Comments do not resolve the City's main concerns with the adequacy of the 2017 SEIR, including: (1) its excessive reliance upon 2015 FMPU/PEP EIR (the "2015 EIR") and other CEQA documents, (2) the change in baseline since the NOP was published, and (3) the effect of the demolition of the Stadium on the feasibility of the alternatives. The 2017 SEIR continues the District's pattern of practice of providing unclear and confusing analysis with excessive reliance on prior CEQA documentation that fails to adequately inform the public about the potential, significant project-level environmental impacts.

**Excessive Reliance on Prior CEQA Documents.** Like its 2015 EIR predecessor, the 2017 SEIR is described as a "unique" combination of Program EIR, Subsequent EIR and Project EIR in a single document. The 2017 SEIR falls short of adequately meeting the purposes of each of these three different types of EIRs as described in CEQA Guidelines Sections 15168, 15162, and 15161. Response to Comment 4.1.4 mischaracterizes the City's comment to the 2017 SEIR as "too extensive... and beyond their comprehension", and then defends its position as to the adequacy of the 2017 SEIR by referencing updated information for traffic, biological resources, noise, and air quality baseline information. However, the information provided in the 2017 SEIR is not extensive and fails to provide sufficient project-level information and analysis. In tiering and streamlining the CEQA review, the

document is overly selective and focused in its reference to the 2015 EIR and series of EIRs dating back to 2008.

As you know, the City has a pending CEQA action challenging the 2015 EIR. The City considered the District request to dismiss that CEQA action based upon the District's acknowledgement that the 2015 EIR was defective and unreliable and that the 2017 SEIR was prepared to correct those deficiencies and comply with the Judgment and Writ of Mandate recently issued in connection with the proposed West Parcel Solar Project litigation. Now, with its excessive reliance upon the defective 2015 EIR in its responses to the City's comments to the 2017 SEIR, the District has built a "house of cards" with a faulty foundation that perpetuates the very pattern and practice of environmental clearance that Judge Chalfant held was a violation of CEQA.

**Environmental and Project Baseline.** The 2017 SEIR fails to establish a current, stable environmental baseline for purposes of identifying significant impacts. The Response to Comment 4.1.2 states that the baseline was established in 2016 when the 2015 EIR was certified and was re-examined in detail when the NOP for the 2017 SEIR was issued in May. Additionally, Response to Comment 4.1.2 states that there is little difference between a baseline that includes the empty facilities and a baseline with the facilities removed. Response to Comment R1 states that the demolition of the Stadium began in April 2017, and significant grading has not occurred on the site since the 2015 EIR was certified. This statement is contradictory. The Response to Comments R1 also states that there were no significant changes between the certification of the 2015 EIR and the issuance of the NOP in May 2017. Although the baseline for an EIR is typically established under CEQA to coincide with issuance of the NOP, the conditions at the project site have changed substantially with the demolition of the stadium after both of these NOPs were published. The demolition of the Stadium began in April 2017, prior to the issuance of the NOP for the 2017 SEIR in May. The District contends that there was no change in baseline conditions, but does not discuss the demolition of the Stadium and grading of the site, which is an obvious change in baseline. Therefore, the comparison of the baseline conditions in May 2017 and the baseline conditions in January is no longer accurate or valid. With the 2017 SEIR, the baseline should be existing site conditions recognizing the demolition of the Stadium.

**Alternatives Analysis.** The Stadium has been recently demolished. This means that two of the three alternatives (No Project and Alternative 1) are no longer feasible alternatives. Moreover, the June 29, 2017 edition of the Los Angeles Times reports the official announcement that Mt. SAC will host the 2020 Olympic track trials at the proposed athletic facilities. In effect, this decision removes Alternative 2 as a feasible alternative. Therefore, the final EIR does not consider any feasible alternatives, including potentially Environmentally Superior Alternatives and the No Project Alternative, as required by CEQA. The Response to Comment 4.1.1 states that the No Project Alternative is explicitly rejected in the discussion on page 116 of the Draft EIR. However, Response to Comment R56 states that the No Project Alternative remains a valid alternative even though the stadium has been demolished. Additionally, Response to Comment 4.1.2 states that there is little difference between a baseline that includes the empty facilities and a baseline with the facilities removed. However, if the stadium has been demolished, then the No Project Alternative cannot be selected.

Additionally, Response to Comment 4.1.1 states that the Olympic trials are currently scheduled to take place June 19-28, 2020. This conflicts with the Response to Comment R56, which states that the preliminary application to host the 2020 Olympic Trials has been approved, and it is not assured that the District will hold this event; Alternative 2 remains a feasible alternative because it does not further development on the stadium site. In fact, development (demolition and grading) on the stadium

site has already begun. If the 2020 Olympic Trials have been scheduled at Mt. SAC, and development has already commenced to support this activity, then Alternative 2 is no longer feasible.

In an effort to clarify the District's response as to the viability of Alternative 2 and the status of the 2020 Olympic Trials, the City requests that all correspondence between the District and the Olympic Committee be made a part of the record for the Board's hearing to consider certification of the 2017 SEIR. In the event the District declines this request, please regard this letter as a formal request for public records pursuant to the California Public Records Act (Government Code Section 6250 *et seq.*).

The Response to Comment R56 further states that the City's original comment did not specify what the "additional viable alternative" is. In fact, the comment stated that a viable alternative is one that reduces impacts on surrounding roadways and land use is needed, as well as a No Project Alternative that reflects continuation of current conditions (e.g., no stadium on the campus).

Other concerns with the adequacy of the 2017 SEIR are the following:

- **Comments on the Technical Studies Prepared for the 2015 EIR.** Beginning on page 14 of the Responses to Comment document, the District states that comments on previous studies are appropriate only if new significant environmental issues are identified or the comments are on material in the current EIR that is considered less than significant. The District relies on previous responses to comments on these technical studies, and does not provide responses in this document. However, the 2017 SEIR relies heavily on previous technical studies. Because the District is relying on these studies for their findings for the current 2017 SEIR, including the project level PEP (Phase 1, 2) environmental review, responses to the inadequacies in these technical studies are required.
- **Project Objectives.** The purpose of an alternatives analysis is to determine whether there is an environmentally superior alternative that will meet most of the Project's objectives. Our previous comments requested a complete list of Project Objectives for the PEP (Phases 1, 2), as well as an analysis of whether the alternatives analyzed in the EIR would "feasibly obtain most of the basic objectives for the project." The Response to Comment 4.1.1 states that the PEP project objectives are stated in Section 2.3 and Table 2.2 of this EIR, as well as in the NOP and NOC. Section 2.3 and Table 2.2 of the EIR contain descriptions and lists of project features such as building square footage, landscaping, athletic facilities, parking, etc. These project features are not project objectives. The Alternatives Analysis in Section 7 of the 2017 SEIR refers to concepts such as facility growth, expansion of educational programs, and District educational objectives from the Mt. SAC Educational Master Plan when evaluating the alternatives. A comprehensive list of project objectives for the PEP (Phases 1, 2) Project must be included in the EIR to allow for meaningful analysis of alternatives.
- **Traffic.** Response to Comment 4.1.1 states that the primary issue addressed in the 2017 SEIR is the project impact on two intersections in the City of Pomona. However, this document is also identified as a program EIR. As such, the scope of the document extends beyond the narrow focus on two intersections in Pomona.
- **Land Use/Zoning.** Response to Comment 4.1.1 states that, because the District is not subject to the City's zoning, further analysis of Project alternatives on zoning is not

relevant. However, conflicts with the City's zoning code are identified as a significant, unavoidable impact. The Project alternatives must examine alternatives that could reduce the impact from inconsistencies with the City's General Plan, zoning, and the PEP (Phases 1, 2) project. Further, Response to Comment R8 ignores the fact that, per Section 6.0 of the 2017 SEIR, a Statement of Overriding Considerations is needed for the significant and unavoidable conflict with applicable land use plans (the City's zoning ordinance).

- **Construction Impacts.** The City requested additional project-level construction information to adequately assess traffic, noise and air quality impacts to surrounding public roadways and residential neighborhoods. Response to Comment 4.1.3 refers to the program EIR. However, project-level information needed to provide an adequate project-level assessment of impacts for construction traffic, grading and haul, air quality, noise and other issues.
- **Lack of Comprehensive Summary of Impacts and Mitigation Measures.** The segmentation and partial disclosure of Impacts and Mitigation Measures in Table 1.2 and throughout the 2017 SEIR frustrates a clear understanding of all environmental impacts and proposed Mitigation Measures for the PEP (Phases 1, 2). Response to Comment R7 states that a comparison of Table 1.2 and Appendix H is required. A consolidated summary table is needed that identifies all impacts and proposed mitigation measures. Again, this deficiency in the 2017 SEIR does not meet the basic purpose of CEQA to inform decision makers and the public (CEQA Guidelines Section 15002).
- **Limited Geographic Scope of Cumulative Impact Analysis.** The 2017 SEIR assertion that the geographical area for analysis of impacts other than traffic (i.e. aesthetics, air quality, biological resources, cultural resources, energy, geology/soils, greenhouse gases, historical resources, parking, public services, water quality, etc.) is limited to the College campus is sweeping and made without supporting evidence. The campus is surrounded by residential areas representing sensitive local receptors for air quality, noise, visual impacts on the north, west and south. Air quality impacts are regional in scope. The Response to Comment 4.1.6 does not provide any additional substantial evidence to support the conclusion that the Project's contribution to cumulative traffic, air quality, greenhouse gas, and noise do not extend beyond the campus boundaries.
- **Tribal Cultural Resources.** The statement that the PEP site has no established cultural tribal value is apparently based on Native American consultation conducted in 2014. However, to properly address Item e, there must be evidence of compliance with AB 52, a formal consultation process requiring notification to Native American tribes who have requested consultation under AB 52. Since the NOP for the 2017 SEIR was filed in April 2017 (2017 EIR Appendix A), the AB 52 process is required. There is no evidence of compliance with AB 52. The Response to Comments 4.1.8 states that the Tongva Nation and the Kizh Tribal Nation were contacted during the preparation of the 2015 EIR and that the District is currently completing consultation with tribes who request AB 52 notices; however, no discussion of the AB 52 notification and consultation process has been provided. How will the results of the consultation be reported? AB 52 established Tribal Cultural Resources as a resource that must be evaluated separately in a CEQA document, and that the tribes themselves are experts in determining if a resource is present and would be affected by the project. The outreach conducted in 2016 was part



of the CEQA public review process which, as noted by the District, is a separate process from AB 52 consultation. Both Native American groups identified the potential for Tribal Cultural Resources within the campus (2015 EIR Appendices and Volume 3), although it is difficult to tell from the provided information if there may be Tribal Cultural Resources that could be affected by the PEP Project. Both groups requested that a tribal monitor be present during certain ground disturbing activities. However, neither the Mitigation Monitoring Program for the 2015 EIR nor the 2017 SEIR require tribal monitors, and an evaluation is not provided regarding why the tribal monitors are not required. Response to Comment R37 states that the evaluation of tribal cultural resources is provided in Section 5C on page 92; however, this section merely provides a conclusory statement that no tribal cultural resources are at the PEP site, without supporting substantial information.

- **Draft 2017 Mitigation Monitoring Plan.** This provides a list of mitigation measures only. Assurance of the ability to implement and enforce these measures is needed. Timing of the mitigation measures should be included.
- **Eligibility of Cultural Resources.** Response to Comments 7 (from ASM's letter) and Response to Comments 54. Cultural resources are determined to be eligible or not eligible for the California Register of Historical Resources (CRHR) by the CEQA Lead Agency (the District) when they certify an EIR. The resources became eligible for the CRHR and became Historical Resources under CEQA when the 2015 EIR was certified by the District. SHPO does not make CRHR eligibility determinations for resources subject to CEQA. They only concur (or not) with determinations of eligibility for the National Register of Historic Places made by federal agencies for projects subject to Section 106 of the National Historic Preservation Act.
- **Noise and Air Quality/Greenhouse Gases.** Attached are specific technical comments from our technical review team that separately detail issues and comments for Noise and Air Quality/Greenhouse Gases (Kunzman Associates).

Sincerely,



Barbara Leibold, City Attorney

cc: Walnut City Council  
Robert M. Wishner, City Manager  
Tom Weiner, Community Development Director

Attachments: Noise Review  
Air Quality Review



# KUNZMAN ASSOCIATES, INC.

OVER 40 YEARS OF EXCELLENT SERVICE

August 7, 2017

Ms. Anne Surdzial, Director of CEQA/NEPA Services  
ECORP CONSULTING, INC.  
215 North Fifth Street  
Redlands, CA 92374

Dear Ms. Surdzial:

## INTRODUCTION

The firm of Kunzman Associates, Inc. is pleased to provide this 2<sup>nd</sup> review for the Mt. SAC 2015 Facilities Master Plan Update (FMPU) and Physics Education Projects Draft Subsequent Project EIR (hereinafter the Draft SEIR). Kunzman Associates, Inc. received the responses from the technical consultant (Greve & Associates, LLC dated July 13, 2017). The following outlines the overall summary of our 2<sup>nd</sup> review responses provided.

## COMMENT 1

The technical noise study provides limited construction noise assumptions and bases the evaluation on the L<sub>max</sub> and inverse square law assumptions. The analysis fails to evaluate potential construction equipment used and instead defers back to the fact that the equipment is unknown. However, the air quality study/greenhouse gas study provides some general construction equipment used for these types of projects. When multiple pieces of equipment are used there is a potential for L<sub>max</sub> to constructively interfere. The construction noise impacts may be understated due to the over simplification of the noise construction evaluation and the lax construction noise thresholds imposed.

## COMMENT 2

The calculation outputs and the methodology used to evaluate both construction and stadium operational noise are difficult to follow. The technical study assumes a drop-off rate of 6dB per doubling of distance (inverse square law) however this assumption maybe over simplifying the both construction and stadium noise impacts.

Ms. Anne Surdzial, Director of CEQA/NEPA Services  
ECORP CONSULTING, INC.  
August 7, 2017

**CONCLUSION**

It has been a pleasure to serve your needs on this project. Should you have any questions or if we can be of further assistance, please do not hesitate to call at (714) 973-8383.

Respectfully submitted,


KUNZMAN ASSOCIATES, INC.



Mike Dickerson, INCE  
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Principal



# KUNZMAN ASSOCIATES, INC.

OVER 40 YEARS OF EXCELLENT SERVICE

August 8, 2017

Ms. Anne Surdzial, Director of CEQA/NEPA Services  
ECORP CONSULTING, INC.  
215 North Fifth Street  
Redlands, CA 92374

Dear Ms. Surdzial:

## INTRODUCTION

The firm of Kunzman Associates, Inc. is pleased to provide this second set of comments regarding the Responses to Comments from Fred Greve, Greve & Associates, LLC, dated July 17, 2017 for the air quality impact analysis peer review of the Mt. San Antonio College Facilities Master Plan Update (FMPU) and Physical Education Projects Draft Subsequent Project EIR (SEIR). Kunzman Associates, Inc. has reviewed the responses and makes the following comments:

The responses were generally considered to be acceptable, with the exception of those comments detailed below:

## ORIGINAL COMMENT 2

According to the CalEEMod output in the appendices, the AQR analyzed existing emissions from a 35,986 student junior college on 420 acres. Those daily criteria pollutant emissions were reported in Table 3 on page 10 of the AQR, and also Table 3.3.4 on page 149 of the Draft SEIR.

The CalEEMod output (all winter outputs, no summer emissions provided) of the AQR also showed that analysis was performed for the following:

1. *FMPU Buildout including demolition and excluding PEP.* This analysis was done for 259.02 TSF of junior college land use on 5.95 acres, operational in 2025, with construction from 1/1/2017 to 3/23/2018.
2. *FMPU - Building G construction and demolition.* This analysis was done for 50 TSF of junior college land use on 5 acres, operational in 2021, with construction from 1/1/2019 to 2/24/2020.
3. *FMPU - Building A construction (No demolition).* This analysis was done for 50 TSF on 1.15 acres, operational in 2025, with construction from 1/1/2025 to 12/11/2025 (construction output includes demolition, even though it should not [according to the title]).
4. *FMPU - 2020.* This analysis is for a 39,731 student junior college land use (1,734,347.04 of floor surface area) on 39.82 acres. Operational in 2020. No construction emissions report is included with this output, so it is assumed that this CalEEMod run represents operational emissions only.



Ms. Anne Surdzial, Director of CEQA/NEPA Services  
ECORP CONSULTING, INC.  
August 8, 2017

5. *FMPU - 2025*. This analysis is for a 46,139 student junior college land use (1,883,113.86 of floor surface area) on 43.23 acres. Operational in 2025. Again no construction emissions report, so it is assumed that this CalEEMod run represents operational emissions only.
6. *PEP - Phase 1 - Construction Only*. This analysis is for a 91.73 TSF junior college land use on 2.11 acres, general light industry of 79.40 TSF on 1.82 acres, 174.43 TSF of other non-asphalt surfaces on 4 acres, 107.57 TSF of parking lot land uses on 2.47 acres, and 21.80 acres of city park land uses, operational in 2019, with construction from 10-3-2016 to 8-16-2018.
7. *PEP - Phase 2 - Construction Only*. This analysis is for a 117.90 TSF junior college land use on 2.71 acres, enclosed parking structure (to simulate pool area) of 23.09 TSF on 0.53 acres, and 68.81 TSF of other non-asphalt surfaces (to simulated tennis courts) on 1.58 acres, operational in 2021, with construction from 2/1/18 to 9/28/2020.

On page 12 of the AQR under subheading 2.2.1.1 Overall Construction Emissions, it states that the "long-term buildout of the 2015 FMPU will result in new construction of 454,485 square feet (including PEP). To make room for some of the new construction, demolition of some existing buildings is necessary. The FMPU indicates that approximately 122,976 square feet will be demolished." When the square footage for "FMPU Buildout including demolition and excluding PEP" for the junior college land use of 259.02 TSF is added to PEP Phase 1 JC land use of 91.73 TSF and PEP Phase 2 JC land use of 117.90 TSF, the total is 468,650 SF, which is a smaller amount from the "500,000 gross square feet" detailed in the project description, and a larger amount from the "454,485 square feet (including PEP)" given both in the report and above. Page 146 of the Draft SEIR, third paragraph down, has a different number again (454,906 SF). Which is the correct square footage? The largest square footage possible needs to be analyzed to calculate the project's potential "worst-case" construction-related impacts.

The analysis needs to be revised with the correct square footage using the latest version of CalEEMod (version 2016.3.1) and the findings within the Draft SEIR should be revised as needed, with the proper results.

#### **GREVE RESPONSE TO ORIGINAL COMMENT 2**

The winter CalEEMod and summer CalEEMod are nearly identical, and it didn't seem necessary to include the summer runs.

Any confusion regarding individual or total building square footages in the Draft EIR is related to these factors: (1) The initial analysis is based on information available when the NOP was issued, (2) CalEEMOD may generate emissions based on either land use or square footages. In some cases, land use acreage was used and the total square footage is derived internally by CalEEMod, and (3) the square footages projected for buildout of the 2015 FMPU/PEP in 2020 and 2025, along with demolition estimates, was included in Appendix K1 of the 2015 FMPU/PEP Draft EIR.

The prior air quality and greenhouse gas analysis remains adequate for the changed project, and the changed project does not alter the enrollment or square footage assumptions used in the 2015 FMPU/PEP EIR. The analysis of two new intersections has no bearing on the prior conclusions for buildout of the 2015 FMPU/PEP, PEP (Phase 1, 2) or other large individual projects analyzed.

## ADDITIONAL COMMENT 2

NOx emissions are generally higher in the winter and VOCs higher in summer. If emissions reported in the AQR were only taken from the summer output, then that fact should be disclosed in the report. If winter emissions were used, then the output should be provided in the appendices for verification of the reported emissions levels.

## ORIGINAL COMMENT 3

Several areas in the CalEEMod output conflict with the information provided in the text of the AQR. For example:

- a) On page 15 of the AQR under the subheading *2.2.1.3 Construction Emissions for Building A*, it states there that Building A will be 167,200 gsf by 2025. Whereas the CalEEMod output shows that the analysis of Building A (No Demolition) is for a 50.00 TSF junior college on 1.15 acres; therefore, emissions for Building A are under-reported and the emissions need to be revised and re-analyzed for inclusion in Tables 8 and 9 of the AQR. Furthermore, according to the output header and the text on page 15, "Demolition will be required to clear the site for Building A, but this was assumed to occur during the construction of Building G." However, demolition was analyzed for this part of the project, and the demolition emissions were reported under the Demolition Activity in Table 8 on page 16 and Table 9 for the LST analysis on page 17 of the AQR. It is unknown how many SF of existing buildings (16, 18, 18, 19 and 21) were analyzed as being demo'd, as there are no details in the report or CalEEMod output regarding what the building square footage is for the buildings being demo'd. Therefore, those details need to be made clear and described in the text of the revised AQR and Draft SEIR.
- b) The CalEEMod Output with the heading PEP - Phase 1 - Construction Only, shows an analysis for a 91.73 TSF junior college land use on 2.11 acres, general light industry of 79.40 TSF on 1.82 acres, 174.43 TSF of other non-asphalt surfaces on 4 acres, 107.57 TSF of parking lot land uses on 2.47 acres, and 21.80 acres of city park land uses. It is unknown what part of PEP Phase 1 is represented by the general light industrial land uses, other non-asphalt surfaces use and the 21.80 acres of City park uses. These details need to be included, in a similar manner as they were for PEP - Phase 2.
- c) On page 13 of the AQR, 1st paragraph, it states "It was also assumed that the overlap between construction phases would be minimal." However, although the construction for the portions of each phase of the FMPU may not overlap, as shown by the construction timing given in the CalEEMod output, portions of the construction FMPU overlap with the construction of the PEP; therefore, those overlapping construction emissions for the FMPU and the PEP need to be added together and compared against the regional daily thresholds. Furthermore, as shown above (taken from the CalEEMod output), PEP phase 1 overlaps with PEP phase 2 in 2018, as construction of PEP phase 1 is from 10-3-2016 to 8-16-2018 and construction of PEP phase 2 goes from 2/1/18 to 9/28/2020. Therefore, the overlapping portions of PEP phase 1 and 2 construction should to be added together, then added to the overlapping portion of the FMPU, for a combined total for maximum daily construction emissions that can be compared against daily regional construction thresholds.

### GREVE RESPONSE TO COMMENT 3

- a) The square footage on page 15 is incorrect and should read 50,000 square feet for the Building A. The CalEEMod runs and Tables in the report are correct. The demolition of buildings necessary for the construction of Building A and G, is shown in the CalEEMod outputs as 57,391 square feet of building.

### ADDITIONAL COMMENT 3

- a) The demolition SF does not appear anywhere in the output; therefore, the 57,391 SF detail should be included in the text on page 14 of the AQR and in the text of the AQ section of the DEIR.
- c) SCAQMD thresholds are to be compared to maximum daily emissions, not averages. It is unclear how the values in Table 5 were obtained from the CalEEMod Output. For example, the CalEEMod output shows that for FMPU (Excluding PEP) the total construction emissions for NOx is 78.7212 lbs/day, total construction emissions for PEP Phase 1 is 327.1794 lbs/day, and for PEP Phase 2, the total construction emissions are 150.2698 lbs/day; these all add up to a grand total of 556.1704 lbs/day. The only emissions that are under SCAQMD thresholds (in Table 5 of the AQR and Table 3.3.9 in the SEIR) are the averaged emissions, which were then compared to SCAQMD's mass daily thresholds.

### ORIGINAL COMMENT 4

The values reported in Table 5 on page 13 of the AQR and also Table 3.3.9 on page 156 of the Draft SEIR incorporates flawed methodology. In Table 5, the total emissions for FMPU (excluding PEP), PEP phase and PEP phase 2 were added together and the values shown in the Total Construction row. Those emissions were then divided by either 5 years or 10 years, then those emissions were then compared to the SCAQMD daily construction emissions thresholds. This methodology is incorrect, as the SCAQMD requires that the project's maximum daily emissions be compared to the mass daily significance thresholds.

It is understandable that, for a Master Plan, precise construction timing may not available; however, the most conservative, worst-case scenario should be ascertained and analyzed, then those resultant emissions can then be compared to the mass daily significance thresholds. It is incorrect to average criteria pollutant emissions over the 5 or 10 years of potential project construction to then compare those average values to the thresholds. This type of analysis completely under-estimates the project's maximum daily emissions. The construction activities during the 5 or 10 year duration of construction should be accurately modeled in CalEEMod, using those time frames (as applicable) to the extent feasible.

Construction emissions need to be re-modeled using correct methodology and the latest version of CalEEMod. It is likely that construction-related emissions will be significant. Furthermore, it is unknown whether the construction and operation of the West Parcel Solar (WPS) Project will overlap this project,

Ms. Anne Surdzial, Director of CEQA/NEPA Services  
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August 8, 2017

as details and technical AQ-GHG reports were not available for review. This information would need to be verified and included as part of the cumulative impact review.

#### GREVE RESPONSE TO COMMENT 4

The methodology presented in Section 2.2.1.1 takes analysis of construction emissions for a college Master Plan one step beyond what is normally done. Since no construction schedule is available at the Master Plan stage, construction emissions are often only qualitatively discussed. The methodology in Section 2.2.1.1 looks at a very aggressive 5 year buildout scenario and a more realistic 10 year buildout scenario and examines the daily construction emissions. Using the 5 year construction schedule, we believe, results in a very worst-case estimate of daily construction emissions.

#### ADDITIONAL COMMENT 4

As the draft SEIR is rather a 'unique' combination of Program EIR, Subsequent EIR and Project EIR in a single document, the City should be able to provide an estimate of construction activities for the 5 or 10 year duration of construction, which should then be available for the AQ analyst to use, in order to more accurately analyze construction-based impacts, which can then be used to obtain daily maximum emissions, which can then be accurately compared to the SCAQMD Mass Daily Thresholds.

#### ORIGINAL COMMENT 5

Operational emissions were reported in Table 10 for Existing, Year 2020 and Year 2025. Per the Traffic Impact Study, the project is expected to grow by an additional 3,745 students by 2020 and then by a total of 7,153 students by 2025. As the majority of project-related emissions are sourced from vehicles, and the project will adding 4,606 daily vehicle trips in 2020 and a total of 8,798 vehicle trips by 2025.

The operational analysis needs to be consistent with the project as analyzed in the Iteris Traffic Impact Study, which does not discount any project-related trips by subtracting existing trips. Existing emissions values should only be subtracted from project emissions values if the existing operational portion of the site will no longer be operational (and generating emissions) once the project becomes fully operational in 2025. This is not the case, and the added trips from new students will only increase the overall regional operational emissions sourced from the Mt. SAC campus.

Per SCAQMD recommendations, when measuring project emissions, it is appropriate to include regulatory requirements, such as the federal and state regulations that require vehicles to be more efficient and lower-emitting. However, "the proposed Project's emissions themselves should not be masked by comparing it to an existing condition baseline where air quality is worse than what it will be when the proposed Project is operational<sup>1</sup>" It is appropriate to assume that vehicles will comply with existing regulatory requirements; however their increase in activity and the additional 8,798 trips needs to be accounted for and shouldn't be masked by improvements brought on by those regulations.

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<sup>1</sup> SCAQMD Comment Letter on the Recirculated Draft Environmental Impact Report (RDEIR) for the Proposed General Plan Amendment No. 960: General Plan Update Project, April 3 2015, *available at*: <http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/april/deirno960.pdf?sfvrsn=2>.

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Therefore, the analysis of the project-related operational emissions should be remodeled using 3,745 additional students for year 2025 and a total of 7,153 additional students for 2025 buildout (as detailed in the Traffic Impact Study). Those emissions then need to be compared to the regional mass daily operational thresholds to ascertain whether just the project-related increase in student vehicular traffic volumes exceed SCAQMD operational thresholds.

#### GREVE RESPONSE TO COMMENT 5

CalEEMod allows two approaches for estimating emissions for operations from a college campus. One approach is to base the emission projections on projected student enrollment. The second approach is to use traffic data and other factors for the emission projections. The air quality assessment was necessarily prepared before the traffic analysis was complete and other data for the analysis was not available. Therefore, the approach used was the CalEEMod methodology based on student enrollment. CEQA requires that future cases be compared to existing, and that is exactly what has been done.

#### ADDITIONAL COMMENT 5

It is understandable and allowable to compare the project's emissions to existing emissions; however, to subtract existing emissions from the project's emissions is not correct, as the existing emissions will only be added to by the project, as the project will be adding 8,798 trips above baseline (existing), and those additional project-related emissions need to be accounted for and compared to SCAQMD operational thresholds.

#### CONCLUSION

It has been a pleasure to serve your needs on this project. Should you have any questions or if we can be of further assistance, please do not hesitate to call at (714) 973-8383.

Respectfully submitted,

KUNZMAN ASSOCIATES, INC.



Katie Wilson, M.S.  
Senior Associate

JN 7016b

KUNZMAN ASSOCIATES, INC.



William Kunzman, P.E.  
Principal