



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL AND USPS:

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dsinclair@cityofpasadena.net

David Sinclair, Senior Planner
175 N. Garfield Avenue
Pasadena, CA 91101

Draft Environmental Impact Report (Draft EIR) for the Proposed ArtCenter College of Design Master Plan

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.

Project Description and Air Quality Analysis

The Lead Agency proposes to develop a Master Plan for the ArtCenter College of Design South Campus and Hillside Campus to accommodate the growth of up to 2,500 full-time equivalent students by 2032 (Proposed Project). The Proposed Project would include 475,520 million square feet of new academic facilities, student housing, administrative facilities, parking, and open space. In the Air Quality Section, the Lead Agency quantified the Proposed Project's construction and operational air quality impacts and compared those impacts to SCAQMD's regional and localized air quality CEQA significance thresholds. Based on the analyses, the Lead Agency found that the Proposed Project's operational and construction emissions would be less than the SCAQMD's regional and localized CEQA significance thresholds. SCAQMD staff has concerns regarding air quality analysis and potential overlapping operational and construction emissions. Please see the attachment for more information.

SCAQMD's 2016 Air Quality Management Plan

On March 3, 2017, the SCAQMD's Governing Board adopted the 2016 Air Quality Management Plan (2016 AQMP)¹, which was later approved by the California Air Resources Board on March 23, 2017. Built upon the progress in implementing the 2007 and 2012 AQMPs, the 2016 AQMP provides a regional perspective on air quality and the challenges facing the South Coast Air 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.

As described in the 2016 AQMP, to achieve NO_x emissions 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. The Proposed Project plays an important role in contributing to NO_x and ROG emissions during the overlapping construction and operational phases. Therefore, SCAQMD staff recommends additional mitigation measures to further reduce NO_x and ROG emissions. The attachment also includes comments about the air quality analysis and compliance with SCAQMD rules.

Pursuant to 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. Further, when the Lead Agency

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

makes the finding that the recommended mitigation measures are not feasible, the Lead Agency shall describe the specific reasons for rejecting them in the Final EIR (CEQA Guidelines Section 15091). SCAQMD staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Jack Cheng, Air Quality Specialist, CEQA IGR Section, at (909) 396-2448, if you have any questions regarding the enclosed comments.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment

LS:JC

LAC171026-02

Control Number

ATTACHMENT

Air Quality Analysis – Overlapping Construction and Operational Impacts

1. The Lead Agency did not analyze a scenario where construction emissions overlap with operational emissions. When overlapping construction and operational activities are anticipated and reasonably foreseeable during the CEQA review for the Proposed Project, SCAQMD staff recommends that the Lead Agency identify the overlapping years, combine construction emissions with operational emissions, and compare the combined emissions to SCAQMD's air quality CEQA operational thresholds of significance to determine the level of significance in the Final EIR. In the event that the Lead Agency, after revising the Air Quality analysis, finds that the Proposed Project's air quality impacts would be significant, mitigation measures will be required pursuant to CEQA Guidelines Section 15126.4. For more information on suggested potential mitigation measures as guidance to the Lead Agency, please visit SCAQMD's CEQA Air Quality Handbook website².

Additional Recommended Mitigation Measures

2. CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate these impacts. SCAQMD staff recommends that the Lead Agency incorporate the following mitigation measures in the Final EIR to further reduce emissions, particularly from ROG and NOx. Additional information on potential mitigation measures as guidance to the Lead Agency are available on the SCAQMD CEQA Air Quality Handbook website³.
 - a) All off-road diesel-powered construction equipment shall meet or exceed Tier 4 off-road emissions standards. A copy of the fleet's tier compliance documentation, and CARB or SCAQMD operating permit shall be provided to the Lead Agency at the time of mobilization of each applicable unit of equipment. In the event that all construction equipment cannot meet the Tier 4 engine certification, the Lead Agency must demonstrate through future study with written findings supported by substantial evidence before using other technologies/strategies. Alternative strategies may include, but would not be limited to, reduction in the number and/or horsepower rating of construction equipment, limiting the number of daily construction haul truck trips to and from the Proposed Project, using cleaner vehicle fuel, and/or limiting the number of individual construction project phases occurring simultaneously.
 - b) Require the use of 2010 model year diesel haul trucks that conform to 2010 EPA truck standards or newer diesel haul trucks (e.g., material delivery trucks and soil import/export), and if the Lead Agency determines that 2010 model year or newer diesel haul trucks are not feasible, the Lead Agency shall use trucks that meet EPA 2007 model year NOx emissions requirements, at a minimum.
 - c) Require the use of architectural coatings (no more than 50 grams/liter of VOC) that are in compliance with SCAQMD Rule 1113 – Architectural Coatings.
 - d) Construct or build with materials that do not require painting or use pre-painted construction materials.
 - e) Limit parking supply and unbundle parking costs.

² South Coast Air Quality Management District. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

³ Ibid.

- f) Require that 240-Volt electrical outlets or Level 2 chargers be installed in parking lots that would enable charging of NEVs and/or battery powered vehicles.

Vehicles that can operate at least partially on electricity have the ability to substantially reduce the significant NOx and ROG impacts from this project. It is important to make this electrical infrastructure available when the project is built so that it is ready when this technology becomes commercially available. The cost of installing electrical charging equipment onsite is significantly cheaper if completed when the project is built compared to retrofitting an existing building. Therefore, SCAQMD staff recommends the Lead Agency require the Proposed Project to be constructed with the appropriate infrastructure to facilitate sufficient electric charging for vehicles to plug-in.

- g) Require use of electric lawn mowers and leaf blowers.