



South Coast Air Quality Management District

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Draft Environmental Impact Report (DEIR) for the Proposed North Campus Project at California State University, Los Angeles

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

The Lead Agency proposes new student housing facilities with 1,500 beds; demolition of existing parking lots to develop two new sport and recreation fields (South Fields); and reconstruction of the existing North Field to build a four-to-five level parking structure with approximately 1,650 parking spaces. One of the primary project objectives is to enhance the provision of student housing to help accommodate on-campus housing while creating a sense of place and providing needed sport and recreation facilities for University students, including students living on campus. The proposed project will be constructed in phases. The proposed project is expected to be completed in the Fall of Year 2021.

Localized Significance Thresholds Analysis

Based on the information in the DEIR and a review of aerial maps, the SCAQMD staff found that the construction of the new parking structure would occur less than 500 feet from sensitive receptors (e.g., residences, a child care center, and a high school) that are located north, west and southeast of the new parking structure. However, the DEIR did not evaluate potential localized air quality impacts from construction of the new parking structure. Therefore, the SCAQMD staff recommends that the Lead Agency revise the air quality analysis to include an assessment of potential localized air quality impacts during construction of the new parking structure and disclose the impacts, if any, in the Final EIR. SCAQMD guidance for performing a localized air quality analysis can be found at the SCAQMD website¹. In the event that the Lead Agency concludes, after its analyses, that construction emissions would exceed the SCAQMD daily significance thresholds, the SCAQMD staff has compiled mitigation measures² to be implemented in addition to the measures included in the DEIR starting on page 68.

Compliance with SCAQMD Rule 403(e) and Rule 1403

The proposed project is a large operation (50 acre sites or more of disturbed surface area; or daily earth-moving operations of 3,850 cubic yards or more on three days in any year) in the South Coast Air Basin. The Lead Agency is required to comply with SCAQMD Rule 403(e) – Additional Requirements for Large Operations. The requirements may include, but are not limited to, Large Operation Notification, appropriate signage, additional dust control measures, and employment of a dust control supervisor that

¹ <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>

² <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>

has successfully completed the Dust Control in the South Coast Air Basin training class³. The Final EIR should contain a discussion to demonstrate compliance with SCAQMD Rule 403(e).

Based on a review of the project description in the DEIR, the proposed project would include demolition activities where asbestos could be encountered. Therefore, the Lead agency should discuss and provide additional information in the Final EIR to demonstrate compliance with SCAQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities.

Additional Mitigation Measures

CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant impacts. Pursuant to CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. In the DEIR, the Lead Agency found that emissions from construction would exceed SCAQMD's CEQA regional threshold for NOx. After incorporating mitigation measures⁴, the impact for NOx would remain significant and unavoidable. To further reduce NOx emissions from construction, the SCAQMD staff recommends that the Lead Agency include in the Final EIR additional construction mitigation measures provided below:

1. Include in all construction contracts the requirement to use 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export). In the event that that 2010 model year or newer diesel trucks cannot be obtained, provide documentation as information becomes available and use trucks that meet EPA 2007 model year NOx emissions requirements.⁵
2. Include in all construction contracts the requirement that all off-road diesel-powered construction equipment greater than 50 hp shall meet Tier 4 off-road emission standards at a minimum. In addition, if not already supplied with a factory-equipped diesel particulate filter, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. In addition, construction equipment shall incorporate, where feasible, emissions savings technology such as hybrid drives and specific fuel economy standards. In the event that any equipment required under this mitigation measure is not available, provide documentation as information becomes available. A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit at the time of mobilization of each applicable unit of equipment shall be provided.

More information on mitigation measures as guidance to the Lead Agency are available on the SCAQMD CEQA Air Quality Handbook website at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>⁶.

³ SCAQMD Compliance and Enforcement Staff Contact Information for Rule 403 Large Operations: (909) 396-2608 or by e-mail at dustcontrol@aqmd.gov.

⁴ DEIR, Page 68 – Mitigation Measures and Table S-1 Summary of Environmental Impacts and Mitigation Measures.

⁵ Based on a review of the California Air Resources Board's diesel truck regulations, 2010 model year diesel haul trucks should have already been available and can be obtained in a successful manner for the project construction California Air Resources Board. March 2016. Available at: <http://www.truckload.org/tca/files/ccLibraryFiles/Filename/000000003422/California-Clean-Truck-and-Trailer-Update.pdf> (See slide #23).

⁶ Chapter 11 of the SCAQMD CEQA Air Quality Handbook. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720.

Pursuant to Public Resources Code Section 21092.5, SCAQMD staff requests that the Lead Agency provide SCAQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. 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, CEQA IGR, at (909) 396-3302, if you have any questions regarding the enclosed comments.

Sincerely,

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LS:GM

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