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<u>Draft Environmental Impact Report (Draft EIR) for the Proposed</u> <u>Pomona College 2015 Campus Master Plan</u>

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.

The proposed project consists of a long-range Master Plan for planned future improvements to the Pomona College campus over a period of 15 years. The Master Plan includes the following:

- Enrollment increase of 50 students
- Removal of up to 126,700 gross square feet of existing facilities
- Construction of up to 608,200 gross square feet of new facilities
- Increase of 18 parking spaces
- Various remodeling and campus improvements

According to the Localized Significance Threshold (LST) analysis, only the largest single project was analyzed (Museum of Art – Project 4A). Project 4A will include 4,400 square feet of demolition and 40,000 square feet of new construction. The Lead Agency used the LST mass rate look-up tables for a 5-acre site since the Plan Area measures approximately 140 acres. Since the LST analysis only analyzed on project, the Lead Agency should use the mass look up table suitable for Project 4A; a 1-acre site¹. SCAQMD staff recommends the Lead Agency revise the LST analysis in the Final EIR.

In the event that the Lead Agency determines the proposed project will result in significant localized construction air quality impacts, the SCAQMD staff recommends that the Lead Agency require mitigation to minimize these impacts to a less than significant level. Additional construction-related air quality mitigation measures are available at:

http://www.aqmd.gov/ceqa/handbook/mitigation/MM intro.html

¹ The Localized Significance Threshold (LST) methodology and Mass Rate LST Look Up Table is available at: http://www.aqmd.gov/ceqa/handbook/LST/LST.html

The SCAQMD staff is available to work with the Lead Agency to address these concerns and any other air quality questions that may arise. Please contact Jack Cheng, Air Quality Specialist at (909) 396-2448, if you have any questions regarding these comments. We look forward to reviewing and providing comments for the Final IS/MND associated with this project.

Sincerely,

Jillian Baker

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