



# South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

January 4, 2018

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## **Draft Environmental Impact Report (Draft EIR) for the Proposed City of Hope Campus Plan (Specific Plan – General Plan Amendment 15-01 and Zone Change 15-01)**

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.

### SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to develop a Campus Plan for the City of Hope as a blueprint to guide enhancement and development with the buildout year in 2035 on approximately 116 acres (Proposed Project). The Proposed Project has a maximum development capacity of 1,436,000 square feet of new development with 387,500 square feet of existing structures proposed for demolition. The Proposed Project is generally bound by the Metro Gold line to the north, the Santa Fe Flood Control Basin to the east and south, and residential uses to the west. Construction of the Proposed Project would occur in phases with construction of each subsequent phase beginning at the completion of the previous phase over a period of 18 years from year 2017 to year 2035<sup>1</sup>. Thus, operation of earlier phases would occur in conjunction with construction of later phases.

### SCAQMD Staff's Summary of Air Quality and Health Risk Assessment (HRA) Analyses

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 construction emissions for PM<sub>2.5</sub>, during Phase 1, would be less than significant after incorporating mitigation measure (MM) AQ-1.<sup>2</sup> Additionally, the Lead Agency performed an HRA and found that the Maximum Exposed Individual Resident cancer risk would be 5.1 in one million after incorporating MM AQ-2, which is below SCAQMD's CEQA significance threshold of 10 in one million for cancer risk.<sup>3</sup> SCAQMD staff has comments regarding the Air Quality Analysis. Please see the attachment for more information. The attachment also includes comments on existing air quality mitigation measure, additional recommended mitigation measure, and SCAQMD Rule 403(e).

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. SCAQMD staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Ryan Bañuelos, Air Quality Specialist, CEQA IGR Section, at (909) 396-3479, if you have any questions regarding the enclosed comments.

<sup>1</sup> Draft EIR, Section 5.2 *Air Quality*, Pages 5.2-21 and 5.2-35.

<sup>2</sup> *Ibid.* Page 5.2-41.

<sup>3</sup> *Ibid.* Page 5.2-42.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.  
Program Supervisor, CEQA IGR  
Planning, Rule Development & Area Sources

Attachment  
LS:RB  
LAC171116-04  
Control Number

## ATTACHMENT

### **Air Quality Analysis – Overlapping Construction and Operational Impacts**

1. When specific development is reasonably foreseeable as result of the goals, policies, and guidelines in the Proposed Project, the Lead Agency should identify any potential adverse air quality impacts and sources of air pollution that could occur using its best efforts to find out and a good-faith effort at full disclosure in the EIR. The degree of specificity will correspond to the degree of specificity involved in the underlying activity which is described in the EIR (CEQA Guidelines Section 15146). When quantifying air quality emissions, emissions from both construction (including demolition, if any) and operations should be calculated.

Based on a review of the Air Quality Analysis, the Lead Agency did not analyze a scenario where construction emissions overlap with operational emissions. Since implementation of the Proposed Project is expected over a period of 18 years, an overlapping construction and operation scenario is reasonably foreseeable, unless the Proposed Project includes requirement(s) that will avoid overlapping construction and operational activities. To properly analyze a worst-case impact scenario that is reasonably foreseeable at the time the Draft EIR is prepared, SCAQMD staff recommends that the Lead Agency identify the overlapping years, combine construction emissions (including emissions from demolition) 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 potential mitigation measures as guidance to the Lead Agency, please visit SCAQMD's CEQA Air Quality Handbook website<sup>4</sup>.

### **Comments on Existing Mitigation Measure AQ-2: Use of Level 3 Diesel Particulate Filters (DPF)**

2. The Lead Agency is committed to using Level 3 DPF for all construction equipment of 50 horsepower or more. SCAQMD staff recommends using off-road diesel-powered construction equipment that meets or exceeds the CARB and USEPA Tier 4 off-road emissions standards for equipment rated at 50 horsepower or greater during Project construction. Such equipment will be outfitted with Best Available Control Technology (BACT) devices including a CARB certified Level 4 Diesel Particulate Filter or equivalent. These requirements shall be included in applicable bid documents and successful contractor(s) must demonstrate the ability to supply such equipment. A copy of each unit's certified tier specification or model year specification and CARB or SCAQMD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment. In the event that construction equipment cannot meet the Tier 4 engine certification, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is approved by the Lead Agency before using other technologies/strategies. Alternative applicable 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 Project, using cleaner vehicle fuel, and/or limiting the number of individual construction project phases occurring simultaneously.

### **Additional Recommended Mitigation Measure – Performance Standards-Based Technology Review**

3. Since the Proposed Project would be implemented over a period of 18 years, the Lead Agency should take this opportunity to deploy strategies that will foster and facilitate the deployment of the lowest emission technologies possible. SCAQMD staff recommends that the Lead Agency develop performance standards-based technology review at a programmatic level that is generally appropriate

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<sup>4</sup> South Coast Air Quality Management District. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa>.

for an area-wide and long-range plan such as the Proposed Project. The deployment should include those technologies that are “capable of being accomplished in a successful manner within a reasonable period of time” (California Public Resources Code Section 21061.1), such as zero and near-zero emission technologies that are expected to be available in the life of the Proposed Project. As such, SCAQMD staff recommends that the Lead Agency incorporate the performance standards-based technology review or develop other comparable strategies or tools to periodically assess equipment availability, equipment fleet mixtures, and best available emissions control devices, and specify performance standards and appropriate timeline (or schedule) for the technology assessment that supports the goals and objectives of the 2016 AQMP.

#### **Compliance with SCAQMD Rule 403(e) – Large Operations**

4. The Lead Agency included a discussion on compliance with SCAQMD Rule 403- Fugitive Dust in the Draft EIR. Based on the project description, the Proposed Project is a large operation of approximately 116 acres<sup>5</sup> (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<sup>6</sup>. The requirements may include, but are not limited to, Large Operation Notification (Form 403 N), appropriate signage, additional dust control measures, and employment of a dust control supervisor that has successfully completed the Dust Control in the South Coast Air Basin training class<sup>7</sup>. Therefore, SCAQMD recommends that the Lead Agency include a discussion to demonstrate compliance with SCAQMD Rule 403(e) in the Final EIR.

#### **Other Comment – Insufficient Time for Review**

5. The Draft EIR for the Proposed Project was released for public review and comments beginning on November 15 through January 4, 2018 (SCH No.: 2015101047). However, the electronic versions of air quality modeling and HRA files, including original emission calculation spreadsheets and air dispersion modeling files (not PDF files) were not provided to SCAQMD staff for review until January 3, 2018. On October 28, 2015<sup>8</sup>, SCAQMD staff provided timely comments on the Notice of Preparation (NOP) for the Proposed Project, where SCAQMD staff requested the Lead Agency send with the Draft EIR all of the air quality modeling, health risk assessment files, and original emission calculation spreadsheets in electronic versions to the SCAQMD for review. Further, in the same comment letter on the NOP for the Proposed Project, SCAQMD staff stated that without all files and supporting air quality documentation, SCAQMD staff would be unable to complete its review of the air quality analysis in a timely manner, and that any delays in providing all supporting air quality documentation would require additional time for review beyond the end of the comment period. The Lead Agency should provide all files and supporting air quality documentation for the Proposed Project to SCAQMD staff for review when the Draft EIR was released in order to allow SCAQMD the full review period. As such, SCAQMD staff requests that the Lead Agency consider to extend the public review comment period for the Draft EIR for the Proposed Project.

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<sup>5</sup> *Ibid.* Page 4.3-47.

<sup>6</sup> South Coast Air Quality Management District Rule 403. Last amended June 3, 2005. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf>.

<sup>7</sup> South Coast Air Quality Management District Compliance and Enforcement Staff’s contact information for Rule 403(e) Large Operations is (909) 396-2608 or by e-mail at [dustcontrol@aqmd.gov](mailto:dustcontrol@aqmd.gov).

<sup>8</sup> South Coast Air Quality Management District. NOP Comment Letter, dated October 28, 2015. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/october/nopcityofhope.pdf>.