



South Coast
Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

E-Mailed: January 7, 2011
cbowcock@ci.la-verne.ca.us

January 7, 2011

Ms. Candice Bowcock
Community Development
City of La Verne
3660 "D" Street
La Verne, CA 91750

**Review of the Negative Declaration (ND) for the
Mt. San Antonio College Fire Academy, Training Facility and Fire Tower Project**

The South Coast Air Quality Management District (AQMD) 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 revised or final CEQA document as appropriate.

The AQMD staff is concerned that the lead agency has not demonstrated that the proposed project will have less than significant air quality impacts. Absent a regional, localized and greenhouse gas (GHG) emissions analysis that quantifies the project's air quality impacts the lead agency is unable to support its conclusion that the project will have no air quality impacts. Therefore, AQMD staff requests that the lead agency revise the CEQA document to include a localized and regional air quality analysis and GHG analysis. In the event that the lead agency's revised CEQA document demonstrates significant adverse air quality impacts the AQMD staff recommends that the lead agency require mitigation pursuant to Section 15370 of the CEQA Guidelines.

The AQMD staff is available to work with the lead agency to address these issues and any other questions regarding air quality that may arise. Please contact Dan Garcia, Air

Ms. Candice Bowcock
Assistant Planner

2

January 7, 2011

Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,



Ian MacMillan
Program Supervisor, CEQA Inter-Governmental Review
Planning, Rule Development & Area Sources

Attachment

IM:DG

LAC101216-01
Control Number

1. Project Description

The Project Description provided in the ND does not provide sufficient information to fully evaluate the potential air quality impacts from the proposed project. For example, contained fires for training purposes will occur at the project site during the operational phase of the project, however, the lead agency failed to mention this activity in the project description.¹ Therefore, the AQMD staff recommends that the lead agency revise the project description to include adequate information (e.g., frequency, duration, and size of training fires, types of fuel burned, etc.) regarding the project's potential air quality impacts.

Quantification of localized and Regional Construction and Operational Emissions

2. The lead agency did not quantify the potentially significant adverse regional and localized construction and operational air quality impacts from the proposed project. As a result, it has not demonstrated that project's air quality impacts are insignificant. On page 7 of the ND the lead agency finds that all air quality impacts from the project are less than significant; however, the lead agency does not substantiate its findings that the proposed project will have no air quality impacts. To adequately evaluate the project's air quality impacts, it is necessary to quantify construction (e.g., grading, paving, building, coatings) and operational (e.g., vehicle trips, training fires, landscaping equipment, etc) emissions and compare them to the applicable significance thresholds.

Given that there appears to be sensitive receptors (i.e., residential community, park, and school) located within a quarter of a mile north of the proposed project the lead agency should compare the project's construction and operational emissions to the applicable localized (LST) and regional significance thresholds. Therefore, the AQMD staff recommends that the lead agency revise the CEQA document to include the localized and regional air quality impacts from construction and operational activities at the project site. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings used for striping traffic lanes or any associated structures, off-road equipment and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operational-related air quality impacts typically include, but are not limited to, emissions from on-road mobile sources (i.e., trips generated by the facility), landscaping equipment, natural gas emissions, and specific to this project; emissions from training fires.

The AQMD adopted its CEQA Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The AQMD recommends that the lead agency use this Handbook as guidance when preparing its revised air quality analysis. Additionally, the lead agency may be able to use the URBEMIS 2007

¹ Based on a phone conversation with Ms. Candice Bowcock on 1/6/2010 AQMD staff learned that the proposed project will contain fires for training purposes.

Model. Information regarding the URBEMIS 2007 Model and the CEQA Air Quality Handbook and subsequent updates is available on the AQMD Website at:
<http://www.aqmd.gov/ceqa/hdbk.html>

Quantification of Greenhouse Gas (GHG) Emissions

3. The AQMD staff is concerned that the lead agency has failed to calculate GHG emissions impacts from the proposed project. The AQMD staff would like to remind the lead agency that Section 15064.4 of the CEQA guidelines requires that the lead agency “make a good faith effort” to quantify the GHG emissions impacts from the proposed project. Therefore, AQMD staff requests that the lead agency revise the CEQA document to include a quantitative analysis of greenhouse gases, a determination of significance, and if necessary, feasible mitigation measures.

Air Quality Mitigation Measures

4. In the event that the lead agency’s revised CEQA document requested in the comments above demonstrates significant adverse air quality impacts the AQMD staff recommends that the lead agency require mitigation pursuant to Section 15370 of the CEQA Guidelines that could minimize or eliminate these impacts. To assist the lead agency with identifying possible mitigation measures for the project, please refer to Chapter 11 of the AQMD CEQA Air Quality Handbook for sample air quality mitigation measures. Also, a list of mitigation measures can be found on the AQMD’s CEQA webpage at the following internet address:
www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.htm

Additionally, AQMD’s Rule 403 – Fugitive Dust, and the Implementation Handbook contain numerous measures for controlling construction-related emissions that should be considered for use as CEQA mitigation if not otherwise required.

Applicable AQMD Rules and Regulations

5. As a reminder, in addition to the Rule 403 mentioned in Section III (Air Quality) of the ND, the AQMD staff recommends that compliance with Rule 444 - Open Burning be addressed in the final CEQA document.