

Memorandum

Date:	July 21, 2016
То:	Gordon Mize, SCAQMD
CC:	Mika Klein, Mt. SAC
From:	Fred Greve, Greve & Associates Sid Lindmark, Sid Lindmark and Associates Deepak Kaushik, Iteris
Subject:	Preliminary Responses to Comment 6-5.1 on Mt.SAC EIRs

Please see our responses to your latest comment made on the Mt. San Antonio College EIRs. I hope this clarifies the situation.

<u>SCAQMD Comment 6-5.1.</u> "I have looked at the cities mentioned in the DSEIR. I also see the wording and the CO hotspots analysis discussion on pages 166-167. We might recommend in our comments is that the Olympic Trials applicable criteria regional and localized significance threshold emissions should be included, i.e., broken out and presented separately in the Final DSEIR. The reason for this is that the Olympic Trials is a unique and separate activity as pointed out in the project description that is expected to draw an estimated 20,000 daily visitors during that 8-10 day period. Besides vendor, maintenance and support traffic, this would involve passenger vehicles including carpools, as well as buses and shuttles for the participants and visitors. This will give the general public and other interested parties a feel for those impacts compared to the applicable thresholds of significance."

<u>Response to Comment 6.5.1.</u> The comment concerning the cities (i.e. presumably the cities in which shuttle lots may occur for the Trials) and the CO hotspots analysis on pages 166-167 is noted. To our knowledge, there are no special or unique SCAQMD criteria for regional and local significance threshold emissions for special events, whether they are consecutive daily tournament events for many days, or multiple sporting events. Events are evaluated on a daily basis.

The DSEIR uses the proper SCAQMD regional and local significance threshold emissions for the SCAB and SRA 10. While the analysis may be fragmented between the traffic, 2020 Olympic Track & Field Trials parking plans and the air quality analysis, we believe all the relevant components are included in the DSEIR and result in an adequate air quality analysis for hosting the event on campus. The following four points support this conclusion.

First, the 2020 Olympic Track & Field Trial trips assigned to the network within the traffic study area (19 intersections in Figure 1 in Appendix M1) are the trips resulting from Parking Plan A (Table 8) and the trip distribution in Figure 5. These assumptions allowed the total trips for the guest carpools to the campus or shuttle parking lots within the traffic study area (i.e. based on the required vehicle occupancy requirements for the shuttle or campus parking lots), faculty and staff trips to the campus, the capacity of the shuttles, the trip distribution, and the distance to be determined. The Preliminary Event Schedule (Table 5) Shuttle Service Schedule (Table 6) and Shuttle Lot Locations (Figure 3) provide the information needed to assign Trial event trips to the network. The resulting trips for carpools, faculty/staff trips and shuttles were then assigned to each link in the area circulation system so the traffic level of service could be calculated.

The trip link volumes for Plan A described above were also used for the air quality analysis for the Trials in Appendix C1. The intersection volumes for the Trials (VPH) were projected in Table 12 (p. 20 of Appendix C1). The Trials trip volumes are then compared to the volumes in the hotspot analysis for the Redesignation Request (Response 6.4.3 above). <u>No significant air quality emissions occur.</u>

Second, while the traffic analysis does not explicitly include the capacity of vendor, maintenance and support traffic, the magnitude of the trips from these sources will likely occur before the Trials begin, and after the Trials end. The magnitude of trips associated with vendors, maintenance or support traffic during the Trials will be minimal, and should only include re-supply efforts if vendors need additional supplies or materials. The disposal of solid waste (i.e. support traffic) may not occur on a daily basis. Solid waste can be stored temporarily on campus. All of the trips associated with vendors, maintenance and support traffic can also occur outside of peak hours. Therefore, these trip modes have little impact on daily air quality emissions.

Third, while the Ontario Airport, Covina high schools, and Diamond Bar High School shuttle lot locations are in cities outside of the traffic study area, the trips associated with these remote lots are not of a high magnitude and are a very small proportion of the freeway volumes. The airport shuttle activity is also concentrated before Session 1, before Session 2, and after the event closes; not on a daily basis.

Fourth, the VMT for the campus in 2015, 2020 and 2025 is known. Table 6.5.1 is based on the CalEEMod output files in Appendix C2. The VMT data can be compared with the ADT data to derive an estimate of the VMT for hosting the Olympic Trials with classes not in session.

This campus generates 44,263 ADT in 2015. Student enrollment increases will result in an increase of 4,606 ADT for assigned trips for 2020 and an increase of 8,798 ADT in 2025 (Tables 5 and 6 in Appendix C1).

With classes not in session, hosting the 2020 Olympic Trials results in only 36 percent of the 2015 campus ADT and has no significant impact on VMT and associated regional air quality emissions.

Table 6.5.1 Vehicle Miles Traveled

Year	Annual VMT	Daily VMT	ADT		
2015	100,305,908	385,792	44,363		
2020	110,744,868	425,942	48,969		
2025	120,243,333	462,475	53,061		
2020 Trials (Plan A)		167,648 (1)	15,938		
Source: CalEEMod Output Files, Appendix C2, pp. 94, 103; (1) Derived from VMT/ADT ratio for 2020. Based on 260 days for CalEEMod academic calendar year and 10 day 2020 Olympics Track & Field Trials.					

The guest carpool trips for Parking Plan C for the Trials with classes in session account for 42 percent (5,941/14,064 spaces) of the total trips (Table 3.11.9 in DSEIR). Plan C requires both students and guests to achieve high vehicle occupancy (usually 4.0). The number of shuttle lots off-campus increases from six to nine so trips and air quality impacts occur over a larger geographical area. Hosting the Olympics is also a single event, while cumulative projects are permanent.

In conclusion, the District maintains the existing air quality analysis is adequate and is based on the on-campus and off-campus parking plans for hosting the projected number of daily guests.