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Draft Subsequent Environmental Impact Report (Draft SEIR) for Proposed Irvine Campus Medical Complex Project (Proposed Project) (SCH No.: 2020029099)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments include a recommended revision to the air dispersion modeling, South Coast AQMD's permits, and compliance with South Coast AQMD rules and regulations that the Lead Agency should include in the Final SEIR.

South Coast AQMD Staff's Summary of Project Description

The Lead Agency proposes to demolish 11,838 square feet of existing infrastructure and construct a 360,000-square-foot hospital, a 225,000-square-foot medical office building, and 710,596 square feet of parking on 14.5 acres (Proposed Project). The Proposed Project is located at the University of California, Irvine campus near the southwest corner of Jamboree Road and Campus Drive within the City of Irvine. Construction is anticipated to begin in April 2021 and will be completed by October 2023[1]. Once operational in 2023, the Proposed Project will generate 8,550 average daily trips and include the operation of a central plant building which will include the use of stationary source equipment such as boilers and backup emergency generators[2]. The nearest existing sensitive receptors (i.e. residential uses) to the Proposed Project are located 450 feet west of the Proposed Project[3].

South Coast AQMD Staff's Summary of the Air Quality Analysis

In the Air Quality Analysis Section of Draft SEIR, the Lead Agency quantified the Proposed Project's regional construction and operational emissions and compared those emissions to South Coast AQMD's regional air quality CEQA significance thresholds for construction and operation. Based on the analysis, the Lead Agency found that the Proposed Project's regional construction air quality impacts would be less than significant before implementation of Mitigation Measure AQ-1 (MM AQ-1), which includes, but is not limited to, fugitive dust control measures, use of alternatively fueled construction equipment, where feasible, and use of low VOC coatings[4]. The Proposed Project's regional operational air quality impacts from NOx emissions would be significant at 82 pounds per day (lbs/day), which is above South Coast

[1] Draft SEIR. Executive Summary. Page ES-4.
[2] Draft SEIR. Section 3.2 Air Quality. Page 3.2-22 to 3.2-23.
[3] *Ibid.* Page 3.2-12.
[4] *Ibid.* Pages 3.2-21, 3.2-25 to 3.2-26.

AQMD's regional air quality CEQA significance threshold for operational NOx emissions at 55 lbs/day[5]. The Lead Agency is committed to implementing Mitigation Measure AQ-2 (MM AQ-2) and Mitigation Measure AQ-3 (MM AQ-3). MM AQ-2 requires rideshare incentives, expansion of shared transit systems, and use of Best Available Control Technology (BACT) for stationary sources[6]. MM AQ-3 requires that the backup diesel generator meet Tier 4 engine standards or use a Level 3 Verified Diesel Emission Control System[7]. With implementation of MM AQ-2 and MM AQ-3, the Proposed Project's operational NOx emissions would be reduced to 38 lbs/day[8].

The Lead Agency analyzed the Proposed Project's localized air quality impacts and found they were less than significant[9].

The Lead Agency conducted a construction Health Risk Assessment (HRA) and modeled the construction exhaust emissions in AERSCREEN to determine pollutant concentrations from mobile sources (i.e. off-road equipment). The highest calculated cancer risk during construction would be 7.23 in one million[10], which would not exceed South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk[11]. The Lead Agency also modeled operational stationary source emissions in AERSCREEN to determine pollutant concentrations from boilers and backup emergency generators. The highest calculated cancer risk during operation would be 6.30 in one million[12], which would also not exceed South Coast AQMD's CEQA significance threshold of 10 in one million.

South Coast AQMD Staff's Comments

Air Dispersion Modeling

According to the Draft SEIR, the Proposed Project includes operation of four stationary equipment or two emission source types: two backup emergency generators and two boilers. The stationary equipment will be operated at two different locations at the Proposed Project: the Central Utility Plant and the Clinics and Ambulatory Services Building. The Lead Agency performed project-specific air dispersion modeling using AERSCREEN and modeled emissions from two backup emergency generators and two boilers together as a single point source with the following parameters: 20-foot stack height, a 0.61-meter diameter stack, a velocity of 24.7 meters per second, and a temperature of 673 Kelvins.

[5] *Ibid.* Pages 3.2-21 to 3.2-22.
[6] *Ibid.* Pages 3.2-26 to 3.2-27.
[7] *Ibid.*
[8] *Ibid.* Page 3.2-23.
[9] *Ibid.* Pages 3.2-29 to 3.2-30.
[10] *Ibid.* Pages 3.2-31 to 3.2-34.
[11] South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk is based on the most current methodology recommended by the California Office of Environmental Health Hazard assessment.
[12] *Ibid.*

AERSCREEN is a U.S. Environmental Protection Agency-approved screening model of AERMOD and is designed to model single-source scenarios[13] or multiple emission sources with the same emission characteristics. The Proposed Project includes operation of four stationary equipment at two different locations. Depending on the emission characteristics, the stationary equipment at the Proposed Project represent different emission characteristics. Therefore, it is more appropriate to use AERMOD to model pollutant concentrations from these emission sources. Additionally, as discussed in the comment below, operation of the backup emergency generators and boilers at the Proposed Project requires permits from South Coast AQMD, unless exempted by South Coast AQMD Rule 219. South Coast AQMD uses the most recent version of AERMOD to conduct modeling analysis for reviewing permit applications[14]. Therefore, South Coast AQMD staff recommends that the Lead Agency use the most recent version of AERMOD (version 19191) to model the Proposed Project's operational stationary source emissions and identify the maximum concentration for the operational HRA in the Final SEIR. Alternatively, if the Lead Agency does not use AERMOD in the Final SEIR, it should provide reasons as substantial evidence in the record to support that it is more appropriate to use AERSCREEN to model pollutant concentrations from stationary sources during operation of the Proposed Project.

Responsible Agency, South Coast AQMD's Permits, and Compliance with South Coast AQMD Rules and Regulations

In the Draft SEIR, the Lead Agency identified South Coast AQMD as a Responsible Agency for the Proposed Project (CEQA Guidelines Section 15381) since implementation of the Proposed Project will require permits from South Coast AQMD[15]. However, at the time of the release of the Draft SEIR, South Coast AQMD has not received permit applications related to the Proposed Project. Since the Proposed Project is anticipated to include new, stationary source equipment such as backup emergency generators and boilers, the Proposed Project may be required to submit complete and timely permit applications to South Coast AQMD for such equipment. Therefore, it is recommended that the Lead Agency consult with South Coast AQMD's Engineering and Permitting staff to determine if any permits from South Coast AQMD will be required for operation of the backup emergency generators and boilers, and if compliance with applicable South Coast AQMD rules is required and should be discussed in the Air Quality Section of the Final SEIR.

It is important that the permits are fully and adequately evaluated in the Final SEIR as required under CEQA Guidelines Section 15096(b). It is also important to note that the assumptions used in the Air Quality Analysis in the Final SEIR will be used as the basis for evaluating the permits under CEQA and imposing permit conditions and limits. If there is any information in the permitting process suggesting that the Proposed Project would result in significant adverse air quality impacts not analyzed in the Final SEIR, or substantially more severe air quality impacts than those analyzed in the Final SEIR, the Lead Agency should commit to reevaluating the Proposed Project's air quality and health risks impacts through a CEQA process (CEQA

[13] United States Environmental Protection Agency (U.S. EPA). "Revisions to the Guideline on Air Quality Models: Enhancements to the AERMOD Dispersion Modeling System and Incorporation of Approaches to Address Ozone and Fine Particulate Matter". 82 Fed Reg. 5209 (January 2017).

[14] South Coat AQMD. *South Coast AQMD Modeling Guidance for AERMOD*. Accessed at: http://www.aqmd.gov/home/air-quality/meteorological-data/modeling-guidance/submittal-requirements.

[15] Draft SEIR. Executive Summary. Page ES-5.

Guidelines Section 15162). Questions on permits and applicable South Coast AQMD rules can directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385. For more general information on permits, please visit South Coast AQMD's webpage at: http://www.aqmd.gov/home/permits.

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), South Coast AQMD staff requests that the Lead Agency provide South Coast AQMD staff with written responses to all comments contained herein prior to the certification of the Final SEIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and to the public who are interested in the Proposed Project.

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Alina Mullins, Air Quality Specialist, at amullins@aqmd.gov, should you have any questions or wish to discuss the comments.

Sincerely,

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