

RESPONSE TO COMMENTS ON THE CIRCULATED INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

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Air Pollution Control District
San Luis Obispo County

August 27, 2015

Joel Neel, Director
Facilities Planning and Capital Projects
Building 70
Cal Poly State University
San Luis Obispo, CA 93407

SUBJECT: SLOCAPCD Comments Regarding the California Polytechnic State University
Vista Grande Replacement & Culinary Support Center Expansion Initial
Study / Mitigated Negative Declaration

Dear Mr. Neel,

Thank you for including the San Luis Obispo County Air Pollution Control District (SLOCAPCD) in the environmental review process. We have completed our review of the proposed project located at California Polytechnic State University in San Luis Obispo.

The project consists of two elements within the Cal Poly campus. The Vista Grande component includes complete demolition of the existing dining facility and construction and operation of a new Vista Grande Dining Facility. The Culinary Support Center element includes expansion of the existing Corporation Warehouse to support truck deliveries for campus food services. Approximately 4,150 square feet of the building would be demolished, a 4,000 square foot expansion is proposed off the northern extent of the existing building and a 8,059 square foot expansion is proposed off the southeastern extent.

The following are SLOCAPCD comments that are pertinent to this project.

GENERAL COMMENTS

As a commenting agency in the California Environmental Quality Act (CEQA) review process for a project, the SLOCAPCD assesses air pollution impacts from both the construction and operational phases of a project, with separate significant thresholds for each. **Please address the action items contained in this letter that are highlighted by bold and underlined text.**

SPECIFIC COMMENTS

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In addition to the ton/quarter threshold, the SLOCAPCD also has daily (lbs/day) thresholds for construction emissions. **The construction emissions should be compared to these thresholds as well as the quarterly thresholds. The IS/MND should be revised to**

include a table summarizing the construction daily emissions from both the Vista Grande project and the Culinary Support Center project, as was done for the tons/quarter.

The CalEEMod modeling runs were included in Appendix A of the Initial Study.

The modeling results indicate the SLOAPCD daily (lbs/day) threshold would be exceeded in 2018 due to the architectural coatings. **Mitigation measures should be provided to reduce this impact. This could be accomplished by reducing the VOC content of the paint used and/or adjusting the schedule for architectural coating applications to extend the painting activities thereby limiting the daily coating activities to ensure emissions remain below the threshold, or other options as the project proponent deems appropriate. The method(s) selected should be clearly outlined in the mitigation measures.**

Page 29

The un-mitigated operational emissions in lbs/day presented in Table 3 do not match the number in Appendix A for the Culinary Support Center. This should be checked and corrected as needed.

Page 30

It should be noted that all projects within 1,000 feet of any sensitive receptor (student housing) shall implement all dust controls necessary to manage fugitive dust emissions such that they do not exceed the SLOAPCD's 20% opacity limit (SLOAPCD Rule 401) or prompt nuisance violations (SLOAPCD Rule 402).

In addition to the Dust Control Measures which were outline on pages 30 and 31, **SLOCAPCD recommends the following measures be included in the list of applicable mitigation for this project.**

- Install wheel washers where vehicles enter and exit unpaved roads onto streets, or wash off trucks and equipment leaving the site;
- All PM10 mitigation measures required should be shown on grading and building plans;
- Since water use is a concern due to drought conditions, the contractor or builder shall consider the use of a SLOCAPCD-approved dust suppressant where feasible to reduce the amount of water used for dust control.

SLOCAPCD also recommends mitigation measure MM AIR -1 (j) be modified as follows:

"The contractor or builder shall designate a person or persons to monitor the fugitive dust emissions and enhance the implementation of the measures as necessary to minimize dust complaints and reduce visible emissions below the SLOCAPCD's limit of 20% opacity for greater than 3 minutes in any 60 minute period. Their duties shall include holidays and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the SLOAPCD Compliance Division prior to the start of any grading, earthwork or demolition."

Page 30

Mitigation measure MM AIR-1(o) states "It shall be the University's sole discretion as to what constitutes a nuisance." As noted above, **District Rule 402, which deals with Nuisance Complaints, would also be applicable during construction activities.**

Page 31

Since work will be conducted in close proximity to sensitive receptors, SLOCAPCD recommends the following measures be added to the list of equipment emission controls:

- Equipment Selection
The equipment that shall be used most often near sensitive receptors shall be either 1) equipped with either Tier 4 engines, or 2) Tier 3 engines with ARB verified Level 3 exhaust retrofits, or shall be 3) alternatively fueled engines (compressed natural gas, electric etc.).
- Idling Limitations
Idling Restrictions Near Sensitive Receptors for Diesel Equipment:
 - Idling areas shall not be located within 1,000 feet of sensitive receptors;
 - Diesel idling within 1,000 feet of sensitive receptors is not permitted;
 - Signs that specify the no idling requirements must be posted and enforced at the site.
- Equipment staging areas
Equipment staging areas should be located at least 1,000 feet from sensitive receptors.
- Work Scheduling
Work that will involve the heaviest use of diesel equipment should be scheduled to occur when school is out of session to the extent feasible.

Page 31

Under MMAIR-2 it should be noted that the condition stating, "Use Caterpillar pre-chamber, diesel fired engines (or equivalent low NOx engine design) in heavy -duty equipment used to construct the project to further reduce NOx emission," is outdated and can be removed.

Page 32 AQ-6

Truck Routing - It should be noted if the project has significant truck trips where hauling/truck trips are routine activity and operate in close proximity to sensitive receptors, toxic risk needs to be evaluated.

Page 32

Please note, **certain types of equipment may require a permit to construct, in addition to a permit to operate as referenced in AQ7.** Operational sources may require SLOCAPCD permits. The following list is provided as a guide to equipment and operations that may have permitting requirements, but should not be viewed as exclusive. For a more detailed listing, refer to the Technical Appendix, page 4-4, in the SLOCAPCD's 2012 CEQA Handbook.

- Portable generators and equipment with engines that are 50 hp or greater;
- Electrical generation plants or the use of standby generator;
- Food and beverage preparation (primarily coffee roasters);
- Boilers;
- Internal combustion engines;
- Sterilization units(s) using ethylene oxide and incinerator(s);
- Cogeneration facilities;

Most facilities applying for an Authority to Construct or Permit to Operate with stationary diesel engines greater than 50 hp, should be prioritized or screened for facility wide health risk impacts. A diesel engine-only facility limited to 20 non-emergency operating hours per year or that has demonstrated to have overall diesel particulate emissions less than or equal to 2 lb/yr does not

need to do additional health risk assessment. **To minimize potential delays, prior to the start of the project, please contact the SLOAPCD Engineering Division at (805) 781-5912 for specific information regarding permitting requirements.**

SLOAPCD also recommends the following mitigation measure be included in the list of applicable measures for this project.

Developmental Burning

Effective February 25, 2000, **the SLOAPCD prohibited developmental burning of vegetative material within San Luis Obispo County.** If you have any questions regarding these requirements, contact the SLOAPCD Enforcement Division at 781-5912.

Residential Wood Combustion

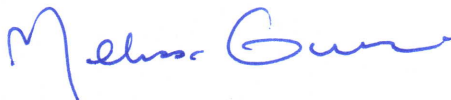
Under SLOAPCD Rule 504, **only SLOAPCD approved wood burning devices can be installed in new dwelling units.** These devices include:

- All EPA-Certified Phase II wood burning devices;
- Catalytic wood burning devices which emit less than or equal to 4.1 grams per hour of particulate matter which are not EPA-Certified but have been verified by a nationally-recognized testing lab;
- Non-catalytic wood burning devices which emit less than or equal to 7.5 grams per hour of particulate matter which are not EPA-Certified but have been verified by a nationally-recognized testing lab;
- Pellet-fueled woodheaters; and
- Dedicated gas-fired fireplaces.

If you have any questions about approved wood burning devices, please contact the SLOAPCD Enforcement Division at 781-5912.

Again, thank you for the opportunity to comment on this proposal. If you have any questions or comments, feel free to contact me at 781-4667.

Sincerely,



Melissa Guise
Air Quality Specialist

MAG/arr

cc: Dora Drexler, Enforcement Division, SLOAPCD
Gary Willey, Engineering Division, SLOAPCD

Response to: San Luis Obispo County Air Pollution Control District (SLOAPCD) Comments Regarding the California Polytechnic State University Vista Grande Replacement & Culinary Support Center Expansion Initial Study/Mitigated Negative Declaration (letter received August 27, 2015)

Please refer to the Revised Initial Study and Mitigation Monitoring and Reporting Program, which incorporates minor clarifications in response to the comment letter. No new, avoidable, significant effects were identified. These clarifications include insignificant modifications to the Initial Study. The clarifications to the mitigation measures would further reduce potentially significant impacts, which were identified in the circulated Initial Study.



Community Development

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805.781.7170
slocity.org

September 4, 2015

Joel Neel
Director, Facilities Planning and Capital Projects
Building 70
Cal Poly State University
San Luis Obispo, CA 93407

SUBJECT: City of San Luis Obispo comments on the Initial Study/Mitigated Negative Declaration for the new Vista Grande Dining Facility and Culinary Support Center Expansion

This letter serves as the City of San Luis Obispo's comment letter on the above referenced Initial Study/Mitigated Negative Declaration (IS/MND). City Departments have reviewed the proposed IS/MND and the City offers the following comments which should be responded to in the final IS/MND to adequately address the potential environmental effects of the proposed project:

Public Works Transportation Division Comments

1. **Temporary Traffic Impacts.** There is no description of what happens in the interim period of time between demolition (2015-16) and final construction (2017). What happens to the daily diners? Are there temporary facilities to which dining will be relocated? Please identify that location and indicate whether the facility/facilities have capacity for the increased demand. If no temporary dining facilities are provided, where are students expected to dine? If capacity does not exist on-campus, many students will choose to eat off-campus and this is not reflected in the description or TIS work and needs to at least be discussed.
2. **CCTC Study.**
 - a. There is no discussion about increases in employees or staff as part of the expansions of the two buildings. Both are described as supporting increase and/or expansion of operations which would imply additional employees at this location. The TIS does not discuss this and instead makes a determination that all people going to the site will be walking in. The TIS needs to discuss potential employee increases and identify if, or if not, there is a potential impact.
 - i. How many existing employees at each site
 - ii. How many new employees at each site
 - iii. Potential trip generation, if any
 - iv. Determine mitigation or conditions of approval needed to ensure MND finding

- b. The TIS and project description does not fully discuss the 5,000 sq. ft. of the Cal Poly Corporation Offices. Is this a relocation of existing space? New office space? If new, the TIS should discuss and determine if a significant impact is exceeded.
 - i. How many existing employees at each site
 - ii. How many new employees at each site
 - iii. Potential trip generation, if any
 - iv. Determine mitigation or conditions of approval needed to ensure MND finding
- c. The project description includes the phrase: “Special function venues would be available for rent by the public.” (Page 9). The TIS and project description does not include additional discussion on this topic or indicate if this is an ancillary use or additional use above existing trip generation. The TIS should at least acknowledge these uses and make a determination of significance.
- d. Construction Traffic – Impact on Residential Neighborhoods. The TIS does not discuss the potential impact of construction truck or worker impacts along existing residential streets or corridors. The project construction will coincide with construction of the Housing South Campus Dormitory project and will likely all be oriented towards the Grand Avenue corridor.
 - i. Noise is discussed for Grand Avenue but traffic is not. Please address this factor.
 - ii. Potential conflict with elementary school operations is of concern and is not discussed in the document. Measures should be established to avoid conflicts with school traffic particularly pedestrian and bicycling children accessing the school facilities.
 - iii. Significant degradation of existing pavement and other infrastructure along Grand will result as part of construction, especially when combined with Housing South construction traffic. This is a potential impact of responsible agency services but is not discussed in the Initial Study (IS).
 - iv. The IS establishes the following mitigation measure: “A haul route shall be prepared for review and approval by the University which designates haul routes as far as possible from sensitive receptors.” The City requests to be included in the review and approval of this haul route plan so as to ensure avoidance of impacts in residential areas of the City.
 - v. With overlap of construction activities of Housing South Dormitory project and Vista Grande project, there is concern about temporary impacts to neighborhoods associated with construction worker commute. Please indicate how the temporary impacts of traffic increase will be addressed and identify areas where worker parking will be accommodated on campus.

Fire Department

Please correct the following:

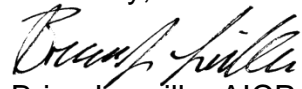
- 1) Section XIV Public Services, comment a-i states: that the California Department of Forestry and Fire Protection (Cal Fire) provides emergency response to the University and proposed project, this should be changed to The City of San Luis Obispo Fire Department under contract with California Polytechnic State University- San Luis Obispo.

The City requests to continue to be notified/consulted on further project review such as any significant project modifications, environmental review, and upcoming hearings.

Please feel free to contact me if you have any questions or would like to arrange a meeting. I can be contacted by phone at 805-781-7166, or by e-mail: bleveille@slocity.org

Thank you for considering City Community Development Department comments on the proposed project.

Sincerely,



Brian Leveille, AICP

Senior Planner

Long Range Planning

City of San Luis Obispo, Community Development Department

CC: San Luis Obispo City Council
Derek Johnson, Community Development Director
Tim Bochum, Deputy Director of Public Works
Jake Hudson, Traffic Operations Manager
Hal Hannula, Supervising Civil Engineer
Roger Maggio, Fire Marshal

Response to: City of San Luis Obispo comments on the Initial Study/Mitigated Negative Declaration for the new Vista Grande Dining Facility and Culinary Support Center Expansion (letter received September 4, 2015)

Please refer to responses below, which are numbered to directly correlate with the organizational structure of the comment letter:

Public Works Transportation Division Comments:

1. Temporary Traffic Impacts. In the interim period between demolition of the existing Vista Grande dining facility and completion of the proposed dining facility, students would be directed to the 20 existing dining facilities and stores within the campus core. No temporary facilities are proposed. The capacity of these existing facilities would be adequate to serve the temporary increase in student diners. Vista Grande primarily serves students living on campus and campus faculty, who have purchased on-campus dining plans; therefore, it is unlikely that there would be an increase in students exiting campus for meals. Therefore, no significant impact would occur.
2. CCTC Study.
 - a. As noted in the Initial Study, the project is not anticipated to result in increased trips, as the dining facility would continue to serve similar populations of diners and Corporation staff. The proposed Vista Grande dining facility component would require similar numbers of student and non-student employees during operation, and would not result in any increase in operational trips compared to existing conditions. The project would not result in a significant increase in trips compared to existing conditions, which includes existing employees and Cal Poly Corporate staff; therefore, no significant impact would occur.
 - b. The proposed Cal Poly Corporation Offices would constitute a relocation of an existing use. Existing employees would be relocated following construction of the facility and the proposed offices to maximize efficient operation of the Campus Dining program. Therefore, no significant impact would occur.
 - c. Special function venues are intended to be used for University functions on a periodic basis, similar to existing conditions at the Sage Restaurant (to be demolished). The special function area would be open for regular dining seating under normal operating conditions. Therefore, no significant impact would occur.
 - d. Construction Traffic – Impact on Residential Neighborhoods.
 - i. Construction of the project will generate ongoing traffic associated with worker vehicles, equipment delivery and use, and materials delivery and haul-off. Volumes will vary depending on the stage of construction. As noted in the Initial Study, standard measures would be implemented during construction to ensure pedestrian and bicycle safety near the project site. This includes implementation of mitigation from the current Master Plan:

Circulation Plan. Where vehicle and pedestrian routes and residential areas conflict with construction activities, a circulation plan will be developed, which will include warning signs and detours, as well as efforts to minimize noise in residential areas.

Compliance with this mitigation will be sufficient to address impacts related to circulation during construction. Impacts are considered less than significant.

- ii. As noted above, the University would prepare and implement a Circulation Plan, which would address potential conflicts with existing uses in the area, including vehicular, pedestrian, and bicycle traffic. Hauling traffic would generally avoid peak traffic hours in the morning and afternoon associated with University and off-site residential, commuting, and off-site school traffic. In addition, the Student Housing South project requires the phased closure of the existing parking lots during construction, which would redistribute campus-generated trips from Grand Avenue to Santa Rosa Street, Highland Drive, Foothill Boulevard, U.S. 101, California Boulevard, and Olive Street (as analyzed in the Student Housing South Final EIR). Therefore, potential impacts would be less than significant.
- iii. The University will monitor roadway conditions on Grand Avenue during the construction of the Student Housing South and Vista Grande projects. Based on the availability of campus land for equipment and materials staging, significant degradation of the roadway is unlikely, and potential impacts would be less than significant.
- iv. Based on the location of the project, it is anticipated that Grand Avenue will be the primary construction haul route. As noted above, hauling traffic would generally avoid peak traffic hours in the morning and afternoon associated with University and off-site residential, commuting, and off-site school traffic. University staff is available to discuss further details with the City.
- v. As noted above, the University is required to prepare a Circulation Plan, which will consider construction activities generated by both the Student Housing South project and the proposed Vista Grande project. Equipment and materials staging would occur on campus, which would minimize effects to off-campus land uses. Construction worker parking for the Student Housing South and Vista Grande projects would be located on campus, within and adjacent to the proposed development sites. During the peak construction period, the majority of construction trips will be generated by the Student Housing South project (up to approximately 250-300 workers maximum). The temporary generation of trips as a result of up to 50 construction workers per day as a result of the Vista Grande dining facility project would not significantly increase congestion on Grand Avenue or any other local or campus roadway. In addition, as noted above, construction of the Student Housing South project would result in a redistribution of trips away from Grand Avenue. Therefore, potential impacts would be less than significant.

Fire Department:

1. For the record, the University notes that while Cal Fire is an emergency responder, the University has a contract with the City of San Luis Obispo Fire Department for emergency fire protection.