



# South Coast Air Quality Management District

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November 6, 2013

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## **Draft Mitigated Negative Declaration (DMND) for the Proposed Holiday Inn Express and Suites Project – PPD No. 13-066**

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 CEQA document.

The Lead Agency proposes development on a 2.48 acre portion of a 5.27 acre site. A 52,937 square foot, 85-room, four-story hotel is planned to be built including a 8,200 cubic foot water treatment retention basin for capturing and treating storm water runoff generated on-site. located on a 5.27 acre site. Construction will last approximately 14 months beginning in January 2014. Site operations are planned to begin approximately February 2015.

The SCAQMD staff recommends that the lead agency estimate localized air quality impacts to ensure that any nearby sensitive receptors are not adversely affected by the construction activities that are occurring in close proximity. The Draft MND states on page one under surrounding land uses confirmed in an aerial map inspection that the proposed project is located within one-quarter mile of sensitive receptors (residential properties) south of the project site. SCAQMD guidance for performing a localized air quality analysis can be found on the SCAQMD web page.<sup>1</sup> Should the lead agency conclude after its analysis that construction or operational localized air quality impacts exceed the SCAQMD daily significance thresholds, staff has compiled mitigation measures in addition to those measures listed on page nine of the Draft MND that can be implemented if the air quality impacts are determined to be significant.<sup>2</sup>

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<sup>1</sup> <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>

<sup>2</sup> [http://www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html)

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In addition, the Draft MND incorrectly modified the default load factor values for off-road construction equipment in the air quality modeling. Changing the default load factor values underestimates potentially significant construction air quality impacts. In the air quality modeling, the lead agency used the most current version of the California Emission Estimator Model (CalEEMod), Version 2013.2. Since Version 2013.2 includes the most current load factor values found in OFFROAD2011, construction impacts and related analyses should be revised in the Final MND using Version 2013.2's default load factor values. No substantial evidence has been presented in the Draft MND to justify this departure from a standard default value. Should further analysis determine that these impacts are significant, further mitigation should be included in the Final MND. Details are included in the attachment.

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. The SCAQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,



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

Attachment

IM:MK:GM

SBC131018-04  
Control Number

### **Off-Road Equipment Load Factors**

1. In the air quality analysis, the Lead Agency estimated project construction air quality impacts using the CalEEMod land use model,<sup>3</sup> Version 2013.2. This model provides default values and allows user-defined overrides to estimate emissions based on the expected land use. The model run for the Draft EIR's air quality analysis shows that the default load factor settings for off-road equipment were modified, reducing each by about one third, effectively lowering the emissions calculated from these sources by one third. For example, the CalEEMod default load factor for a rubber tired dozer is 0.59; tractor / loaders / backhoe is 0.55; and a grader is 0.61. In the air quality analysis, the Lead Agency used 0.40 as a load factor for a rubber tired dozer; a load factor of 0.37 for a tractor / loaders / backhoe; and 0.41 for a grader. This one-third reduction is based on previous guidance. This interpretation did not extend to project specific analysis or the OFFROAD2011 emission factors. The one-third reduction is not recommended by the SCAQMD staff without substantial evidence to support its use. Rather, the SCAQMD staff recommends that the lead agency revise the project impacts in the Final MND using the CalEEMod model without modifying the off-road equipment load factors. CalEEMod Version 2013.2 incorporates the most recent version of OFFROAD2011<sup>4</sup> and includes up to date fleet information. Therefore, adjusting the load factor values without documentation based on substantial evidence does not demonstrate that off-road equipment emissions are less than significant.

### **Construction Mitigation**

2. Should the Lead Agency determine that construction air quality impacts are significant based on comment #1, the SCAQMD staff recommends the following mitigation measures designed to lower NOx emissions from off-site construction equipment in addition to the measures proposed by the lead agency starting on page nine of the Draft MND, if feasible. The Lead Agency should consider adopting a schedule similar to what other lead agencies in the region (including Port of Los Angeles, Port of Long Beach, LA County Metro, and City of Los Angeles)<sup>5</sup> require for all on-site construction equipment.
  - Project start, to December 31, 2014: All off-road diesel-powered construction equipment greater than 50 hp shall meet the Tier 3 off-road emission standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

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<sup>3</sup> Version 2013.2.2 is available at the following website: <http://www.CalEEMod.com>

<sup>4</sup> OFFROAD 2011 shows that additional parameters affect emissions besides load factor, and that some equipment-specific emission factors can be either higher or lower than the OFFROAD 2007 emission factors used in CalEEMod.

<sup>5</sup> For example see the Metro Green Construction Policy at:  
[http://www.metro.net/projects\\_studies/sustainability/images/Green\\_Construction\\_Policy.pdf](http://www.metro.net/projects_studies/sustainability/images/Green_Construction_Policy.pdf)

- Post-January 1, 2015: All off-road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
- A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.
- Encourage construction contractors to apply for SCAQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for SCAQMD "SOON" funds. The "SOON" program provides funds to accelerate clean up of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at the following website:  
<http://www.aqmd.gov/tao/Implementation/SOONProgram.htm>