



# South Coast Air Quality Management District

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

E-MAILED: JANUARY 13, 2012

January 13, 2012

Ms. Janet Dixon, Director, [jdixon@rusd.k12.ca.us](mailto:jdixon@rusd.k12.ca.us)  
Planning and Development  
Riverside Unified School District  
3070 Washington Street  
Riverside, CA 92504

## **Draft Mitigated Negative Declaration (Draft MND) for the Proposed John W. North High School Athletic Facilities Master Plan Completion**

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. The following comment is meant as guidance for the Lead Agency and should be incorporated into the Final CEQA document.

In the project description, the lead agency proposes construction that would improve the existing school swimming facilities, football/track field, ball fields, and hard-court areas. The proposed project construction activities would include approximately 8.87 acres per day of soil disturbance.

In the air quality analysis, the lead agency estimated project short- and long-term air quality impacts using CalEEMod, a statewide land use emissions computer model. This model uses default and user-defined settings to estimate emissions based on the land use settings. Upon review of the inputs to the model's off-road equipment list, the lead agency has modified the default settings for the load factor by reducing it by a factor of about one third, effectively lowering the emissions calculated from these emission sources by one third. For example, the CalEEMod default load factor for a tractor/loader/backhoe is 0.55; rubber tired dozer is 0.59; and a grader is 0.61. In the air quality analysis, the lead agency used 0.37 as a load factor for a tractor/loader/backhoe; 0.40 as a load factor for rubber tired dozer; and 0.41 for a grader. The lead agency explained these edits under user entered notes in the CalEEMod model output sheets stating that "CARB staff concluded that load factors in OFFROAD are 33% to high."

Currently, it is the AQMD staff's understanding that CARB does not approve of reducing the default settings in the current OFFROAD2007 at a project level because the 33% reduction in statewide emissions of diesel exhaust is not necessarily reflected in individual pieces of equipment. In fact, for some equipment types, OFFROAD2007 may underestimate emissions while others may be overestimated. Because of these revisions, CARB is currently seeking approval of the new OFFROAD2011. The AQMD staff therefore recommends that the lead agency use existing OFFROAD2007 defaults until

Ms. Janet Dixon,  
Director

2

January 13, 2012

OFFROAD2011 is incorporated into CalEEMod later this year. Therefore, even though these edits might not change the lead agency's determination of significance for construction air quality impacts, these edits to load factors are not recommended by the AQMD staff without substantial evidence to support their use. Otherwise, the lead agency should commit to enforcing the assumed lower emission factors.

Please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. The AQMD 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

IM:GM

RVC111213-01  
Control Number