



South Coast Air Quality Management District

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Draft Environmental Impact Report (Draft EIR) for the Proposed Music Festivals Plan

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. We especially appreciate your accommodating our late comments. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final CEQA document.

In the project description, the lead agency proposes renewal of the current festival permit with changes starting in 2014. The proposed Major Musical Festival Permit, however, would allow future festivals to be held on the project site grounds (Empire and El Dorado Polo Clubs and adjacent property) on up to five weekends each year from 2014 to 2030 with approval being granted with a term up to 20 years. The lead agency proposes continuation of the two existing Coachella and Stagecoach Festivals, which involve three total weekend events each year. The proposed project would also allow two additional similar festival weekend events annually in the fall. This would total five three-day weekend events (15 days per year) with a setup period for each event on Thursday and break down for each event on Monday.

The lead agency has also included in the Draft EIR a list of approximately 60 portable diesel generators that are greater than 50 horsepower for use throughout the 601-acre festival site. In addition, there are several other sources of emissions including fugitive dust from cars and equipment traveling on unpaved surfaces and vehicle exhaust. SCAQMD found several portions of the air quality analysis that should be revised in order to provide a clearer picture of the potential air quality impacts of this project. Further, we encourage the project proponents to maintain as distance as possible between sources of emissions and nearby and onsite sensitive receptors. We appreciate the additional mitigation measures that were provided to us on February 13, including the shuttle program from LAX and the use of solar power onsite. We encourage further development of measures like these. Detailed comments are attached to this letter.

Mr. Joseph Lim, AICP,
Planning Manager

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Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. The SCAQMD staff is available to work with the Lead Agency to address these issues and any other air quality 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

RVC130103-05
Control Number

Permitting Requirements

The Final EIR should include the following requirements for portable diesel generators onsite.¹

The project proponent shall only use portable diesel engines either permitted by the SCAQMD or registered under CARB's Portable Equipment Registration Program (PERP) regulations during the music festivals. If CARB-registered engines are used, these engines must meet the intended-use requirements specified in CARB's PERP regulations. Before any engines are used in the festivals, the project proponent shall provide the SCAQMD with detailed specifications and configurations of these engines and discuss with the SCAQMD the permitting requirements for these engines.

Questions concerning the generator engine specifications, configurations, and permit requirements can be directed to SCAQMD staff at (909) 396-2643.

Air Quality Technical Analysis

SCAQMD staff appreciates that an air quality technical analysis was prepared for this project. However there are several items within the analysis that require further explanation or revision in the Final EIR in order to fully disclose the potential air quality impacts of this project. The lead agency or its technical consultant is encouraged to contact SCAQMD staff to discuss any of the issues outlined below for further explanation.

Fugitive dust calculations

SCAQMD staff cannot replicate some of the fugitive dust calculations as presented in the spreadsheets attached to the air quality appendix. For example, using the specified variables in the appendix for the source labeled 'total 4', the equation should be:

$$0.1505 \text{ miles/trip} * 1250 \text{ trips} * 1.5 * (11/12)^{0.9} * (3/3)^{0.45} = 261 \text{ lb/day}$$

The results shown in the table however yield only 0.715 lb/day. This significant difference for all of the fugitive dust sources should be reconciled in the Final EIR in both the emission budget and in the dispersion modeling.

Fugitive dust from heavy equipment

The air quality analysis does not appear to include fugitive dust from the movement of heavy equipment. This emission source should be included in the emission budget and in the dispersion modeling analysis in the Final EIR.

Emission rate inputs into model

SCAQMD staff was not able to replicate the modeled input parameters using the emission calculation spreadsheets provided in the air quality appendix. For example, for parking lot 10A, the mitigated PM10 emission factor is reported as 1.833 lb/day, which

¹ CARB'S PERP can be found at the following link: <http://www.arb.ca.gov/portable/portable.htm>

equals 0.231 g/sec. The modeled input emission rate is only 0.0001806 g/sec. The connection between the modeled inputs and the emission calculations should be made more explicit in the Final EIR. In addition, the modeled inputs should be verified for accuracy after considering this comment and any other comments that might lead to other modifications in emission rates.

Receptor spacing in modeling analysis

The modeling analysis generally evaluates concentrations at receptors located approximately 50 and 150 meters away from the total project boundary. In addition, receptors located in areas surrounded by the project site are not included in the analysis, such as Mountain Vista Elementary School. The school is listed as a sensitive receptor in Table 6 of the air quality appendix, however the location of the receptor appears to be different than the maps shown in the Project Description chapter. This loose siting of modeled receptors potentially underestimates the impact of the project. The modeling analysis should include fenceline receptors plus all receptors that are surrounded by the project.

Operational limits on emissions

The air quality analysis includes limits on the types of activity that can occur with this project that are not reflected in project conditions or mitigation measures. One limit is an assumption that project activities could only occur in the months of April or October by omitting other months in the modeling analysis. The analysis also assumes that all set-up and take down activity can occur one day prior and one day after the festival. Further, the emission estimates for onsite generators assumes that they will only run for 16 hours per day with a load factor of 0.74. Unless these limitations are made a part of the project, the air quality analysis should assume that activities could occur in any month, 24 hours per day, at full operational capacity. Also, so that sensitive receptors such as residents and schools located adjacent to the project site are fully aware of potential impacts, the analysis should provide additional details regarding the length of construction and take-down activities.

Emissions from vehicles traveling to the festival

Table 4.1-17 of the Draft EIR presents the regional travel emissions for the project. SCAQMD staff was unable to identify within the technical appendix how these emissions were calculated. We are therefore unable to confirm the validity of these results.

Area source emission rates

It is not clear how the emission rates for the modeled area sources were calculated. The spreadsheets included in the air quality analysis appendix do not contain the calculations showing how these rates were derived. The use of such large area sources for much of the diesel equipment may also artificially dilute these emission sources. For example, there are 223 individual diesel generators included as part of the project, however only 24 of these sources were modeled as individual point sources. SCAQMD staff understands that it may be difficult to exactly determine the location of many movable sources, such as light towers. However, by assuming that they can occur in any location in 50+ acre areas, the emissions and subsequent calculated concentrations can be significantly

diluted, especially if some of this equipment is in fact placed close to area boundaries. SCAQMD staff recommends that a more robust description of potential siting of diesel equipment be presented, especially equipment greater than 50 hp, and that the modeling be revised to reflect this description.

Tier 4 generator emission factors

The analysis of emissions from diesel generators using Tier 4 Interim engines relied on emission factors from Table 3.5 of the CalEEMod User's Guide Appendix. There are errors in those reported emission factors that will be updated with the release of the next version of CalEEMod. In the interim, SCAQMD staff recommends that either equipment specific emission factors, or actual emission standards be used to calculate emission rates.

In addition, SCAQMD staff cannot replicate the emission calculations in the air quality appendix spreadsheets. For example, using the specified parameters for a 1490 hp engine, the calculation should be:

$$0.07 \text{ g/hp-hr} * 1490 \text{ hp} * 0.74 \text{ load} / 453.59 \text{ g/lb} = \mathbf{0.170 \text{ lb/hr}}$$

Even assuming only 16 hours of operation per day (see comment regarding operational limits), the calculation yields a value of 0.128 lb/day. The results shown in the table however yield only 0.113 lb/hr. This difference should be reconciled in the Final EIR.

Rural dispersion

Although Table 7 of the air quality appendix states that the 'urban' dispersion option was used, all of the actual modeling files printed in the appendix appeared to use the 'rural' dispersion option. SCAQMD guidance² recommends that the 'urban' dispersion option be used for all modeling within its jurisdiction.

Maps depicting modeled impacts

The Final EIR should include maps depicting the modeled impacts. If concentrations are found to be significant, the maps can help identify where those areas are and mitigation can be added (such as modifying diesel equipment locations) to reduce those impacts.

Onsite Receptor Exposure

The project will include onsite residential activities, albeit of short duration, with the inclusion of camping. In order to minimize potential exposures to those occupying the site for these longer durations, the project operator should maintain the maximum distance possible between sources of emissions, such as diesel equipment, and areas where people congregate.

Campfires

It is not clear to SCAQMD staff if campfires are permitted as part of the project. If permitted, then the lead agency should consider requiring natural gas fire pits instead of allowing wood burning. In addition, the emissions from this activity should be included in the air quality analysis.

² http://www.aqmd.gov/smog/metdata/AERMOD_ModelingGuidance.html