



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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11710 Telegraph Road

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Mitigated Negative Declaration (MND) for the Proposed Norwalk Boulevard Hotel Development Project

SCAQMD Staff's Summary of Project Description

The lead agency proposes to construct a 77,900 square foot hotel with 110 rooms and a subterranean parking structure on a 1.07 acre portion of 6.1 acres in the City of Santa Fe Springs (proposed project). According to the MND, the closest sensitive receptor (Villages at Heritage Springs) is located 154 feet southeast from the proposed project site¹.

SCAQMD Staff's Summary of Air Quality Analysis

The lead agency determined that the proposed project's regional and localized air quality impacts are less than significant. The lead agency relies on compliance with SCAQMD Rule 403 to reduce the project's PM 2.5 emissions below the localized significance threshold (LST), however, the air quality analysis does not quantify the level of PM 2.5 emissions reductions resulting from compliance with the rule. Please see SCAQMD staff's comments regarding the lead agency's air quality analysis below.

SCAQMD Staff's Comments: Localized Significance Thresholds

Localized PM 2.5 emissions during construction

The lead agency analyzed the localized construction emissions for the projects nearest sensitive receptor that is located 50 meters from the proposed project site and found that the PM 2.5 emissions would exceed the LST of 3 pounds per day². Further, the lead agency determined less than significant localized air quality impacts for PM 2.5 emissions as a result of compliance with SCAQMD Rule 403. However, the lead agency did not quantify the level of emission reductions from complying with SCAQMD Rule 403. Therefore, SCAQMD staff recommends that the lead agency revise **Table 3-3** to account for emission reductions from SCAQMD Rule 403 and compare the proposed project's localized PM 2.5 construction emissions to the appropriate LST threshold cited above. If PM2.5 is still significant at the localized level, mitigation will be required pursuant to CEQA Guidelines Section 15070 (b) and should be incorporated into the final CEQA document.

Mitigation Measures to Consider for Construction

Tier 4 Construction Equipment or Level 3 Diesel Particulate Filters

To further reduce emissions from particulate matter during construction and minimize their impacts on nearby residents, SCAQMD staff recommends that the project applicant use off-road diesel-powered construction equipment that meets or exceeds the CARB and USEPA Tier 4 off-road emissions standards for equipment rated at 50 horsepower or greater during project construction. Such equipment will be outfitted with Best Available Control Technology (BACT) devices including a CARB certified Level 3 Diesel Particulate Filter (DPF). Level 3 DPFs are

¹ MND. Section 3 Environmental Analysis: *Air Quality*. Page 48.

² MND. Section 3 Environmental Analysis: *Air Quality*. Page 50.

capable of achieving at least an 85 percent reduction in particulate matter emissions³. A list of CARB verified DPFs are available on the CARB website⁴. A copy of each unit's certified tier specification or model year specification shall be available upon request at the time of mobilization of each applicable unit of equipment. In the event that construction equipment cannot meet the Tier 4 engine certification, the project representative or contractor must demonstrate why through future study with written finding supported by substantial evidence that is approved by the lead agency before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, construction equipment with Tier 3 emissions standards, reduction in the number and/or horsepower rating of construction equipment, limiting the number of daily construction haul truck trips to and from the proposed project, and using cleaner vehicle fuel.

Diesel-Fueled Trucks with 2010 Model Year Engines

To further reduce the impacts of particulate matter emissions on nearby residents during construction, the lead agency should require the use of diesel haul trucks that conform to 2010 EPA truck standards or newer diesel haul trucks (e.g., material delivery trucks and soil import/export) during construction. If the lead agency determines that 2010 model year newer diesel haul trucks are not feasible, supported by substantial evidence in the record, the project applicant shall use trucks that meet EPA 2007 model year NOx emissions requirements, at a minimum.

SCAQMD 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, Assistant Air Quality Specialist, at amullins@aqmd.gov or (909) 396-2402, should you have any questions.

Sincerely,

Daniel Garcia

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Planning, Rule Development & Area Sources

DG/AM

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Control Number

³ California Air Resources Board. November 16-17, 2004. Diesel Off-Road Equipment Measure – Workshop. Page 17. Accessed at: https://www.arb.ca.gov/msprog/ordiesel/presentation/nov16-04_workshop.pdf

⁴ *Ibid.* Page 18.