



County of El Dorado Air Quality Management District

330 Fair Lane, Placerville Ca 95667
Tel. 530.621.7501 Fax 530.295.2774
www.edcgov.us/airqualitymanagement

Dave Johnston
Air Pollution Control Officer

March 21, 2017

Project Planner
El Dorado County Planning Services
2850 Fairlane Court
Placerville, CA 95667

RE: Diamond Springs Village Apartments – AQMD Comments

Dear Sirs:

The El Dorado County Air Quality Management District (AQMD) has reviewed the proposed 81 unit multifamily apartment complex and the associated CalEEMod model runs and has the following comments regarding potential air quality impacts:

Comments:

The applicant provided air quality modeling runs using the California Emissions Estimator Model (CalEEMod, v 2013.3.1). The model concluded the daily construction emissions would exceed 127 lbs/day for Reactive Organic Gases (ROG) and 68 lbs/day for Nitrogen Oxides (NOx). The daily ROG amount exceeds the 82 lbs/day threshold as detailed in AQMD's *Guide to Air Quality Assessment: Determining Significance of Air Quality Impacts under the California Environmental Quality Act, February 2002* ("CEQA Guide"). Additionally, the model concluded operational emissions of ROG would exceed 128 lbs/day and NOx would be less than 8 lbs/day. The estimated daily amount of operational ROG emissions likewise exceeds the 82 lbs/day threshold. Therefore, mitigation is required for both construction and operational ROG emissions.

The majority of the construction ROG emissions occur during the Architectural Coatings phase. CalEEMod uses a default of 250 g/L ROG content for coatings (paints). The applicant proposes to limit the VOC content to 150 g/L, consistent with the Air Resources Board's Suggested Control Measure (SCM) from 2007. AQMD plans to adopt the SCM into Rule 215 Architectural Coatings by January 1, 2018. After revising the ROG content to 150 g/L and rerunning the model, the estimated emissions drop to less than 77 lbs/day. Therefore, a mitigation measure requiring a maximum ROG content of all paints at 150 g/L must be applied to the project (Condition #3 below).

The majority of the operational ROG emissions come from the use of wood burning devices. The applicant proposes removing wood burning devices from the project. As a result of this mitigation, the estimated emissions drop to less than 4 lbs/day. Therefore, a mitigation measure prohibiting wood burning devices must be applied to the project (Condition #8 below).

Finally, the estimated Greenhouse Gas (GHG) emissions during the construction phase are approximately 424 metric tons of CO₂ equivalents per year (MTCO₂e/yr) and approximately 845 MTCO₂e/yr. Both of these rates are below the Sacramento Regional GHG Thresholds for annual construction and operational emissions of GHG of 1,100 MTCO₂e/yr. Since data from projects in El Dorado County, along with the other counties in the Sacramento region, were used to develop these thresholds, it is AQMD's opinion that these regional GHG thresholds represent "substantial evidence" for CEQA purposes and are appropriate for use as CEQA thresholds of significance. The CalEEMod model estimates that both construction and operational GHG emissions would be less than significant based on this threshold.

Future Development:

The following standard conditions would apply to the proposed project:

1. Fugitive Dust: The project construction will involve grading and excavation operations, which will result in a temporary negative impact on air quality with regard to the release of particulate matter (PM₁₀) in the form of dust. The project shall adhere to the regulations and mitigation measures for fugitive dust emissions during the construction process. In addition, a Fugitive Dust Mitigation Plan (DMP) Application with appropriate fees shall be submitted to and approved by the AQMD prior to start of project construction if a Grading Permit is required from the Building Dept. (Rules 223 and 223.1)
2. Paving: Project construction will involve road development and shall adhere to AQMD Cutback and Emulsified Asphalt Paving Materials (Rule 224).
3. Painting/Coating: The project construction will involve the application of architectural coating. The maximum Reactive Organic Gases (ROG) or Volatile Organic Compounds (VOC) of any coating/painting shall not exceed 150 g/L. The prime contractor is responsible for ensuring all coatings do not exceed this content.
4. Open Burning: Burning of wastes that result from "Land Development Clearing" must be permitted through the AQMD. Only dry vegetative waste materials originating from the property may be disposed of using an open outdoor fire (Rule 300 Open Burning).
5. Construction Emissions: During construction, all self-propelled diesel-fueled engines greater than 25 horsepower shall be in compliance with the California Air Resources Board (ARB) Regulation for In-Use Off-Road Diesel Fueled Fleets (§ 2449 et al, title 13, article 4.8, chapter 9, California Code of Regulations (CCR)). The full text of the regulation can be found at ARB's website here: <http://www.arb.ca.gov/msprog/ordiesel/ordiesel.htm> An applicability flow chart can be found here: http://www.arb.ca.gov/msprog/ordiesel/faq/applicability_flow_chart.pdf Questions on applicability should be directed to ARB at 1-866-634-3735. ARB is responsible for enforcement of this regulation.
6. New Point Source: Prior to construction/installation of any new point source emissions units (e.g., gasoline dispensing facility, emergency standby engine, etc.), Authority to Construct

applications shall be submitted to the AQMD. Submittal of applications shall include facility diagram(s), equipment specifications and emission factors. (Rule 501 and 523)

7. Portable Equipment: All portable combustion engine equipment with a rating of 50 horsepower or greater shall be registered with the California Air Resources Board (CARB). A copy of the current portable equipment registration shall be with said equipment. The applicant shall provide a complete list of heavy-duty diesel-fueled equipment to be used on this project, which includes the make, model, year of equipment, daily hours of operations of each piece of equipment.
8. Wood-burning devices: The installation of open hearth wood-burning fireplaces, woodstoves and woodstove inserts shall be prohibited. If fireplaces are desired, devices that are propane or electric designed to only accommodate propane burning or electric use are allowed.
9. Electric Vehicle Charging – Multifamily Residential (more than 17 units): Consistent with the Residential Mandatory Measures identified in the 2016 Cal Green Building Code §4.106.4.2, all multi-family residential dwellings shall have, at a minimum, at least 3 percent of the total parking spaces, but not less than one, which are capable of supporting future electric vehicle supply equipment (EVSE). Plans shall include the location(s) and type of EVSE, raceway method(s), wiring schematics and electrical calculations to verify the electrical system has sufficient capacity to simultaneously charge electric vehicles at their full rated amperage (Level 2 EVSE). Raceways to accommodate a dedicated 208/240V branch circuit shall be installed from the electrical service panel to the designated parking areas at the time of initial construction. The service panel shall provide capacity to install a minimum 40A dedicated branch circuit. Please refer to Cal Green Building Stds Code §4.106.4 for specific requirements¹:
http://www.edcgov.us/Government/Building/California_Building_Standards_in_Effect.aspx

In addition to these standard conditions, AQMD recommends the following conditions to maintain consistency with the County’s General Plan.

APPLICABLE AIR QUALITY-RELATED GENERAL PLAN POLICIES AQMD RECOMMENDATIONS & CONDITIONS

El Dorado County’s General Plan² contains two goals specifically addressing air quality: 1) Strive to achieve and maintain ambient air quality standards established by the U.S. Environmental Protection Agency and the California Air Resources Board, and 2) Minimize public exposure to toxic or hazardous air pollutants and air pollutants that create unpleasant odors. The General Plan establishes objectives and policies to guide land use development within the County to reach these goals. The General Plan policies AQMD believes are applicable to the proposed project and recommended conditions of approval are listed below:

OBJECTIVE 6.7.1: EL DORADO COUNTY CLEAN AIR PLAN

¹ Cal Green Building Code: <http://codes.iccsafe.org/app/book/content/2016%20California%20Codes/Green-2017%20Errata/Chapter%204%20Residential%20Mandatory%20Measures.pdf>

² El Dorado County General Plan: http://edcgov.us/Government/Planning/Adopted_General_Plan.aspx

Adopt and enforce Air Quality standards to reduce the health impacts caused by harmful emissions.

Policy 6.7.1.1 Improve air quality through land use planning decisions.

OBJECTIVE 6.7.2: VEHICULAR EMISSIONS

Reduce motor vehicle air pollution by developing programs aimed at minimizing congestion and reducing the number of vehicle trips made in the County and encouraging the use of clean fuels.

Policy 6.7.2.5 Upon reviewing projects, the County shall support and encourage the use of, and facilities for, alternative-fuel vehicles to the extent feasible. The County shall develop language to be included in County contract procedures to give preference to contractors that utilize low-emission heavy-duty vehicles.

The application of Condition #9 above will ensure the proposed project is consistent with this policy.

OBJECTIVE 6.7.4: PROJECT DESIGN AND MIXED USES

Encourage project design that protects air quality and minimizes direct and indirect emissions of air contaminants.

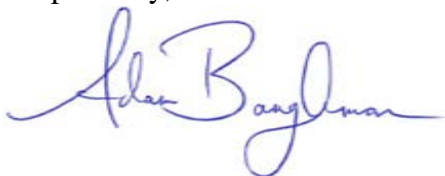
Policy 6.7.4.6 The County shall regulate wood-burning fireplaces and stoves in all new development. Environmental Protection Agency (EPA)-approved stoves and fireplaces burning natural gas or propane are allowed. The County shall discourage the use of non-certified wood heaters and fireplaces during periods of unhealthy air quality.

The application of Condition #8 above will ensure the proposed project is consistent with this policy.

AQMD Rules and Regulations are available at the following internet address:
www.edcgov.us/airqualitymanagement.

AQMD thanks you for the opportunity to comment on this proposed project. If you have any questions regarding this letter, please contact our office at (530) 621-7501.

Respectfully,



Adam Baughman
Air Quality Engineer
Air Quality Management District