

8.2 COMMENT LETTER 2: SANTA BARBARA COUNTY AIR POLLUTION CONTROL DISTRICT, FEBRUARY 21, 2013



Our Vision Clean Air

Comment Letter 2

February 21, 2013

Natasha Campbell
City of Goleta
Planning and Environmental Services
130 Cremona Drive, Ste B
Goleta, CA 93117

Re: APCD Comments on the Revised Draft Environmental Impact Report for the Marriott Residence Inn and Hollister Center Project, 12-EIR-001, 09-075-DP, -TPM and 09-079-DP AM

Dear Ms. Campbell:

The Air Pollution Control District (APCD) has reviewed the Revised Draft Environmental Impact Report (EIR) for the referenced case, which consists of the subdivision of a 10.71-acre parcel into two parcels resulting in the creation of (1) a 6.90-acre parcel known as Parcel 1, which would be designated for the existing Hollister Center development, and (2) a 3.81-acre parcel known as Parcel 2, which would be designed for development of a Marriott Residence Inn. Once subdivided, the applicant also intends to amend the existing Development Plan for Parcel 1 and implement a new Development Plan for Parcel 2. The Marriott Residence Inn is proposed to be a 80,945 square foot, 118-room, extended stay hotel with 122 parking spaces and a swimming pool. Grading associated with the proposed project is estimated to include 700 cubic yards of cut and 17,800 cubic yards of fill. The subject property, a 10.71-acre parcel zoned Industrial Research Park (M-RP) with Hotel Overlay and identified in the Assessor Parcel Map Book as APN 073-050-020, is located at 6300-6370 Hollister Avenue in the City of Goleta.

2-1 | The applicant has indicated that the proposed project will not include an emergency/standby generator. If such equipment is considered in the future as part of the project, suggested condition 2 listed below would be applicable.

Air Pollution Control District staff offers the following comment on the Revised Draft EIR:

2-2 | 1. **Section 4.6 Greenhouse Gas Emissions, Page 4.6-6:** The footnote on this pages states that *"SBCAPCD has proposed a stationary source threshold of 10,000 MT CO₂e per year."* The District has not, to date, formally proposed greenhouse gas thresholds for actions where the District is the lead agency. The District has held meetings, workshops, and has made a presentation to the District's Community Advisory Council on this issue. A formal proposal has not been brought before our Board and greenhouse gas thresholds have not been adopted by the District.

2-3 | 2. **Section 4.6 Greenhouse Gas Emissions, Page 4.6-9:** It appears from the information provided in Appendix I that the CalEEMod program was used to estimate greenhouse gas emissions from the proposed project, and the first paragraph on Page 4.6-9 of the EIR states that the CalEEMod program was used to calculate the project's operational emissions. However, the text in the last two paragraphs on this page refers to the use of URBEMIS for emission calculations. Please correct this inconsistency as necessary.

Louis D. Van Mullen, Jr. - Air Pollution Control Officer
260 North San Antonio Road, Suite A - Santa Barbara, CA 93110 - www.sbcapcd.org - 805.961.8800 - 805.961.8801 (fax)

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- 2-4 3. **Section 4.6 Greenhouse Gas Emissions, Page 4.6-10 and Appendix I:** Table 4.6-4 includes emission estimated from "Emergency Generator Testing". Emergency generator emission estimates are also detailed in Appendix I, and a reference to a 100 kW emergency diesel generator is made on page 32 and 35 of the Appendix I PDF. The project description and other discussion sections of the Draft EIR do not discuss the inclusion of an emergency generator as part of the proposed project. Through correspondence with the project planner, the applicant has since stated that an emergency generator is not proposed as part of this project.
- Air Pollution Control District staff offers the following suggested conditions:
- 2-5 1. APCD Rule 345, *Control of Fugitive Dust from Construction and Demolition Activities* establishes limits on the generation of visible fugitive dust emissions at demolition and construction sites. The rule includes measures for minimizing fugitive dust from on-site activities and from trucks moving on- and off-site. The text of the rule can be viewed on the APCD website at www.sbcapcd.org/rules/download/rule345.pdf.
- 2-6 2. Prior to occupancy, APCD permits must be obtained for all equipment that requires an APCD permit. APCD Authority to Construct permits are required for diesel engines rated at 50 bhp and greater (e.g., firewater pumps and emergency standby generators) and boilers/large water heaters whose combined heat input rating exceeds 2.0 million BTUs per hour. **Please be advised that in the case of a diesel-fired emergency generator, an equipment-specific Health Risk Assessment may be required.** If a Health Risk Assessment analysis is required, the results should be incorporated into the CEQA review for the project. The applicant should refer to APCD's website at http://www.sbcapcd.org/eng/atcm/dice/dice_atcm.htm for more information on diesel engine permitting.
- 2-7 3. All portable diesel-fired construction engines rated at 50 brake-horsepower or greater must have either statewide Portable Equipment Registration Program (PERP) certificates or APCD permits prior to operation. Construction engines with PERP certificates are exempt from APCD permit, provided they will be on-site for less than 12 months.
- 2-8 4. Small boilers and water heating units (rated between 75,000 and 2.0 million Btu/hr) must comply with the emission limits and certification requirements of APCD Rule 360. Combinations of units totaling 2.0 million Btu/hr or greater are required to obtain a District permit prior to installation. Please see www.sbcapcd.org/eng/boiler/rule360/rule_360.htm for more information and a list of certified boilers (note: any units fired on fuel(s) other than natural gas must be certified by the SBCAPCD on a case-by-case basis, even if the unit is certified when fired on natural gas).
- 2-9 5. At a minimum, prior to occupancy any feasible greenhouse gas reduction measures from the following sector-based list should be applied to the project:
- Energy use (energy efficiency, low carbon fuels, renewable energy)
 - Transportation (reduce vehicle miles traveled, compact and transit-oriented development, pedestrian- and bicycle-friendly communities)
 - Water conservation (improved practices and equipment, landscaping)
 - Waste reduction (material re-use/recycling, composting, waste diversion, waste minimization)

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cont.

- Architectural features (green building practices, cool roofs)

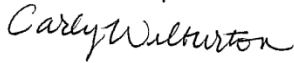
2-10

6. Asphalt paving activities shall comply with APCD Rule 329, *Cutback and Emulsified Asphalt Paving Materials*.

If you or the project applicant have any questions regarding these comments, please feel free to contact me at (805) 961-8890 or via email at cw@sbcapcd.org.

Sincerely,

2-11



Carly Wilburton,
Air Quality Specialist
Technology and Environmental Assessment Division

cc: Anthony Wrzosek, R.D. Olson Development
Project File
TEA Chron File

Response to Comment No. 2-1

This comment states that if there is an emergency or standby generator included in the project, then a permit would be required prior to occupancy (see Comment 2-4, below).

No emergency or standby generator is proposed as part of this project. Therefore, this comment is not applicable and no response is necessary.

Response to Comment No. 2-2

This comment references a footnote stating that the Santa Barbara County Air Pollution Control District (SBCAPCD) has proposed a stationary source threshold of 10,000 metric tons of carbon dioxide equivalent (MT CO₂e) per year, and states that SBCAPCD has not formally proposed greenhouse gas (GHG) thresholds.

The footnote was intended only to convey the existence of a threshold that had been proposed by SBCAPCD. However, to avoid any misunderstanding on the issue, the footnote is removed in the Final EIR.

Response to Comment No. 2-3

This comment notes a discrepancy between information in Appendix I and Section 4.6 of the Draft EIR as to whether CalEEMod or URBEMIS was used in the analysis of greenhouse gases.

Impact GHG-1, Generation of Emissions in Excess of Threshold Levels, Operations Impacts, in Section 4.6 of the Draft EIR is revised in the Final EIR as follows:

Emissions associated with electricity consumption required to transport water to the property and wastewater from the property were conservatively estimated using the projected maximum daily water use for the project identified in the prior Mitigated Negative Declaration (35,000 gallons per day) for a 140-room facility. The indirect electricity emission factor for water transport ~~was calculated using the CalEEMod emissions model, as defined in the BAAQMD CEQA guidance document and associated GHG computation plug-in for URBEMIS (BAAQMD 2010), was applied to the daily water consumption value to estimate indirect emissions for water transport.~~ Detailed emissions calculations are provided in Appendix A of the AECOM report (Appendix I).

The CalEEMod URBEMIS model was also used to calculate the GHG emissions associated with project-generated traffic and minor area source emissions including landscape maintenance. Default emissions assumptions for hotel uses were not used because the proposed project is an extended stay facility. Instead, the "All Suites Hotel" trip generation assumptions from the Institute of Traffic Engineers Trip Generation Manual, 8th Edition was utilized for both GHG calculation and traffic analysis purposes. It should be noted that both analyses assumed 100% project occupancy, even though the expected annual occupancy for the project is 87%. Therefore, expected emissions and traffic generation were both conservatively estimated (i.e., over-estimated). The CalEEMod URBEMIS files are provided in Appendix B of the AECOM report (Appendix I).

Response to Comment No. 2-4

This comment states that Appendix I, Table 4.6-4, includes emission estimates from “Emergency Generator Testing” but that the project did not discuss an emergency generator as part of the project.

In response to this comment and to correct discrepancies between Table 4.6-4 and Appendix I, Table 4.6-4 of the Draft EIR is revised in the Final EIR as follows:

**TABLE 4.6-4
QUANTITATIVE ASSESSMENT OF ESTIMATED PROJECT MITIGATED OPERATIONAL
ANNUAL GHG EMISSIONS**

Operational Scenario/Emissions Source	Emissions (MT CO ₂ e/year)
Vehicle Usage (Mobile Sources)	<u>360</u> 374
Electricity Consumption	323
Natural Gas Consumption (Space Heating)	<u>190</u>
<u>Solid Waste Disposal</u>	<u>29</u>
Energy Used for Transporting Water for Consumption by the Project	<u>7</u> 45
Marriott Shuttle Van	4
Emergency Generator Testing	4
Landscape Maintenance	<1
Projected Annual Operational CO ₂ e Emissions	<u>914</u> 938
Annual Construction Emissions Amortized over 30 Years	18
Total Amortized and Operational Emissions	<u>932</u> 956
Significance Threshold	1,100
Exceeds Significance Threshold?	NO

These revisions do not change the impact conclusion or mitigation reported in the EIR because the revised emissions are still below the 1,100 MT CO₂e threshold used in the analysis of greenhouse gas emissions.

Response to Comment No. 2-5

This comment recommends including SBCAPCD Rule 345, Control of Fugitive Dust from Construction and Demolition Activities, in the conditions of approval.

SBCAPCD Rule 345 was discussed in the Draft EIR on pages 4.2-10 and 4.2-11 and is now referenced in Mitigation Measure AQ-2a. In addition, Mitigation Measure MM AQ-2b identified dust control measures recommended by the SBCAPCD. These measures identified in MM AQ-2b are taken from Section 6.1 of the SBCAPCD’s December 2011 *Scope and Content of Air Quality Sections in Environmental Documents*, which provides guidance for assessing and mitigating air quality impacts of development projects.

Response to Comment No. 2-6

This comment recommends 1) a condition of approval requiring a SBCAPCD permit for any diesel engines rated at 50 brake-horsepower or greater, and 2) a Health Risk Assessment for the use of any diesel-fired emergency generator.

No emergency or standby generator is proposed as part of this project. Therefore, this comment is not applicable and no further response is necessary.

Response to Comment No. 2-7

This comment states that any diesel-fired construction engines rated at 50 brake-horsepower or greater must have either statewide Portable Equipment Registration Program certificates or SBCAPCD permits prior to operation.

Stationary equipment, such as generators, cranes, etc., that do not have a statewide permit under the California Air Resources Board's Portable Equipment Registration Program (PERP) would need to obtain an individual permit from the SBCAPCD. Emissions from portable equipment associated with construction activities were included in the construction analysis. If an emergency generator is proposed in the future, it will be subject to SBCAPCD permitting requirements.

No changes to the EIR are necessary in response to this comment because this requirement is state law and compliance is assumed as part of the analysis.

Response to Comment No. 2-8

This comment states that small boilers and water heating units (rated between 75,000 and 2.0 million Btu/hour) must comply with emissions limits and certification requirements of SBCAPCD Rule 360. It also states that a permit is required from the SBCAPCD if the combined units are 2.0 million Btu/hour or greater.

Section 4.2.2.3 of the EIR is revised in the Final EIR as follows to include Rule 360 in the list of SBCAPCD Rules and Regulations:

The SBCAPCD is responsible for establishing and enforcing local air quality rules and regulations that address the requirements of federal and state air quality laws. The proposed project may be subject to the following SBCAPCD rules (as well as others):

- Rule 302—Visible Emissions
- Rule 303—Nuisance
- Rule 305—Particulate Matter
- Rule 323—Architectural Coatings
- Rule 329—Cutback and Emulsified Asphalt Paving Materials
- Rule 345—Control of Fugitive Dust from Construction and Demolition Activities
- Rule 352—Natural Gas-Fired Fan-Type Central Furnaces and Small Water Heaters
- Rule 360—Emissions of Oxides of Nitrogen From Large Water Heaters and Small Boilers

Stationary construction equipment, such as emergency generators if proposed in the future, may also trigger an individual permit from the SBCAPCD.

Response to Comment No. 2-9

This comment provides a list of GHG reduction measures that are recommended for inclusion in the project.

Mitigation Measure MM GHG-1a, included in the EIR, implements Bay Area Air Quality Management District Best Management Practices for Construction related to energy use and transportation by requiring alternative fuel construction vehicles and equipment. Other GHG reduction measures included in MM GHG-1a related to waste reduction and green architecture features involve requiring that at least 10% of building materials are locally produced within 100 miles of the project site and that at least 50% of construction waste is recycled. Also, Mitigation Measure MM UTI-2b requires that the final landscape plan include measures to minimize outdoor water use, and Mitigation Measure MM UTI-2c requires that the final building plans minimize indoor water use.

These mitigation measures address the comment's recommendations for GHG reduction measures, and contribute to the conclusion that the project would not result in significant impacts related to GHG emissions.

Response to Comment No. 2-10

This comment states that the project must comply with SBCAPCD Rule 329, Cutback and Emulsified Asphalt Paving Materials.

In Section 4.2.2.3, SBCAPCD Rules and Regulations, the EIR acknowledges that the project would be subject to Rule 329, among others.

Response to Comment No. 2-11

This comment provides a contact at the SBCAPCD.

Thank you for your comments. Any follow-up questions regarding your comments will be directed to Ms. Wilburton.

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