South Coast
Air Quality Management District
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FAXED: APRIL 21, 2006

April 21, 2006

Mr. Rick Warsinski
City of Buena Park
Community Development Department
6650 Beach Boulevard,
Buena Park, CA 90622

Dear Mr. Warsinski:

Nabisco Reuse Project Draft Environmental Impact
(March 2006)

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated in the Final Environmental Impact Report.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Environmental Impact Report. The SCAQMD would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Charles Blankson, Ph.D., Air Quality Specialist – CEQA Section, at (909) 396-3304 if you have any questions regarding these comments.

Sincerely

Steve Smith, Ph.D.
Program Supervisor, CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS: CB

ORC060312-08
Control Number

Nabisco Reuse Project Draft Environmental Impact Report (DEIR)

1. **SCAQMD Permit**: On page 3-16 of the DEIR, the lead agency states that "Permitting may be required by/through the South Coast Air Quality Management District for certain equipment or land uses that may be implemented within the Project area." Please note that a permit will be required from the SCAQMD for the gasoline station component of the proposed project pursuant to SCAQMD Rule 1401 – New Source Review of Toxic Air Contaminants. The SCAQMD permit requires that an HRA be performed for the gasoline fueling station emissions. To conduct the HRA, the lead agency may use the CAPCOA Air Toxics "Hot Spots" Program Gasoline Service Station Industrywide Risk Assessment Guidelines (CAPCOA, 1997, http://www.arb.ca.gov/ab2588/riskassess.htm#list and revised Appendix E http://www.arb.ca.gov/ab2588/rrap-iwra/AppE1101.pdf). It is recommended that the risk from the VOC emissions from the proposed gas station should be presented in the Final EIR.

2. **Localized Impacts**: Consistent with the SCAQMD's environmental justice program and policies, the SCAQMD recommends that the lead agency also evaluate localized air quality impacts to nearby sensitive receptors, i.e., the multi-family residences to the east of the project site across Rostrata Avenue. SCAQMD staff recommends that for this project and for future projects, the lead agency undertake the localized analysis to ensure that all feasible measures are implemented to protect the health of nearby sensitive receptors. The methodology for conducting the localized significance thresholds analysis can be found on the SCAQMD website at: www.aqmd.gov/ceqa/handbook/LST/LST.html.

3. **CO Hot Spots**: Table 4.2-15 on page 4.2-39 shows four intersections where the weekday PM peak level of service is D or worse even after mitigation. The table also shows that the volume to capacity ratios at two of these intersections, namely Artesia Boulevard at I-5 Northbound Ramps/Firestone and Artesia Boulevard at Beach Boulevard, increase over two percent even after mitigation. The SCAQMD recommends that if a level of service at any affected intersection deteriorates from C to D or if the proposed project increases the volume to capacity ratio of any intersection rated D or worse by two percent or more, then a CO hotspots analysis may be warranted. Both of these conditions exist at these four intersections so a CO hotspots analysis is warranted for these intersections. The methodology for performing the CO hotspots analysis may be found in the Caltrans Transportation Project-Level Carbon Monoxide Protocol (CO Protocol), Revised December 1997. The CO Protocol can be downloaded from the Caltrans website at http://www.dot.ca.gov/hq/env/air/coprot.htm. Sufficient documentation should be provided in the Final EIR to allow reviewers to verify that the CO Protocol was followed correctly.

4. **Operational NO_X Mitigation Measures**: The lead agency states on page 4.3-21 of the DEIR that the proposed project's NO_X and CO emissions at buildout would exceed the significance thresholds "even if removal of the former industrial use is factored in to obtain net emissions." The lead agency notes on page 4.3-21 of the DEIR that there are no feasible measures that have been identified that can reduce these impacts to less than significant levels. Please note that there are a number of design concepts which, if incorporated into the construction of the facility, could reduce operational emissions at buildout. SCAQMD staff recommends the following construction concepts for consideration by the lead agency:

- Use light-colored roofing materials to deflect heat and conserve energy.
- Install solar panels on roofs to supply electricity for air conditioning.
- Install central water heating systems to reduce energy consumption.
- Install high energy-efficient appliances, such as water heaters, refrigerators, furnaces and boiler units.
- Use double-paned windows to reduce thermal heat.
- Install automatic lighting on/off controls and energy-efficient lighting.