



South Coast Air Quality Management District

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FAXED: JULY 22, 2005

July 22, 2005

Ms. Linda Johnson
City of Anaheim
Department of Planning
200 South Anaheim Boulevard, Suite 162
Anaheim, CA 92805

**Draft Subsequent Environmental Impact Report (DSEIR) for
The Platinum Triangle, May 2005**

Dear Ms. Reynolds:

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The SCAQMD also appreciates the additional time allowed by the lead agency for providing comments on the DSEIR for the proposed project. The following comments are meant as guidance for the Lead Agency and should be incorporated in the Final Subsequent 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 Subsequent 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

Susan Nakamura
Planning and Rules Manager
Planning, Rule Development & Area Sources

Attachment

SN:CB
ORC050603-04
Control Number

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The Platinum Triangle**

1. **Construction Emissions:** Though the lead agency indicates on page 5-34 of the DSEIR that the URBEMIS 2002 computer model output files are included in Appendix D, the construction air quality impacts were not included in the Appendix. Appendix D shows only operational emissions. The construction model runs were sent to SCAQMD staff on request. As part of the official record, and also to provide the general public the opportunity to review the construction air quality analysis, the construction model runs should also be included in the Final SEIR.
2. **Operational Emissions:** It was difficult to reconcile the proposed project's operational emission results presented in Table 5.2-7 on page 5-35 of the DSEIR with the URBEMIS output reports in Appendix D. Although the lead agency claims to have used URBEMIS 2002 to estimate the project's operational emissions, none of the URBEMIS 2002 tables in Appendix D seems to confirm the emissions estimates shown in Table 5.2-7. Furthermore, two sets of URBEMIS 2002 output files are presented for review. One set is in Appendix D and shows only operational emissions. The other set, showing both construction and operational emissions, was submitted by the lead agency's consultant in response to SCAQMD staff's request for the construction emissions file. The two sets of URBEMIS output files show different emissions estimates. Please reconcile the proposed project's operational emissions and include the correct URBEMIS 2002 output file in the Final SEIR.
3. **Project Vehicle Trips:** The traffic volumes reported in the DSEIR, the URBEMIS 2002 output files in the CD version of the DSEIR, the URBEMIS 2002 output files in the hard copy version of the DSEIR, the CALINE4 output and the intersection capacity utilization calculation sheets are all not consistent. The traffic volumes vary from a daily average of 10,308 to 208,420 to 269,878 vehicle trips. These different vehicle trips mean that the vehicle miles traveled (VMT) generated at project buildout would be inconsistent therefore resulting in incorrect or conflicting vehicle emissions. Please reconcile the traffic volumes and VMT used in the analysis to reflect actual emissions from mobile on-road sources and revise Table 5.2-7 on page 5-35 of the DSEIR accordingly for the Final SEIR.
4. **CO Hot Spots Analysis:** The eight-hour CO concentrations do not appear to be estimated correctly, based on the parameters (0.70 persistence factor, 3.9 ppm eight-hour CO background concentration, and one-hour modeled CO concentrations) presented in the SEIR.

The eight-hour CO concentration should be estimated according to the following formula:

$$\text{8-hr CO conc., ppm} = (\text{1-hr CO conc., ppm} \times \text{persistence factor}) + \text{background CO conc., ppm}$$

The Final SEIR should include the revised eight-hour CO concentrations.

5. **Construction Mitigation Measures:** Some of the mitigation measures proposed by the lead agency to reduce project emissions are ambiguous. SCAQMD staff recommends the following revisions to the language of these measures to avoid confusion or ambiguity.

Mitigation measure 5.2-1 (b) on page 5-40 of the DSEIR states that the contractor shall use low-emission mobile construction. SCAQMD staff recommends that the contractor use alternative clean fuel such as electric- or compressed natural gas-powered construction equipment with oxidation catalysts instead of gasoline- or diesel-powered engines. However, where diesel equipment has to be used because there are no practical alternatives, the construction contractor should use emulsified diesel or low sulfur diesel, as defined in SCAQMD Rule 431.2, i.e., diesel with less than 15 ppm sulfur content.

One of the mitigation measures under 5.2-2 (b) on page 5-40 states that the contractor shall maintain a minimum 12-inch freeboard ratio on haul trucks. SCAQMD staff recommends that trucks hauling dirt, sand, gravel or soil are to be covered or shall maintain at least two feet of freeboard in accordance with Section 23114 of the California Vehicle Code.

Mitigation measure 5.2-4 on page 5-41 recommends the submission of evidence that high-solids or water-based low emission paints and coatings are going to be utilized in the design and construction of buildings. To ensure that volatile organic compounds (VOC) emissions from architectural coatings do not exceed the significant threshold, SCAQMD staff recommends that the lead agency does the following: restrict the number of gallons of coatings used per day, encourage water-based coatings or other low-emitting alternatives, and also consider requiring the use of architectural coatings with a lower VOC content than 100 grams per liter. Where feasible, the paints contractor should use hand applications as well.