



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL AND USPS:

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Skim@anaheim.net

Susan Kim, Acting Planning Services Manager
City of Anaheim – Planning Department
200 S. Anaheim Blvd, MS 162
Anaheim, CA 92805

Draft Environmental Impact Report (Draft EIR) for the Proposed Ball Road Basin General Plan Amendment & Zone Change (SCH No: 2013021026)

The South Coast Air Quality Management District (SCAQMD) staff 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 into the Final EIR.

SCAQMD Staff's Summary of Project Description

The Proposed Project consists of updates to City of Anaheim General Plan land use designation for Ball Road Basin from open space to general commercial, and zoning from transitional and industrial to general commercial for 19.5 acres (Proposed Project). The Proposed Project would also add a bike path and trail study area along edges of the Basin. The Proposed Project is located on the southeast corner of Ball Road and Phoenix Club Drive. Construction of the Proposed Project is estimated to begin in 2020 over an approximate five-year period¹.

SCAQMD Staff's Summary of Air Quality Analysis

In the Air Quality section, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared those emissions to SCAQMD's regional and localized air quality CEQA significance thresholds. Based on the analyses, the Lead Agency found that the Proposed Project's construction and operational air quality impacts would be less than significant after incorporating Mitigation Measures (MM) AIR-1 through MM AIR-3².

Air Quality Analysis – Project Design Consideration: Tier 4 Construction Equipment or Better

CEQA requires that all feasible mitigation measures go beyond what is required by law to minimize any significant impacts. While MM AIR-1 is capable of reducing the Proposed Project's construction NOx emissions to less than significant, SCAQMD staff recommends that the Lead Agency revise MM AIR-1 as follows to require that all off-road diesel-powered construction equipment of 50 horsepower (hp) or greater meets or exceeds the CARB and USEPA Tier 4 off-road emissions standards during Project construction. Such equipment will be outfitted with Best Available Control Technology (BACT) devices including a CARB certified Level 3 Diesel Particulate Filters (DPF). Level 3 DPFs are capable of

¹ Draft EIR. Chapter 0.0. Page 7.

² Draft EIR. Chapter 3.2.5. Page 101-2.

achieving at least 85 percent reduction in in particulate matter emissions³. A list of CARB verified DPFs are available on the CARB website⁴.

MM AIR-1: Prior to issuance of the grading permit, the Property Owner/Developer shall require the construction contractor to use large off-road diesel equipment with a horsepower (hp) rating of ~~160~~ 50 hp or higher that meets the U.S. EPA-Certified emission standard for Tier ~~3~~ 4 off-road equipment or higher. Any model year 2006 or later off-road diesel equipment meets the Tier 3 standard. The construction contractor shall maintain on-site a list of construction equipment by type and model year. MM AIR-1 shall not apply to any equipment that is utilized on the Project site that is licensed to operate on public roadways, such as water trucks.

To ensure that Tier 4 construction equipment or better will be used during the Project construction, SCAQMD staff recommends that the Lead Agency include this requirement in applicable bid documents. Successful contractor(s) must demonstrate the ability to supply the compliant construction equipment for use prior to any ground disturbing and construction activities. A copy of each unit's certified tier specification or model year specification and CARB or SCAQMD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment. Additionally, the Lead Agency should require periodic reporting and provision of written documentation by contractors, and conduct regular inspections of the list of construction equipment by type and model year to the maximum extent feasible to ensure compliance.

Other Comments

Upon review of Table 3.2-6, *Construction-Related Criteria Pollutant Emissions*, in the Draft EIR, SCAQMD staff found two inconsistencies (see Table A). First, the total NOx emissions from the grading phase would exceed SCAQMD air quality CEQA significance threshold prior to implementation of MM AIR-1. Therefore, it should be a "Yes" to the exceedance question. Additionally, the Lead Agency stated in the Methodology Section that CalEEMod Version 2016.3.1 was used to quantify the Proposed Project's construction-related criteria pollutant emissions; however, CalEEMod Version 2011.1.1 was listed as the source. Therefore, SCAQMD staff recommends that the Lead Agency correct the inconsistencies in Table 3.2-6 in the Final EIR.

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/presentations/nov16-04_workshop.pdf.

⁴ *Ibid.* Page 18.

Table A: Copy of Table 3.2-6 Construction-Related Criteria Pollutant Emissions

Table 3.2-6 Construction-Related Criteria Pollutant Emissions

Activity	Pollutant Emissions (pounds/day)					
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Grading						
On-Site ¹	7.00	79.61	45.36	0.09	10.76	6.31
Off-Site ²	0.85	26.19	7.73	0.07	3.57	0.99
Total	7.85	105.80	53.09	0.17	14.33	7.30
Trenching						
On-Site	1.40	13.93	12.31	0.02	0.67	0.62
Off-Site	0.05	0.55	0.43	0.00	0.15	0.04
Total	1.45	14.48	12.74	0.02	0.83	0.66
Building Construction						
On-Site	1.71	15.62	16.36	0.03	0.81	0.76
Off-Site	1.29	10.82	10.08	0.05	3.63	1.01
Total	3.00	26.43	26.44	0.08	4.44	1.77
Paving						
On-Site	1.88	10.19	14.58	0.02	0.51	0.47
Off-Site	0.06	0.03	0.40	0.00	0.17	0.05
Total	1.94	10.22	14.98	0.02	0.68	0.51
Architectural Coatings						
On-Site	67.17	1.30	1.81	0.00	0.07	0.07
Off-Site	0.19	0.10	1.35	0.00	0.57	0.15
Total	67.35	1.40	3.16	0.00	0.64	0.23
SCQAMD Thresholds	75	100	550	150	150	55
Exceeds Threshold?	No	No	No	No	No	No

¹ On-site emissions from equipment not operated on public roads.

Draft EIR No. 345 Ball Road Basin General Plan Amendment & Zone Change

Activity	Pollutant Emissions (pounds/day)					
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}

² Off-site emissions from vehicles operating on public roads.

Source: CalEEMod Version 2011.1.1.

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), SCAQMD staff requests that the Lead Agency provide SCAQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful or useful to decision makers and to the public who are interested in the Proposed Project.

Susan Kim

June 15, 2018

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 if you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS/AM

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