



South Coast  
Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182  
(909) 396-2000 • www.aqmd.gov

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Mr. Jay Eastman, AICP, Senior Planner [jaye@ci.fullerton.ca.us](mailto:jaye@ci.fullerton.ca.us)  
City of Fullerton, Community Development Department  
303 West Commonwealth Avenue  
Fullerton, CA 92832

**Draft Environmental Impact Report (Draft EIR) for the Proposed Fullerton  
Transportation Corridor Specific Plan**

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 into 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 adoption of the Final Environmental Impact Report. The SCAQMD staff would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Dan Garcia, Air Quality Specialist – CEQA Section, at (909) 396-3304, if you have any questions regarding these comments.

Sincerely,

A handwritten signature in black ink that reads "Ed Eckerle".

Ed Eckerle  
Program Supervisor  
Planning, Rule Development & Area Sources

EE:DG:GM

ORC1000810-08  
Control Number

### **Air Quality Analysis - Construction**

1. Although the lead agency estimates construction air quality impacts using the URBEMIS2007 land use computer model as shown in Appendix B (Air Quality Modeling Output), basic information describing the scope for each phase is missing in the project description and in Section 4.2 Air Quality that can be used to compare with the URBEMIS output sheets. For example, the URBEMIS output sheets show 900,000 cubic feet of building area will be demolished but the number of structures and dimensions are not included in the project description or the air quality section. The project description and in Section 4.2 Air Quality does not include the total acres disturbed or the daily acres to be disturbed. While this information is found in the URBEMIS outputs, it should also be included in the Project Description to provide a check with the modeling assumptions. The amount of area being excavated for the subterranean garage, the amount of soil assumed to be carried by each truck, the number of trucks assumed to transport soil and the approximate distance to the site where the soil will be disposed should also be described. This information for the soil disturbance and other applicable phases should be included in the Final EIR.
2. On page 4.2-19, the lead agency describes the need to excavate and export approximately 20,000 cubic yards of soil but uses the default level in the URBEMIS 2007 computer modeling when estimating short-term air quality impacts. Since the default level in the URBEMIS2007 program does not account for soil hauling, it is not clear how the lead agency accounted for the fugitive dust, off- and on-road air quality impacts from hauling away the soil to the disposition site. These emission impacts should be quantified and included in the Final EIR along with the methodologies, equations and emission factors used to estimate these emissions.

### **Mitigation Measures – Construction**

3. On page 4.2-21 in the Air Quality Section, the lead agency discusses compliance with and incorporates compliance with AQMD Rule 403 – Fugitive Dust. Compliance with rules is not considered mitigation since it is required. Therefore, the lead agency should include in the Final EIR specific mitigation measures from Rule 403 the lead agency will formally adopt. Also, the lead agency should formally add any measures that were switched on when estimating mitigated construction impacts in the URBEMIS2007 modeling, i.e., watering exposed surfaces three times a day, etc. in the Final EIR.
4. Because the localized construction air quality impacts from the proposed project are estimated to exceed established daily significance thresholds for particulate matter (PM10 and PM2.5) fugitive dust, the SCAQMD recommends that the lead agency consider adding the following mitigation measures to those listed in the Air Quality Section of the Draft EIR on pages 4.2-22 through 4.23 to further reduce project construction air quality impacts, if applicable and feasible. Additional mitigation measure suggestions can also be found at [http://www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html) .

Recommended Additions:

- Water active sites at least twice daily;
- Apply water three times daily, or non-toxic soil stabilizers according to manufacturers' specifications, to all unpaved parking or staging areas or unpaved road surfaces;
- All trucks hauling dirt, sand, soil, or other loose materials are to be covered;
- Traffic speeds on all unpaved roads to be reduced to 15 mph or less;
- Pave road and road shoulders;
- Install wheel washers where vehicles enter and exit the construction site onto paved roads or wash off trucks and any equipment leaving the site each trip;
- Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more);
- Replace ground cover in disturbed areas as quickly as possible;
- Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 mph;
- Sweep streets at the end of the day if visible soil is carried onto adjacent public paved roads (recommend water sweepers with reclaimed water); and
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation.

**Mitigation Measures - Operations**

5. Because the operational regional air quality impacts from the proposed project are estimated to exceed established daily significance thresholds for volatile organic compounds (VOC), nitrogen oxide (NO<sub>x</sub>) and particulate matter (PM<sub>10</sub>), the AQMD staff recommends that the lead agency consider adding the following mitigation measures to MM 2-2 listed in the Air Quality Section of the Draft EIR on pages 4.2-24 to further reduce operational air quality impacts from the project, if applicable and feasible:

Recommended Additions:

- Improve traffic flow by signal synchronization;
- Require or provide incentives for particulate traps that meet CARB certified level 3 requirements;
- Restrict operation to alternative fueled buses, such as compressed natural gas or restrict the operation to "clean" buses, such as 2010 compliant vehicles;
- Require all vehicles and equipment to be properly tuned and maintained according to manufacturers' specifications;
- Electrify service equipment at services facilities; conduct air quality monitoring at sensitive receptors;
- Require reduction in electricity use for light rail transit by implementing the use of alternative energy, such as wind or solar power; and

- Use street sweepers that comply with SCAQMD Rules 1186 and 1186.1.

**Diesel Emissions (from Truck Activity) Proposed but No HRA or HRA deferred**

6. On page 4.2-28 in Section 4.2 Air Quality, the lead agency discusses the potential siting of sensitive receptors near an existing dry cleaners located about 180 feet from the proposed project site but does not calculate cancer risks to potential residents and other sensitive receptors from the toxic air contaminants (TAC) that might be emitted from the dry cleaner site. Rather, the lead agency defers estimating the potential risk because the proposed project design and schedule may not place residents within 300 of the existing dry cleaning site. The lead agency also cites the potential phasing out by the AQMD of the use of perchloroethylene, a source of toxic air contaminants, in dry cleaning machines by December 31, 2020 as a further reason to defer estimating potential cancer risk. Essentially, the lead agency defers demonstrating that significant health risk will not occur stating in MM 2-2 on pages 4.2-30-4.2-31 that the “Prior to the approval of a building permit for residential uses within 300 feet of the” (existing cleaners)..., “the Property Owner/Developer shall conduct a Health Risk Assessment (HRA) to demonstrate that the maximum incremental cancer risk would not exceed 10 in one million and chronic and acute health indices would be less than 1.0 if residential occupancy is proposed to start after December 31, 2020, the HRA would not be required.

AQMD staff believes that deferral of an analysis of impacts is inappropriate and inconsistent with CEQA case law (*Sundstrom v. Mendicino (1988) 202 Cal. App. 3d 296*). Toxic air contaminant may cause or contribute to an increase in mortality or serious illness, or which may pose a present or potential hazard to human health. It appears that the proposed project will expose potential sensitive receptors to toxic air contaminants that emit from the dry cleaning site. The AQMD therefore recommends that cancer risks be calculated. The AQMD has developed a methodology for estimating cancer risks from stationary sources based on AQMD Rule 1401 – New Source Review of Toxic Air Contaminants and AQMD Rule 1402 Control of Toxic Air Contaminants from Existing Sources. This information can be downloaded from the AQMD’s CEQA web pages at the following URL:

<http://www.aqmd.gov/prdas/Risk%20Assessment/RiskAssessment.html>