



South Coast
Air Quality Management District

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FAXED: AUGUST 7, 2007

August 7, 2007

Ms. Joan Wolff
City of Fullerton
Development Services Department
303 West Commonwealth Avenue
Fullerton, CA 92832

Dear Ms. Wolff:

**Draft Environmental Impact Report (DEIR) for the
St. Jude Medical Plaza Phase 2
(April 2007)**

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 to submit comments. 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 available 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

ORC070413-01
Control Number

Draft Environmental Impact Report (DEIR) for the St. Jude Medical Plaza Phase 2

1. Traffic Analysis:

The SCAQMD recommends that a CO hotspots analysis be performed for any intersection affected by the proposed project where the level of service worsens from C to D, or if a proposed project increases the volume-to-capacity ratio at any intersection rated D or worse by two percent or more. The lead agency uses the intersection capacity utilization (ICU) approach for analyzing the proposed project's effects on local intersections. According to Husch (2000)¹ the primary output from ICU is analogous to the intersection volume-to-capacity ratio. Comparing Table 3.7-1 on page 3.7-2 to Table 3.7-11 on page 3.7-35 of the DEIR appears to indicate that the volume-to-capacity increases for at least two intersections would exceed the two percent increase that would warrant a CO hotspots analysis.

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.

2. Reducing Construction VOC Emissions

Construction VOC emissions exceed the SCAQMD-recommended significance threshold of 75 pounds per day. On pages 3.2-14 and 3.2-19 of the DEIR the lead agency states that by complying with the limits imposed by SCAQMD Rules 1113 – Architectural Coatings, the VOC emissions would be reduced to less than significant.

In addition to limiting the VOC content of architectural coatings pursuant to mitigation measure AQ2-1, the lead agency should consider the following mitigation measures:

- Restrict the number of gallons of coatings used per day.
- Consider requiring the use of coatings with a lower average VOC content than 125 grams per liter.
- Consider requiring paint contractors to use hand applications instead of spray guns.
- Use pre-coated building components.

¹ Husch, David. 2000. *Intersection Capacity Utilization 2000, A Procedure for Evaluating Signalized Intersections*.
http://www.trafficware.com/assets/pdfs/ICU_2000.doc

3. PM2.5 Significance Thresholds

In response to adoption of PM2.5 ambient air quality standards by U.S. EPA and CARB, SCAQMD staff has developed a methodology for calculating PM2.5 emissions when preparing air quality analyses for California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) documents. In conjunction with the PM2.5 calculation methodology, the SCAQMD has also adopted regional and localized significance thresholds for PM2.5. To determine if PM2.5 air quality impacts are significant, please evaluate the emissions against the recommended regional and localized significance thresholds. Guidance for preparing the PM2.5 significance analysis can be found at

http://www.aqmd.gov/ceqa/handbook/PM2_5/PM2_5.html

Further, SCAQMD staff has compiled mitigation measures to be implemented if the PM2.5 impacts are determined to be significant. Mitigation measure suggestions can be found at http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html

4. URBEMIS 2007

The lead agency should be aware that URBEMIS 2007 is now available and should be used for future air quality analysis instead of URBEMIS 2002. Since the CEQA document for the proposed project was circulated for public review before URBEMIS 2007 became available in June 2007, use of URBEMIS 2002 is acceptable for this project.