



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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303 West Commonwealth Avenue

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Mitigated Negative Declaration (MND) for the Proposed Parkwest Project (Proposed Project)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The City of Fullerton is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. The following comments include recommended revisions to the CEQA regional air quality impacts analysis for construction activities that the Lead Agency should incorporate in the Final MND.

South Coast AQMD Staff's Summary of Project Information in the MND

Based on the MND, the Proposed Project consists of construction and operation of a 2.82-acre site with 286 apartment units, 124-room hotel, parking garage, and retail space.¹ The Proposed Project also demolishes a city parking structure and surface parking lot.² The Proposed Project site is located near the intersection of East Santa Fe Avenue and South Pomona Avenue in the City of Fullerton. Construction is anticipated to begin in the fourth quarter of 2023.³ Operation is expected to begin in 2025.⁴

South Coast AQMD Staff's Comments

Proposed Project's Regional Estimated Emissions (Construction)

In the Air Quality section of the MND⁵ and in Appendix A,^{6,7} the Lead Agency quantified the Proposed Project's estimated maximum daily regional construction emissions. Based on this analysis, the Lead Agency found the estimated maximum daily regional VOC construction emissions to be 90 pounds per day (lbs/day). The Lead Agency then compared the Proposed Project's VOC maximum daily regional construction emissions to South Coast AQMD's recommended daily regional air quality CEQA significance threshold for VOC, which is 75 lbs/day.⁸ When these two numbers are compared, the Proposed Project's maximum regional VOC emissions exceed South Coast AQMD's Air Quality Significance Threshold for VOCs (90 lbs/day vs. 75 lbs/day). The Lead Agency, however, states the

¹ Mitigated Negative Declaration. Proposed Development. Page 1-4.

² Appendix I. Parking Study, Local Transportation Analysis, and Vehicle Miles Traveled Analysis. Transportation Assessment Policies and Procedures (TAPP) Worksheet. Page 2 of 2.

³ Appendix A. Air Quality & Greenhouse Gas Emissions Data. CalEEMod Summer, page 8 of 31.

⁴ *Ibid.* CalEEMod Summer, page 1 of 31.

⁵ Mitigated Negative Declaration. 4.3 Air Quality. Page 4-23 through 4-24.

⁶ Appendix A. Air Quality & Greenhouse Gas Emissions Data. CalEEMod Summer. Page 6 of 31.

⁷ *Ibid.* CalEEMod Winter. Page 6 of 31.

⁸ South Coast AQMD Air Quality Significance Thresholds. Can be accessed here:

<http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>

Proposed Project's estimated maximum VOC emissions do not exceed the South Coast AQMD's Air Quality Significance Threshold for VOCs.⁹

South Coast AQMD staff recommends that the Lead Agency revise the significance impact determination for the Proposed Project's maximum VOC regional estimated emissions during construction. This revised determination should then be included in the final MND. In the event that the Proposed Project results in significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize these impacts. Any impacts resulting from mitigation measures must also be analyzed. Several resources to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project include South Coast AQMD's CEQA Air Quality Handbook,¹⁰ South Coast AQMD's Mitigation Monitoring and Reporting Plan for the 2022 Air Quality Management Plan,¹¹ and Southern California Association of Government's Mitigation Monitoring and Reporting Plan for the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy.¹²

Conclusion

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, responses should provide sufficient details 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 do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and the public who are interested in the Proposed Project.

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Evelyn Aguilar, Air Quality Specialist, at eaguilar@aqmd.gov, should you have any questions or wish to discuss the comments.

Sincerely,

Sam Wang

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⁹ Mitigated Negative Declaration. 4.3 Air Quality. Pages 4-23 through 4-24 & 4-26 through 4-27.

¹⁰ <https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>

¹¹ South Coast AQMD's 2022 Air Quality Management Plan can be found at: <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan> (Chapter 4 - Control Strategy and Implementation).

¹² Southern California Association of Governments' 2020-2045 RTP/SCS can be found at: https://www.connectsocial.org/Documents/PEIR/certified/Exhibit-A_ConnectSoCal_PEIR.pdf.