



South Coast Air Quality Management District

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**Draft Environmental Impact Report (EIR) for the
Palm/Goldenwest Specific Plan Amendment Project (Proposed Project)
(SCH No.: 2026020245)**

South Coast Air Quality Management District (South Coast AQMD) Staff appreciate the opportunity to review the above-mentioned document. The City of Huntington Beach is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD Staff have provided a brief summary of the project information and prepared the following comments which are organized by topic of concern.

Summary of Proposed Project Information in the Draft EIR

Based on the Draft EIR, the Proposed Project consists of amending the Palm/Goldenwest Specific Plan to facilitate redevelopment of a 92-acre site by:

- 1) demolishing an existing oil and gas production facility and conducting site remediation;
- 2) constructing 800 residential units, 350 hotel rooms or visitor-serving uses; and
- 3) establishing open space and park areas across three planning areas, Planning Area 1 (16 acres of commercial visitor uses), Planning Area 2 (53.2 acres of medium density residential uses), and Planning Area 3 (22.8 acres of open space and park uses).

Based on a review of aerial photographs, South Coast AQMD Staff found that the nearest sensitive receptor (e.g., single family homes) is located 58 feet east of the Proposed Project site. The Proposed Project is located at 20101 Goldenwest Street in Huntington Beach.¹

South Coast AQMD Comments

Inconsistent Construction Truck Trip and Haul Calculations

The Project description appears to contain an inconsistency in the calculation of construction haul trips. The document states that grading would require the importation of approximately 180,000

¹ Draft EIR. Page 14.

cubic yards (CY) of soil² and assumes a standard haul truck capacity of 16 cubic yards. Based on these assumptions, approximately 11,250 truckloads would be required ($180,000 \text{ CY} \div 16 \text{ CY/truck}$). Assuming 260 working days, this equates to approximately 43.3 loaded truck trips per day, or approximately 86.5 one-way truck movements per day if both the inbound and outbound movements are counted.

However, the document states that importing the 180,000 cubic yards would require 334 two-way (668 one-way) hauling truck trips per day. That number does not appear to be supported by the stated assumptions. At 334 two-way trips per day, 260 working days, and 16 CY per truck, the resulting volume would be approximately 1.39 million cubic yards, substantially greater than the stated 180,000 cubic yards.

Therefore, Lead Agency is suggested to review and clarify this discrepancy and ensure that the construction traffic and Vehicle Miles Traveled (VMT) analysis is based on accurate and consistent calculations.

Use of South Coast AQMD's Mass Rate Localized Significance Threshold (LST) Look-Up Table to Analyze the Proposed Project's Localized Air Quality Impact Should Be Consistent with LST Methodology

As indicated in Table 3-2 of the South Coast AQMD LST methodology, the LST screening tables are based on specific assumptions regarding the size of the area actively disturbed during construction, the distribution of emissions, and the distance to the nearest sensitive receptor. The screening tables are intended for projects or active construction areas of five acres or less. Therefore, the overall 92-acre project site does not, by itself, establish whether the LST screening tables are applicable. The Draft EIR should clearly disclose the maximum daily area expected to be actively disturbed during each construction phase and demonstrate that the LST screening methodology is being applied consistent with its stated applicability criteria.

In addition, the Draft EIR should evaluate whether construction activities associated with different phases of the construction schedule could overlap and occur concurrently. If overlapping construction phases occur, the emissions from concurrent construction activities should be estimated and combined when evaluating potential maximum daily localized air quality impacts.

Therefore, to ensure consistency with South Coast AQMD's LST methodology, if the maximum daily area actively disturbed during construction exceeds five acres, it is recommended that the Lead Agency to conduct project-specific dispersion modeling analysis or other refined localized air quality analysis to adequately evaluate potential localized air quality impacts. The analysis and the results should be included in the Final EIR.

Operational Volatile Organic Compounds (VOC) Emissions and Applicable South Coast AQMD and Department of Toxic Substances Control (DTSC) Requirements

² *Ibid.* Page 127.

The Draft Environmental Document states that approximately 54 percent of the total operational VOC emissions would be derived from consumer products.³ However, the document does not clearly identify or quantify the sources responsible for the remaining approximately 46 percent of operational VOC emissions. The document should specifically identify the sources contributing to this remaining percentage, particularly given that the Project site is currently developed with industrial oil and gas production uses, as well as undeveloped areas and existing access roads. This issue is particularly important because the document indicates that operational VOC emissions are high and unavoidable.⁴ If operational VOC emissions are considered high and unavoidable, the analysis should provide a clear accounting of all major VOC-emitting source categories rather than identifying only the consumer-product contribution.

Given the existing industrial oil and gas uses at the site and the potential for future development under the Proposed Project, the project should demonstrate compliance with all applicable South Coast AQMD requirements. In particular, the project should evaluate and demonstrate compliance with South Coast AQMD Rules 1166,⁵ Rule 1466,⁶ and Rule 403,⁷ as applicable. The document should identify which Project activities and equipment would be subject to each rule and describe the specific measures, permits, monitoring, and other requirements that would apply. Rule 1166 should be addressed for applicable soil-disturbing activities involving soils containing volatile organic compounds or other contaminants regulated under the rule. Rule 1466 should be addressed for applicable soil-disturbing activities involving soils containing toxic air contaminants. Rule 403 should be addressed for construction and other activities that may generate fugitive dust. Compliance with these requirements should be incorporated into the Project's enforceable requirements where applicable. Because the Project site includes existing industrial oil and gas production uses and may involve future soil disturbance and redevelopment, the environmental document, cleanup plan, and final Removal Action Workplan (RAW), as applicable, should address compliance with South Coast AQMD Rules 1166, Rule 1466, and Rule 403 and be included in the cleanup plan and final DTSC RAW.

Accordingly, we respectfully request that the Lead Agency identify and quantify all major sources of operational VOC emissions, including the remaining approximately 46 percent, and require compliance with all applicable South Coast AQMD requirements, including Rules 1166, Rule 1466, and Rule 403, with applicable requirements incorporated into the cleanup plan and final DTSC RAW.

South Coast AQMD Air Permits and Role as a Responsible Agency

If implementation of the Proposed Project would require the use of new stationary and portable sources, including but not limited to emergency generators, fire water pumps, boilers, etc., air permits from South Coast AQMD will be required. The Final EIR should include a discussion about the potentially applicable South Coast AQMD rules that may be applicable to the Proposed Project. Those rules may include, for example, Rule 201 – Permit to Construct,⁸ Rule 203 – Permit

³ *Ibid.* Page 189.

⁴ *Ibid.* Page 188.

⁵ Rule 1166 Site Specific and Various Locations Soil Mitigation Plan

⁶ Rule 1466 - Control of Particulate Emissions from Soils with Toxic Air Contaminants

⁷ Rule 403 Dust Control Information

⁸ South Coast AQMD, Rule 201 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>

to Operate,⁹ Rule 401 – Visible Emissions,¹⁰ Rule 402 – Nuisance,¹¹ Rule 403 – Fugitive Dust,¹² Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,¹³ Rule 1113 – Architectural Coatings,¹⁴ Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil,¹⁵ Regulation XIII – New Source Review,¹⁶ Rule 1401 – New Source Review of Toxic Air Contaminants,¹⁷ Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants,¹⁸ Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines,¹⁹ Rule 463 – Organic Liquid Storage,²⁰ Rule 1148.1 – Oil and Gas Production Well,²¹ Rule 1148.2 Oil and Gas Well Electronic Notification and Reporting,²² Rule 1173 Control of volatile organic compound leaks and releases from components at petroleum facilities and chemical plants,²³ etc. It is important to note that if air permits from South Coast AQMD are required, the role of South Coast AQMD would change from a Commenting Agency to a Responsible Agency under CEQA. In addition, if South Coast AQMD is identified as a Responsible Agency, per CEQA Guidelines Sections 15086, the Lead Agency is required to consult with South Coast AQMD.

CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of the process for conducting a review of the Proposed Project and issuing discretionary approvals. Moreover, it is important to note that if a Responsible Agency determines that a CEQA document is not adequate to rely upon for its discretionary approvals, the Responsible Agency must take further actions listed in CEQA Guideline Section 15096(e), which could have the effect of delaying the

⁹ South Coast AQMD, Rule 203 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>

¹⁰ South Coast AQMD, Rule 401 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf>

¹¹ South Coast AQMD, Rule 402 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>

¹² South Coast AQMD, Rule 403 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403>

¹³ South Coast AQMD, Rule 1110.2 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf

¹⁴ South Coast AQMD, Rule 1113 is available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf>

¹⁵ South Coast AQMD, Rule 1166 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>

¹⁶ South Coast AQMD, Regulation XIII is available at: <https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii>

¹⁷ South Coast AQMD, Rule 1401 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf>

¹⁸ South Coast AQMD, Rule 1466 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf>

¹⁹ South Coast AQMD, Rule 1470 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf>

²⁰ South Coast AQMD, Rule 463 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-463.pdf>

²¹ South Coast AQMD, Rule 1148.1 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1148-1.pdf>

²² South Coast AQMD, Rule 1148.2 is available at: <https://www.aqmd.gov/home/rules-compliance/compliance/1148-2>

²³ South Coast AQMD, Rule 1173 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1173.pdf>

implementation of the Proposed Project. In its role as CEQA Responsible Agency, the South Coast AQMD is obligated to ensure that the CEQA document prepared for this Proposed Project contains a sufficient project description and analysis to be relied upon in order to issue any discretionary approvals that may be needed for air permits. South Coast AQMD is concerned that the project description and analysis in its current form in the EIR is inadequate to be relied upon for this purpose.

For these reasons, the final CEQA document should be revised to include a discussion about any and all new stationary and portable equipment requiring South Coast AQMD air permits, provide the evaluation of their air quality and greenhouse gas impacts, and identify South Coast AQMD as a Responsible Agency for the Proposed Project as this information will be relied upon as the basis for the permit conditions and emission limits for the air permit(s). Please contact South Coast AQMD's Engineering and Permitting Staff at (909) 396-3385 for questions regarding what types of equipment would require air permits. For more general information on permits, please visit South Coast AQMD's webpage at <https://www.aqmd.gov/home/permits>.

Conclusion

As set forth in California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), the Lead Agency shall evaluate comments from public agencies on the environmental issues and prepare a written response at least 10 days prior to certifying the Final EIR. As such, please provide South Coast AQMD written responses to all comments contained herein at least 10 days prior to the certification of the Final EIR. In addition, as provided by CEQA Guidelines Section 15088(c), if the Lead Agency's position is at variance with recommendations provided in this comment letter, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided.

South Coast AQMD staff are available to work with the Lead Agency to ensure that impacts to air quality, GHG emissions, and health risk from the Proposed Project are accurately evaluated and mitigated to the greatest extent possible. Please contact Sahar Ghadimi, Ph.D., Air Quality Specialist, at sghadimi@aqmd.gov or me at SWang1@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

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