



South Coast Air Quality Management District

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E-MAILED:

February 11, 2011

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Draft Mitigated Negative Declaration/Finding of No Significant Impact (Draft MND/FONSI) for the Proposed I-5 High-Occupancy Vehicle (HOV) Lane Extension Project

The South Coast Air Quality Management District (AQMD) 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 CEQA document.

SCAQMD staff is concerned that the air quality impacts of this project are not adequately disclosed in the materials made available for review. The SCAQMD has developed guidelines to assist public agencies with the preparation of air quality CEQA analyses.¹ In particular, localized significance thresholds (LST's) have been developed to determine potentially significant impacts from construction activities. The project proposes construction that would include the widening of a 5.7-mile length of Interstate 5 (I-5) between Avenida Pico and San Juan Creek Road adding one high-occupancy vehicle (HOV) lane in each direction on I-5. Construction of the proposed project would begin in 2015 and be completed by 2019. In addition, the proposed project would reestablish existing auxiliary lanes and construct new auxiliary lanes, and improve several existing on- and off-ramps with the 5.7-mile freeway length. Quantification of air quality impacts from this construction were not presented in the Draft MND/FONSI, yet the lead agency determined that air quality impacts would be less than significant. SCAQMD staff encourages the lead agency to quantify any potential air quality impacts prior to making a significance determination in the Final MND/FONSI. If impacts are found to be significant, all feasible mitigation measures should be considered.

¹ www.aqmd.gov/ceqa/hdbk.html

² <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>

³ http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html

In addition to evaluating the above-mentioned air quality impacts, the AQMD recommends that the lead agency estimate localized air quality impacts to ensure that any nearby sensitive receptors are not adversely affected by the construction activities that are occurring in close proximity. It is noted under the project setting on page 1-1, Figure 1-3 in the project description and in an aerial map inspection that the area surrounding the includes residential and community facility uses, including San Clemente High School, located adjacent to the I-5 northbound (NB) off-ramp at Avenida Pico. The proposed project is located within one-quarter mile of these sensitive receptors. AQMD guidance for performing a localized air quality analysis can be found on the AQMD web page.² Should the lead agency conclude after its analyses that construction or operational localized air quality impacts exceed the AQMD daily significance thresholds, staff has compiled mitigation measures in addition to those measures listed starting on page 2.13-23 in the Air Quality Section of the Draft MND/FONSI that can be implemented if the air quality impacts are determined to be significant.³

Please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. The AQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,



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ORC110119-01
Control Number