



South Coast Air Quality Management District

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Caltrans District 8

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Draft Mitigated Negative Declaration (Draft MND) for the Proposed Interstate 215 (I-215) Bi-County High-Occupancy Vehicle (HOV) Lane Gap Closure Project

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 CEQA document.

In the project description, the lead agency proposes to construct a high-occupancy vehicle lane in each direction on Interstate 215 in Riverside County, a total length of about 7.5 miles. The HOV lanes would be constructed within the existing median and would require improvements to on- and off-ramps along the corridor. The proposed project would also require reconstruction of several bridges. Construction is scheduled to begin in the latter part of 2012 and conclude at the end of 2014.

In the Draft MND, the lead agency has analyzed air quality impacts including daily project operational PM_{2.5} and PM₁₀ impacts and localized CO impacts for 1-hour and 8-hour standards. AQMD staff is concerned, however, that the lead agency does not include a quantified estimate of emissions from construction activities for this project, as required by CEQA. Without quantifying emissions, the lead agency has not demonstrated that impacts are less than significant.

The AQMD staff recommends that the lead agency include regional and localized construction air quality impacts in the Final MND. Guidance for existing air quality models that can assist in estimating regional air quality impacts can be found on the AQMD CEQA website.¹ Resources available to calculate these emissions include the Roadway Construction Emissions Model from the Sacramento Metropolitan AQMD and/or the calculation methodologies in Chapter 9 and the Appendix to Chapter 9 in the South Coast AQMD's CEQA Air Quality Handbook.²

The AQMD staff also recommends that the lead agency evaluate localized construction air quality impacts since it is noted under Sensitive Receptors on page 24 and in Figure 1.3 of the Draft MND, that several residences and the Grand Terrace Elementary School located on Barton Road are located adjacent to portions of I-215. Therefore, AQMD staff requests that the lead agency evaluate localized air quality impacts³ to ensure that any

nearby sensitive receptors located within one-quarter mile of the project site are not adversely affected by the construction activities that are occurring in close proximity.

Based on CEQA Guidelines §15064.7, AQMD staff recommends that the lead agency use thresholds of significance to determine the significance of any project air quality impacts. This would include thresholds that the lead agency develops, publishes, and adopts itself or utilizes from previously adopted thresholds of significance that other public agencies have developed provided that the decision to adopt such thresholds is supported by substantial evidence. AQMD staff encourages the lead agency to use the thresholds of significance that the AQMD has developed for projects within its jurisdiction and that are available on the AQMD website.

In the event that the lead agency's revised CEQA document demonstrates significant adverse air quality impacts the AQMD staff recommends that the lead agency require mitigation that could minimize or eliminate significant air quality impacts pursuant to CEQA Guidelines §15370 in addition to the measures described on page 2-15 of the Draft MND.⁴

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 air quality 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,



Ian MacMillan
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¹ AQMD website can accessed at <http://www.aqmd.gov/ceqa/>.

² The SCAQMD CEQA Air Quality Analysis Handbook is available from SCAQMD Subscription Services by calling (909) 396-3720. Supplementary guidance is also available on the SCAQMD website at: <http://www.aqmd.gov/ceqa/hdbk.html>.

³ Localized Significance Thresholds guidance can be found at: <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>

⁴ Mitigation measure suggestions can be found at http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html