



South Coast
Air Quality Management District
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**Draft Mitigated Negative Declaration (Draft MND) for the Proposed 5th Street
Widening & Improvement 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.

In the project description, the lead agency proposes widening and improvement of a total of 3.25 miles of two street segments in the cities of Highland and San Bernardino. The proposed project would result in approximately 40.2 acres of land disturbance (17,160 linear feet). Roadway improvements would include the construction of additional lanes, a tie-back wall at the SR-210/5th street interchange, installation of traffic signals and associated signal equipment, infrastructure, and other related construction. Construction is scheduled to begin in February 2013 and conclude in October 2013.

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 therefore 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

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>.

The AQMD staff also recommends that the lead agency evaluate localized construction air quality impacts³ since it is noted under Sensitive Receptors on page 32 and in Figure 2b of the Draft MND, that several residences are located at various points along the proposed street segments. Therefore, AQMD staff requests that the lead agency evaluate localized air quality impacts 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 §15074 in addition to the measures described on page 29 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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IM:GM

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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.