



South Coast  
Air Quality Management District  
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E-mailed: January 6, 2012  
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Division of Environmental Planning  
Department of Transportation, District 7  
Los Angeles, CA 90012

**Review of the Draft Environmental Impact Report (EIR) for the  
Interstate 10 HOV Lane from Puente Avenue to State Route 57/71 Project**

The South Coast Air Quality Management District (AQMD) staff appreciates the opportunity to comment on the above mentioned document. The AQMD staff is concerned that the Draft EIR provides an inadequate air quality analysis for the proposed project. As a result, the air quality impacts may be understated in the Draft EIR and potentially significant impacts may not have been disclosed to the public. Further, AQMD staff notes that the lead agency did not provide the technical appendices to the Draft EIR for staff review pursuant to CEQA 15147. Specifically, On January 5, 2011 the AQMD staff requested the air quality report referenced in the Draft EIR, however, the lead agency did not respond to this request. Further, AQMD staff notes that contrary to Public Resources Code 21080.4, we did not receive the Notice of Preparation (NOP). Had we received the NOP, we would have asked that all technical appendices be sent along with the Draft EIR (as our standard practice) at that time. Therefore, AQMD staff did not have an opportunity to conduct a complete review of the air quality analysis for the aforementioned project. Based on the information provided in the Draft EIR the AQMD staff has the following comments.

**Regional Construction Air Quality Impacts**

The lead agency did not adequately address the project's construction related air quality impacts and generally concludes that the project will have insignificant air quality impacts. Specifically, the lead agency does not quantify the project's construction related emissions and provides general non-substantive information regarding the construction phase of the project to reach its significance determination. For example, the lead agency states that because construction activities would be temporary and would require less than five years to complete, a detailed emissions analysis is not required. Also, the lead agency states that temporary air quality impacts from construction of the proposed project are not considered adverse with the application of provisions from the Caltrans' Standard Specifications Document and the Caltrans'

Construction Manual. However, the lead agency does not provide any information on the content of these documents nor does the lead agency quantify the emissions reductions/benefits from compliance with these documents.

#### Localized Construction Air Quality Impacts

Further, the lead agency did not conduct a localized construction air quality analysis. Given that sensitive land uses (i.e., sensitive land uses) are located adjacent to the I-10 Freeway (i.e., approximately 100 feet north and 100 feet south of the proposed project) it is imperative that the lead agency conduct a localized air quality analysis to properly demonstrate and disclose any local air quality impacts to residences adjacent to the I-10 Freeway. Therefore, AQMD staff recommends that the lead agency quantify the construction emissions from the proposed project and use the AQMD's construction emissions thresholds to make a significance determination.<sup>1</sup>

#### Mitigation Measures and Project Requirements

On page 3.3-17 of the Draft EIR the lead agency states that the project's air quality impacts are not considered adverse with the application of relevant provisions from Caltrans' Standard Specifications Document and Caltrans' Construction Manual. However, because the lead agency did provide a quantitative analysis of construction emissions or construction mitigation measures/requirements it has not demonstrated that there will be any reduction in emissions through the implementation of these measures or that the project will not pose a significant impact on the environment.

Pursuant to Public Resources Code Section 21092.5, AQMD staff requests that the lead agency provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,



Ian MacMillan

Program Supervisor, CEQA Inter-Governmental Review  
Planning, Rule Development & Area Sources

Attachment

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<sup>1</sup> <http://www.aqmd.gov/ceqa/hdbk.html>