



South Coast Air Quality Management District

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March 18, 2016

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Draft Mitigated Negative Declaration (Draft MND) for the Proposed I-110 High-Occupancy Toll Lane Flyover Project

The South Coast Air Quality Management District (SCAQMD) staff 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 MND. The Project proposes to construct an elevated off-ramp structure on the northbound Interstate 110 freeway (I-110) between the 30th Street and the Figueroa Street overcrossing, located in the city of Los Angeles.

In the Air Quality Analysis, the project's air quality emissions during construction were quantified but not compared to the SCAQMD's recommended regional and localized CEQA thresholds to determine significance. In Table 5 – Summary of Construction Emissions, the maximum daily NO_x emissions are 109.2 lbs/day, which exceed the SCAQMD regional threshold of 55 lbs/day. In order to reduce the project's construction impacts, SCAQMD staff recommends that additional mitigation measures be included to reduce these impacts to a less than significant level. Additional details are included in the attachment.

The proposed project is also adjacent to sensitive land uses¹ (i.e., school to the northwest and hospital to the southeast); however, the Draft MND did not evaluate potential localized air quality impacts resulting from construction of the proposed project. Therefore, the SCAQMD staff recommends that the lead agency revise the air quality analysis to include an assessment of potential localized air quality impacts during demolition and construction of the proposed project. These potential air quality impacts should be analyzed using SCAQMD's Localized Significance Methodology².

¹ California Air Resources Board. April 2005. "Air Quality and Land Use Handbook: A Community Health Perspective." Accessed at: <http://www.arb.ca.gov/ch/landuse.htm>

² The Localized Significance Threshold (LST) methodology and Mass Rate LST Look Up Table is available at: <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>

The SCAQMD staff is available to work with the lead agency to address these concerns and any other air quality questions that may arise. Please contact Jack Cheng, Air Quality Specialist at (909) 396-2448, if you have any questions regarding these comments. We look forward to reviewing the Final MND associated with this project.

Sincerely,

Jillian Wong

Jillian Wong, Ph.D.

Program Supervisor

Planning, Rule Development & Area Sources

JW:JC

LAC160126-04

Control Number

Attachment

Additional Construction Mitigation Measures

Based on the air quality analysis in the Draft MND, the proposed Project will exceed the SCAQMD's CEQA regional construction significance thresholds for NO_x. Therefore, SCAQMD staff recommends that, pursuant to Section 15126.4 of the CEQA Guidelines, the following measures be included in the Draft MND, in addition to the measures proposed by the lead agency, in order to minimize or eliminate significant adverse air quality impacts:

- Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export) and if the lead agency determines that 2010 model year or newer diesel trucks cannot be obtained the lead agency shall use trucks that meet EPA 2007 model year NO_x emissions requirements.
- Consistent with measures that other Lead Agencies in the South Coast Air Basin (including Port of Los Angeles, Port of Long Beach, Metro and City of Los Angeles)³ have enacted, require all on-site construction equipment to meet the following:
 - All off road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
 - A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.
 - Encourage construction contractors to apply for SCAQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for SCAQMD "SOON" funds. The "SOON" program provides funds to accelerate clean up of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at the following website:
<http://www.aqmd.gov/home/programs/business/business-detail?title=off-road-diesel-engines>.
- Provide temporary traffic controls such as a flag person, during all phases of significant construction activity to maintain smooth traffic flow.
- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site.
- Reroute construction trucks away from congested streets or sensitive receptor areas.
- Improve traffic flow by signal synchronization.

For additional measures to reduce off-road construction equipment, refer to the mitigation measure tables located at the following website:

<http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>.

³ For example see the Metro Green Construction Policy at:
http://www.metro.net/projects_studies/sustainability/images/Green_Construction_Policy.pdf