



South Coast Air Quality Management District

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Review of the purpose, need and range of alternatives statement for the I-405 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 draft and final Environmental Impact Report (draft and final EIR) as appropriate. Please send the AQMD a copy of the draft EIR upon its completion. Also, please send with the draft EIR all appendices or technical documents related to the air quality analysis and electronic versions of all air quality modeling and health risk assessment files. Electronic files include spreadsheets, database files, input files, output files, etc., and do not mean Adobe PDF files. Without all files and supporting air quality documentation, the AQMD will be unable to complete its review of the air quality analysis in a timely manner. Any delays in providing all supporting air quality documentation will require additional time for review beyond the end of the comment period.

Given the description of the proposed project and the project alternatives AQMD staff is concerned about the potential regional air quality impacts from the proposed project and the potential localized and health risk impacts to sensitive receptors that surround the project site. Therefore, AQMD staff would like to remind the lead agency that it should identify all potential air quality impacts from the proposed project including: regional construction and operational air quality impacts, localized construction and operational air quality impacts and any health risk impacts from the project. In the event that the lead agency's draft EIR demonstrates that any criteria pollutant emissions from the regional and/or localized emissions analysis and health risk analysis create significant adverse impacts the AQMD recommends that the lead agency require mitigation pursuant to CEQA Guidelines §15370, which could minimize or eliminate significant adverse air quality impacts.

AQMD staff provided the lead agency with a response to the Notice of Preparation for the I-405 Improvement Project on September 10, 2009. In this response AQMD staff provided the lead agency with specific guidance to analyze air quality and health risk impacts from the proposed project. AQMD staff strongly recommends that the lead agency use this guidance to analyze any potential air quality and health risk impacts from the proposed project. AQMD staff has reiterated the aforementioned guidance in the discussion below.

Air Quality Analysis

The AQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The AQMD recommends that the lead agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from the AQMD's Subscription Services Department by calling (909) 396-3720. Alternatively, the lead agency may wish to consider using the California Air Resources Board (CARB) approved URBEMIS 2007 Model. This model is available on the AQMD Website at: www.urbemis.com.

Regional Air Quality Impacts Analysis

The lead agency should identify any potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the analysis.

The AQMD has developed a methodology for calculating PM_{2.5} emissions from construction and operational activities and processes. In connection with developing PM_{2.5} calculation methodologies, the AQMD has also developed both regional and localized significance thresholds. The AQMD requests that the lead agency quantify PM_{2.5} emissions and compare the results to the recommended PM_{2.5} significance thresholds. Guidance for calculating PM_{2.5} emissions and PM_{2.5} significance thresholds can be found at the following internet address:

http://www.aqmd.gov/ceqa/handbook/PM2_5/PM2_5.html.

Localized Air Quality Impacts Analysis

In addition to analyzing regional air quality impacts the AQMD recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LST's can be used in addition to the recommended regional

significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a localized significance analysis by either using the LSTs developed by the AQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>.

Health Risk Impacts Analysis

In the event that the proposed project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the lead agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment (“Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis”) can be found on the AQMD’s CEQA web pages at the following internet address:

http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html. An analysis of all toxic air contaminant impacts due to the decommissioning or use of equipment potentially generating such air pollutants should also be included.

Significance Thresholds

The Protocol should clearly state the significance thresholds that will be used for the proposed project. Since the proposed project will occur wholly within the AQMD’s jurisdiction and CalTrans has not established significance thresholds, the AQMD staff recommends that CalTrans use the AQMD’s air quality significance thresholds which can be found at <http://aqmd.gov/ceqa/hdbk.html>. If CalTrans declines to use the AQMD’s significance thresholds, it is obligated as the lead agency to analyze all potential adverse impacts, make a determination of significance as required by CEQA Guidelines Section 15064, and implement feasible mitigation measures as necessary. AQMD significance thresholds can be found at:

- Regional Criteria Pollutant and Air Toxic Significance Thresholds: <http://www.aqmd.gov/ceqa/handbook/signthres.pdf>.
- NOx, CO, and PM10 Localized Significance Thresholds: <http://aqmd.gov/ceqa/handbook/LST/LST.html>.
- PM2.5 Regional and Localized Significance Thresholds: http://aqmd.gov/ceqa/handbook/OM2.5/PM2_5.html
- Greenhouse Gas Significance Thresholds: <http://aqmd.gov/ceqa/handbook/GHG/GHG.html>.

Mitigation Measures

In the event that the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate significant adverse air quality impacts. To assist the lead agency with identifying possible mitigation measures for the project, please refer to Chapter 11 of the AQMD CEQA Air Quality Handbook for sample air quality mitigation measures. Additional mitigation measures can be found on the AQMD’s CEQA web pages at the following internet

address: www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html Additionally, AQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook contain numerous measures for controlling construction-related emissions that should be considered for use as CEQA mitigation if not otherwise required. Other measures to reduce air quality impacts from land use projects can be found in the AQMD's Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. This document can be found at the following internet address:

<http://www.aqmd.gov/prdas/aqguide/aqguide.html>. In addition, guidance on siting incompatible land uses can be found in the California Air Resources Board's Air Quality and Land Use Handbook: A Community Perspective, which can be found at the following internet address: <http://www.arb.ca.gov/ch/handbook.pdf>. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. Pursuant to state CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed.

Data Sources

AQMD rules and relevant air quality reports and data are available by calling the AQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the AQMD's World Wide Web Homepage (<http://www.aqmd.gov>).

AQMD staff is willing to work with the lead agency to ensure that project-related emissions are accurately identified, categorized, and evaluated. Please call Dan Garcia, Air Quality Specialist, CEQA Section, at (909) 396-3304 if you have any questions regarding this letter.

Sincerely,



Ed Eckerle
Program Supervisor
Planning, Rule Development & Area Sources

Attachment

EE:DG

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