



# South Coast Air Quality Management District

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## **Notice of Preparation of a Draft Program Environmental Impact Report (draft EIR) for the 2012 Regional Transportation Plan**

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. The AQMD's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the draft program environmental impact report (draft EIR). Please send the AQMD a copy of the draft EIR upon its completion. Note that copies of the draft EIR that are submitted to the State Clearinghouse are not forwarded to the AQMD. Please forward a copy of the draft EIR directly to AQMD at the address in our letterhead. **In addition, please send with the draft EIR all appendices or technical documents related to the air quality and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files. These include original emission calculation spreadsheets and modeling files (not 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.**

### Regional Air Quality Goals

As stated in the recent brochure<sup>1</sup> co-authored by AQMD, SCAG and CARB, "Emissions from cars, trucks, trains, ships, aircraft and other mobile equipment account for 90 percent of key types of air pollution and about 40 percent of greenhouse gas emissions." The draft 2012 Regional Transportation Plan (draft 2012 RTP) will form the foundation for improving transportation system performance while at the same time assuring the timely attainment of air quality goals within the South Coast Air Basin. Therefore, it is critical that the lead agency place an emphasis on regional air quality goals and promote feasible projects that result in criteria pollutant emissions reductions and greenhouse gas reductions. Specifically, as part of the 2012 RTP development process, the AQMD staff urges Southern California Associate of Governments

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<sup>1</sup>Powering the Future - A Vision for Clean Energy, Clear Skies, and a Growing Economy in Southern California available at: [http://www.aqmd.gov/pubinfo/Publications/PoweringTheFuture/powering\\_the\\_future.htm](http://www.aqmd.gov/pubinfo/Publications/PoweringTheFuture/powering_the_future.htm)

(SCAG) to develop a transportation plan that goes beyond just meeting transportation emissions budgets and instead develop a plan that seeks to achieve attainment of the National Ambient Air Quality Standards (NAAQS). SCAG should include an aggressive set of transportation policies, programs, and projects that achieve the fast-approaching PM 2.5 standard by 2014 and the even more challenging 8-hour ozone deadline by 2023. While we understand there are obvious funding constraints to achieving the NAAQS, there needs to be greater public discourse on the ramifications for failing to achieve the federal air quality standards. Furthermore, to meet state and federal air quality mandates an accelerated and deliberate effort to promote near-zero and/or zero emission transportation technologies in this region are required.

#### Public Health Effects from Toxic Air Contaminants

The recently completed MATES III Study shows that diesel is by far the most dominant driver of the overall cancer risk from toxic air contaminants released in the South Coast Air Basin, contributing more than 80 percent of the estimated cancer risk. Given the growing body of evidence which shows severe, long-term health effects associated with proximity of transportation facilities and the disproportionate impact to low-income communities, the AQMD staff urges SCAG to conduct health risk assessments in advance (i.e., upon identification in the draft RTP) of siting any new transportation facilities and/or sensitive land uses within close proximity of one another. Any potential health-related impacts associated with toxic air contaminants resulting from the draft RTP must be fully disclosed and mitigated as part of the 2012 RTP final EIR. 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”) for projects that generate or attract vehicular trips, especially heavy-duty diesel-fueled vehicles, can be found on the AQMD’s CEQA web pages at: [http://www.aqmd.gov/ceqa/handbook/mobile\\_toxic/mobile\\_toxic.html](http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html).

#### Greenhouse Gas Emissions

The draft 2012 RTP will include a newly required element called the Sustainable Communities Strategy (SCS) pursuant to the requirements of SB 375. Under SB 375 SCAG is required to develop an SCS as a part of the 2012 RTP that achieves regional GHG reduction targets of 8% per capita for the planning year 2020 and 13% per capita for 2035. Further, SB 375 allows for sub-regional councils of governments in the SCAG region to develop a sub-regional SCS (and Alternative Planning Strategy if necessary) for their jurisdictions, as a result, the Orange County Council of Governments and the Gateway Cities Council of Governments have drafted SCSs. AQMD staff looks forward to SCAG’s incorporation of the sub-regional SCSs into the full 2012 RTP/SCS for further public review. Also, in the spirit of SB 375’s collaborative process in reducing greenhouse gas (GHG) emissions, we request that SCAG staff be fully transparent in the use of modeling for the regional SCS, by providing all data inputs, the model outputs, and the performance indicators used. This will help the public, AQMD staff, and ultimately CARB with the technical understanding of the methods used to quantify GHG emissions.

Available Sources of Data

AQMD rules and relevant air quality reports, data, and guidance 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 online via AQMD's webpage (<http://www.aqmd.gov>).

The AQMD is willing to work with the Lead Agency to ensure that project-related emissions are accurately identified, evaluated and appropriately mitigated. If you have any questions regarding this letter, please call Ian MacMillan, Program Supervisor, CEQA Section, at (909) 396-3244.

Sincerely,



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

IM:DG

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