



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

E-MAILED: NOVEMBER 15, 2011

November 15, 2011

Mr. Eric Dietrich, Environmental Planner, EricDiedrich@DOT.ca.gov
Caltrans District 7
100 South Main Street
Los Angeles, CA 90012

Mr. Christopher Cannon, ceqacomments@portla.org
Director of Environmental Management
Port of Los Angeles
425 S. Palos Verdes Street
San Pedro, CA 90731

**Draft Environmental Assessment/Initial Study/Mitigated Negative Declaration with
Proposed Finding of No Significant Impact (Draft EA/IS/MND/FONSI) for the
Proposed I-110/C Street Interchange Project**

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document, including with an extended review period. 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 to include a northbound off-ramp for direct access to Harry Bridges Boulevard, modification of the northbound on-ramp from C Street, realignment of Harry Bridges Boulevard, and combining the I-110 ramp terminal/C Street/Figueroa Street intersection with the John S. Gibson Boulevard/Harry Bridges Boulevard Intersection.

Project analysis does not follow AQMD guidance

AQMD staff is concerned that Caltrans has chosen to ignore AQMD guidance¹ and not conduct a localized impact analysis, both during construction and during operations. The level of analysis conducted for this project is surprising given the level of analysis that was conducted for the John S Gibson Blvd. project in June 2011, located approximately one mile away on the same freeway. In the Gibson project, the lead agency had adequate information to determine the potential impact of projects by utilizing AQMD recommended thresholds and evaluation methodologies. However in this project, the lead agency did not conduct as thorough a review on a similar project, so it is not clear that there is adequate information available to the public or decision makers about the potential significance of this project. AQMD staff strongly recommends that Caltrans follow AQMD guidance for this and all future projects that are located within our jurisdiction.

¹ <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>

As an example, in Appendix H, on the road construction model worksheet, the lead agency states that approximately 0.5 acres per day will be graded during construction. Table 2 from Appendix H states that onsite PM10 emissions from this activity are at least 4.63 pounds per day, above the AQMD recommended Localized Significance Threshold of 4 pounds per day for sensitive receptors within 25 m of the project site. These potential impacts should be fully disclosed in the Final CEQA document, and mitigation measures should be implemented to reduce these impacts to a less than significant level.²

Traffic forecast unclear

In its discussion of traffic growth starting on page 2-49, the lead agency explains its methodology to forecast traffic growth based on data from the Southern California Association of Government (SCAG) Regional Travel Demand Forecasting Model and from the Port Travel Demand Model developed for the Ports of Long Beach and Los Angeles Transportation Study in 2001. The Port Travel Demand Model included local projects including container and non-container terminal traffic growth, which were not included in the SCAG regional model. Future trip generation was estimated at the Ports of Los Angeles and Long Beach using information input into the Los Angeles Harbor Department's QuickTrip truck trip generation model. The lead agency then stated on page 2-50, that to estimate "build-conditions (traffic flow), raw 2009, 2014, and 2035 model volumes at the future Figueroa Street and John S. Gibson Boulevard/Harry Bridges Boulevard and John S. Gibson Boulevard and I-110 ramps/Yang Ming driveway intersections were manually adjusted to reflect existing and future traffic patterns." This "manual adjustment" was not explained i.e., the actual changes made, the rationale and justification for the adjustments, etc. This information should be included in the Final MND/FONSI as documentation to justify the changes and associated air quality and traffic impacts for the proposed project.

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

IM:GM
LAC111012-06
Control Number

² http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html