



# South Coast Air Quality Management District

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Division of Environmental Planning  
California Department of Transportation, District 7  
100 South Main Street, MS-16A  
Los Angeles, CA 90012

**Draft Supplemental Environmental Impact Report/Environmental Reevaluation  
(Draft SEIR/ER) for the Proposed I-5 High Occupancy Toll (HOT) Lane Project  
(SR-14 to Parker Road)**

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 CEQA/NEPA document. In the project description, the lead agency proposes the construction of a High Occupancy Toll (HOT) lane in each direction (one northbound and one southbound) rather than a previously approved HOV lane on a 13.5 mile portion between SR-14 to Parker Road near Santa Clarita. Opening year for the proposed HOT lane project is projected for 2018.

Traffic Impact Supporting Data

Throughout the Traffic Section in Chapter 3 of the Draft EIR/ER, the lead agency includes tables that compare project traffic activity levels measuring traffic level of service (LOS) and average daily traffic volumes for periods including the year 2018 no-build scenario and for the implementation of the HOT lanes in year 2035. Using these tables, the lead agency has concluded in the narration that implementation of the proposed HOT lanes would result in fewer intersections operating at LOS E or F compared with the No Build scenario in year 2035. In addition, the lead agency concludes based on the data shown in the tables that the congestion would be reduced with a decrease in travel time in the project corridor area by moving vehicles from the mixed-flow lanes into the HOT lanes. In order to review these data assumptions used for these tables, the AQMD staff requests that the supporting data be included in the Final SEIR/ER from the applicable traffic studies cited<sup>1</sup> in the Draft EIR/ER. For example, substantial evidence must be provided demonstrating that toll lanes do not increase congestion on mixed-flow lanes, especially in comparison to the already approved HOV project. Supporting evidence from other toll lane projects should be included in the expanded explanation in the Final EIR/ER.

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<sup>1</sup>Chapter 3, page 3-3: I-5 High-Occupancy Toll Lane Project Traffic Technical Report (LSA Associates, Inc., January 2013), which updates the findings of the previous traffic analysis (I-5 PA&ED HOV & Truck Lanes – SR-14 to Parker Road, Austin Foust Associates, Inc. dated October 2007 and Supplemental Traffic Data report dated May 2008).

#### Transportation Conformity/Regional Air Quality Impacts

The project will replace High Occupancy Vehicle (HOV) lanes proposed in the original EIR with High Occupancy Toll (HOT) lanes. On page 3-41 of the Draft EIR the lead agency states that the project (i.e., HOT lanes) is not included in the 2012 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS). Specifically, the 2012 RTP/SCS identifies the project as a transportation control measure that includes HOV lanes as opposed to HOT lanes.<sup>2</sup> Also, the lead agency states that the project would result in a 2% increase of traffic volume on this section of the I-5 corridor. Further, in Table 3.2.C of the Draft EIR the lead agency indicates that the project would increase both PM10 and PM2.5 emissions in the region. Therefore, the SCAQMD staff requests that the lead agency provide further clarification (including technical analyses and documentation) in the Final EIR to demonstrate that the project conforms to the 2012 RTP/SCS and will not result in significant regional air quality impacts for all criteria pollutants. The lead agency should also explain what assumptions were used to determine that surrounding area project emissions will decrease compared to no-build.

#### Climate Change Impacts

On page 4-10 (See Table 4.A and Table 4.B) of the Draft EIR the lead agency indicates that the Build Alternative is expected to result in an increase of GHG emissions, however, the lead agency does not determine the significance of these emissions. Therefore, the AQMD staff recommends that consistent with Section 15064.4 of the CEQA Guidelines the lead agency determine the significance of the project's GHG emissions impacts. Further, the AQMD staff notes that Section 15064(g) of the CEQA Guidelines provides additional clarification on GHG significance determinations and requires that "...If there is disagreement among expert opinion supported by facts over the significance of an effect on the environment, the lead agency shall treat the effect as significant and shall prepare an EIR." Therefore, the lead agency should revise the project's greenhouse gas emissions analysis to include a significance determination. If the project demonstrates a significant GHG impact the lead agency should require all feasible mitigation measures to reduce this impact.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. The SCAQMD 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.

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<sup>2</sup> See project ID 996134 on page 39 of the Transportation Conformity Analysis Appendix available at: <http://scagntp.net/MediaViewer/10935?print=true>

Mr. Ronald J. Kosinski,  
Deputy District Director

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Sincerely,

A handwritten signature in black ink, appearing to read "Ian V. MacMillan". The signature is written in a cursive, flowing style.

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

IM:GM

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