South Coast
Air Quality Management District
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**Mitigated Negative Declaration (MND) for the Interstate 15 Corridor 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.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to construct tolled express lanes on a 14.7-mile segment of Interstate 15 (I-15) between Cantu-Galleano Ranch Road and Duncan Canyon Road (Proposed Project). Specifically, the Proposed Project will include:

- Two Express Lanes in each direction between State Route (SR)-60 and SR-210;
- One Express Lane in each direction between Cantu-Galleano Ranch Road and SR-60 at the southerly end;
- One Express Lane in each direction between SR-210 and Duncan Canyon Road at the northerly end;
- One Auxiliary Lane in each direction between SR-60 and I-10; and
- One Auxiliary Lane in the NB direction between Fourth Street and Foothill Boulevard[1].

Based on a review of Figure 1-5, *Location of Access and Egress Points*, in the MND and aerial photographs, SCAQMD staff found that sensitive receptors such as residential uses are located in proximity to the Proposed Project. The Proposed Project is expected to be constructed over a 36-month period, and construction phases would be sequential and would not overlap[2].

SCAQMD Staff's Summary of Air Quality Analysis

In the Air Quality Analysis Section, the Lead Agency quantified the Proposed Project's construction emissions. However, the Lead Agency did not conduct a localized air quality analysis, operational emissions analysis, or a mobile source Health Risk Assessment (HRA). Detailed comments are included in the attachment. The attachment also includes SCAQMD staff's recommendations on additional mitigation measures to further reduce construction emissions from NOx, PM10, and PM2.5 and health impacts to sensitive receptors. Finally, the attachment recommends a discussion on how the Proposed Project will comply with SCAQMD Rule 403(e) – Additional Requirements for Large Operations.

Closing

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review

[1] MND. Pages 1-18 to 19.
[2] MND. Page 2-304.

process. Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, response should provide sufficient details giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful or useful to decision makers and to the public who are interested in the Proposed Project.

SCAQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact me at lsun@aqmd.gov if you have any questions.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources

Attachment
LS
RVC180220-01
Control Number

**ATTACHMENT**

SCAQMD's Air Quality CEQA Thresholds of Significance

1. While CEQA permits a Lead Agency to apply appropriate thresholds to determine the level of significance, the Lead Agency may not apply thresholds in a manner that precludes consideration of substantial evidence demonstrating that there may be a significant effect on the environment. Evaluation of air quality impacts, unlike some other impact areas, easily lends itself to quantification. Not only does quantification make it easier for the public and decision-makers to understand the breadth and depth of the potential air quality impacts, but it also facilitates the identification of mitigation measures required to reduce any significant adverse air quality impacts. SCAQMD's CEQA thresholds of significance for air quality provide a clear quantitative benchmark to determine the significance of a project's air quality impacts. Therefore, for most projects within the SCAQMD, SCAQMD's air quality CEQA thresholds of significance for construction and operation[3] are used to determine the level of significance of a project's air quality impacts.

   The Lead Agency quantified the maximum construction emissions for the Proposed Project's build alternative in pounds per day[4] but did not compare those emissions to SCAQMD's air quality CEQA regional significance thresholds to determine the Proposed Project's CEQA impacts[5]. The Lead Agency stated that "thresholds provided for information purposes only. Caltrans has not adopted nor recognize SCAQMD thresholds[6]." Using SCAQMD's CEQA significance thresholds would clearly identify whether the build alternative would result in significant air quality impacts under CEQA, disclose the magnitude of the impacts, facilitate the identification of feasible mitigation measures, and evaluate the level of impacts before and after mitigation measures. Therefore, SCAQMD staff recommends that the Lead Agency compare the build alternative's construction emissions to SCAQMD's regional air quality CEQA significance thresholds in the Final MND to determine the level of significance.

Localized Air Quality Impact Analysis during Construction

2. Air quality impacts from both construction (including demolition, if any) and operation activities should be calculated. For operational air quality impacts, please see Comment No. 3 below. 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).

   Based a review of aerial photographs, SCAQMD staff found that sensitive receptors are located in proximity to the Proposed Project. Sensitive receptors are people that have an increased sensitivity to air pollution or environmental contaminants. They include schools, parks and playgrounds, daycare centers, nursing homes, elderly care facilities, hospitals, and residential dwelling units. While the Lead Agency listed SCAQMD air quality localized CEQA significance thresholds for Sensitive Receptor Areas (SRAs) 32 and 33 with one-acre disturbance and a 50-meter receptor distance in Table 2-66[7], the Lead Agency did not quantify the Proposed Project's localized construction emissions in the MND. Therefore, SCAQMD staff recommends that the Lead Agency quantify the Proposed Project's localized construction emissions and disclose the localized air quality impacts in the Final MND to ensure that any nearby sensitive receptors are not adversely affected by the

[3] South Coast Air Quality Management District. March 2015. *SCAQMD Air Quality Significance Thresholds*. Accessed at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf.
[4] MND. Table 2.9.1. Page 2.9-5.
[5] *Ibid*.
[6] *Ibid.* Footnote a.
[7] *Ibid*. Footnote b.

construction activities that are occurring in close proximity. SCAQMD guidance for performing a localized air quality analysis is available on SCAQMD website[8].

Operational Air Quality Impact Analysis

3. The Lead Agency quantified the Proposed Project's construction emissions but did not conduct operational emissions impact analysis. In general, a transportation project that adds more lanes generates or attracts new or additional vehicular trips, which leads to increases in criteria pollutants and air toxics emissions. It can also lead to more disperse land use development, which in turn leads to additional vehicle travel and increases in criteria pollutants and air toxics emissions. Therefore, SCAQMD staff recommends that the Lead Agency use the good-faith effort to quantify and disclose any potential adverse air quality impacts from additional vehicle travel during implementation of the Proposed Project in the Final MND.

Mobile Source Health Risk Assessment

4. As stated above, sensitive receptors such as residential dwelling units are located in proximity to the Proposed Project. In the event that the build alternative is approved, its implementation is likely to bring traffic lanes closer to the adjacent sensitive receptors. The annual average daily traffic volume (AADT) for the Riverside County portion of the Proposed Project ranges between 148,000 vehicles to 219,000 vehicles, and the AADT for the Proposed Project's San Bernardino County portion ranges between 127,000 vehicles to 219,000 vehicles[9]. Because of the close proximity to the Proposed Project, existing and future residents would be exposed to diesel particulate matter (DPM), which is a toxic air contaminant and is also determined to be carcinogenic by the California Air Resources Board (CARB). Therefore, SCAQMD staff recommends that the Lead Agency conduct a mobile source health risk assessment (HRA)[10] in the Final MND to disclose the potential health risks to residents from vehicles including DPM-emitting diesel-fueled vehicles that will use the Proposed Project.

Additional Recommended Air Quality Mitigation Measures

5. CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse impacts. SCAQMD staff recommends incorporating the following mitigation measures in the Final MND to further reduce construction emissions from NOx, PM10, and PM2.5 and health impacts to sensitive receptors.

   a) Require the use of 2010 model year diesel haul trucks that conform to 2010 U.S. EPA truck standards or newer diesel haul trucks (e.g., material delivery trucks and soil import/export) during construction, and if the Lead Agency determines that 2010 model year or newer diesel haul trucks are not feasible, the Lead Agency shall use trucks that meet EPA 2007 model year NOx emissions requirements, at a minimum. Include this requirement as a bid or contract specification with contractors. Require periodic reporting and provision of written documents by contractors to prove and ensure compliance.

   b) Requires the use of Tier 4 emissions standards for off-road diesel-powered construction equipment with more than 50 horsepower. Include this requirement as a bid or contract

[8] South Coast Air Quality Management District. *Localized Significance Thresholds*. Accessed at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds.

[9] California Department of Transportation. *2016 Traffic Volumes on California State Highways*. Accessed at: http://www.dot.ca.gov/trafficops/census/docs/2016_aadt_volumes.pdf.

[10] South Coast Air Quality Management District. "*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*." Accessed at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis.

specification with contractors. Require periodic reporting and provisions of written documents by contractors to prove and ensure compliance.

c) Minimize idling of all construction vehicles to five minutes or less. This is consistent with the CARB's idling policy[11].

Compliance with SCAQMD Rule 403(e)

6. The Lead Agency included a discussion on general compliance with SCAQMD Rule 403 in the MND. Since construction of the Proposed Project would result in an estimated 160 acres of total disturbed soil area[12], the Proposed Project is a large operation in the South Coast Air Basin (50-acre sites or more of disturbed surface area; or daily earth-moving operations of 3,850 cubic yards or more on three days in any year). The Lead Agency is required to comply with SCAQMD Rule 403(e) – Additional Requirements for Large Operations[13], which includes requirements to provide Large Operation Notification Form 403 N, appropriate signage, additional dust control measures, and employment of a dust control supervisor that has successfully completed the Dust Control in the South Coast Air Basin training class[14]. Therefore, SCAQMD recommends that the Lead Agency include a discussion to demonstrate specific compliance with SCAQMD Rule 403(e) in the Final MND. Compliance with SCAQMD Rule 403(e) will further reduce particulate matters from the Proposed Project.

[11] California Air Resources Board. June 2009. *Written Idling Policy Guidelines*. Accessed at: https://www.arb.ca.gov/msprog/ordiesel/guidance/writtenidlingguide.pdf.

[12] MND. Page 3-17.

[13] South Coast Air Quality Management District. Rule 403(e). Page 7. Accessed at: http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf.

[14] South Coast Air Quality Management District Compliance and Enforcement Staff's contact information for Rule 403(e) Large Operations is (909) 396-2608 or by e-mail at dustcontrol@aqmd.gov.