



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Mitigated Negative Declaration (MND) for the Temescal Canyon Road Bridge and Road Realignment 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 a new four-lane bridge that is 98-feet wide (with a curb-to-curb width of 80 feet), 375 feet long, and a structure depth of 5 feet (Proposed Project). The new bridge will connect to a 696-foot long realigned roadway that will extend from 200 feet south of the bridge to Lake Street approximately 180 feet south of the current intersection¹. Based on a review of Figure 2, *Project Vicinity*, in the MND and aerial photographs, SCAQMD staff found that nearby land uses within 500 feet of the Proposed Project include vacant lands to the north, east, and west, and industrial uses to the west. According to the Road Construction Emissions Model output in Appendix B, *Air Quality Report*, to the MND, construction of the Proposed Project is expected to take approximately 16 months. "The approximate total construction area of the project is 4.04 acres with an impervious area of approximately 2.3 acres (proposed roadway pavement, bridge, and concrete slope protection near the bridge abutment)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 an operational emissions analysis. 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.

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 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.

¹ MND. Page 3.

² MND. Appendix B. Page 6.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment

LS

RVC180308-02

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 operation³ 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 in pounds per day⁴ in Appendix B but did not compare those emissions to SCAQMD's air quality CEQA regional significance thresholds to determine the Proposed Project's CEQA impacts in the main body of the MND⁵. However, under Section 3b in the main body of the MND, the Lead Agency found that the Proposed Project's construction-related air quality impacts would be less than significant after incorporating requirements under SCAQMD Rule 403⁶. To provide substantial evidence to support the less than significant finding in the main body of CEQA document, it is recommended that the Lead Agency use SCAQMD's regional air quality CEQA significance thresholds to determine the level of significance in the Final MND. Using SCAQMD's CEQA significance thresholds clearly identifies whether the Proposed Project would result in significant air quality impacts under CEQA, discloses the magnitude of the impacts, facilitates the identification of feasible mitigation measures, and evaluates the level of impacts before and after mitigation measures.

Construction Air Quality Impact Analysis

2. This comment is related to Comment No. 1. While the Lead Agency conducted the construction air quality impact analysis and disclosed the Proposed Project's maximum construction emissions in the technical appendix (Appendix B, *Air Quality Report*) to the MND, the Lead Agency did not include a detailed discussion on the Proposed Project's potential construction air quality impacts in the main body of the MND. To facilitate public review of the air quality impacts analysis, Lead Agency should include a discussion on the Proposed Project's construction impacts under Section 3b, *Air Quality*, in the main body of the Final MND.

Operational Air Quality Impact Analysis

3. The Lead Agency quantified the Proposed Project's construction emissions but did not conduct operational emissions impact analysis. Since the Proposed Project will involve construction of a four-lane bridge without demolishing the existing bridge⁷, it has the potential to generate or attract new or additional vehicular trips that will travel on the new bridge, which can lead to 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.

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. Appendix B. Table 5.1. Page 34.

⁵ *Ibid.*

⁶ MND. Page 25.

⁷ MND. Page 42.

Additional Recommended Air Quality Mitigation Measures

4. 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 that the Lead Agency incorporate the following mitigation measures to revise the existing Mitigation Measures Air-02, Air-03, and AIR-5 in the Final MND to further reduce construction emissions from NO_x, PM₁₀, and PM_{2.5}.
 - 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 NO_x 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 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 policy⁸. 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.

⁸ California Air Resources Board. June 2009. *Written Idling Policy Guidelines*. Accessed at: <https://www.arb.ca.gov/msprog/ordiesel/guidance/writtenidlingguide.pdf>.