



South Coast
Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

E-MAILED: NOVEMBER 08, 2007

November 08, 2007

Mr. Ronald J. Kosinski
Department of Transportation, District 7
Division of Environmental Planning
100 South Main Street, MS-16A
Los Angeles, CA 90012

Dear Mr. Kosinski:

**Draft Environmental Impact Statement /Environmental Impact Report (DEIS/EIR)
for the Schuyler Heim Bridge Replacement and
SR-47 Expressway Project**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The SCAQMD staff recognizes the need to replace the Schuyler Heim Bridge to address safety issues; however, this bridge replacement project will also result in increased transportation of freight and goods to and from the Ports of Los Angeles and Long Beach. The location of this project is in an area currently experiencing cancer risks in excess of 500 in a million¹. In addition, the proposed project is located within 100 feet of residences and near about ten schools.

The SCAQMD staff is concerned with the Lead Agencies disregard to recognize the health effects of diesel particulate matter. In the state of California, diesel particulate matter is classified as a toxic air contaminant for its cancer and non-cancer health effects. The California Air Resources Board (CARB) identified particulate matter (PM) from diesel-fueled engines as a toxic air contaminant (TAC) in 1998, following an exhaustive 10-year scientific assessment process. In addition, as part of the identification process, the Office of Environmental Health Hazard Assessment (OEHHA) evaluated the potential for diesel exhaust to affect human health. OEHHA found that exposure to diesel PM resulted in an increased risk of cancer and an increase in chronic non-cancer health effects including a greater incidence of cough, labored breathing, chest tightness, wheezing, bronchitis, and asthma.

¹ California Air Resources Board. April 2006. "Diesel Particulate Matter Exposure Assessment Study for the Ports of Los Angeles and Long Beach."

There are a number of studies² that show a correlation of adverse health impacts of diesel PM and proximity to roadways. CARB recommends avoiding development of urban roads with 100,000 vehicles/day, within 500 feet of sensitive land uses due to increased cancer risk from diesel PM.³ The health effects from diesel PM can and must be quantified in the DEIS/EIR. There are a variety of air dispersion models available, including but not limited to CAL3QHC and AERMOD, to conduct air dispersion modeling of mobile source emissions. The California Air Resources Board in its Staff Report for proposed regulation for Evaluation of Port Trucks and Possible Mitigation Strategies used CAL3QHC to quantify the potential nearby cancer risks to nearby receptors. Please refer to Attachment A for additional tools that are available to quantify the health risk from mobile sources.

The bridge replacement project will result in increased transportation of freight and goods to and from the Ports of Los Angeles and Long Beach. The amount of port-related truck traffic is expected to double between 2010 and 2020.⁴ In addition, proposed expansion of the Union Pacific Intermodal Container Transfer Facility and proposed development of the Burlington Northern and Santa Fe Railroad Southern California Intermodal Gateway near-dock rail yard projects will further increase truck traffic in the proposed project area. As a result, it is therefore necessary that a program to reduce emissions from port drayage trucks be in place prior to approval of the proposed Schuyler Heim Bridge project. Specifically, existence of the San Pedro Bay Ports Clean Trucks Program, to turnover heavy duty port drayage trucks to current emissions standards by 2012, should be a pre-condition of project approval. In addition, the Lead Agencies should provide funding for the San Pedro Bay Ports Clean Trucks Program as this truck program will mitigate emissions from trucks that use the Schuyler Heim Bridge and the proposed expressway.

Attachment A includes additional and more detailed comments. The SCAQMD staff believes that the DEIS/EIR is fundamentally inadequate precluding the public of a meaningful review of the potential adverse environmental impacts from the proposed project. Specifically, the DEIS/EIR is technically flawed and lacks quantification of air quality and health risks. Pursuant to CEQA Guidelines §15126.4, the DEIS/EIR must describe feasible measures which could minimize significant adverse impacts. The DEIS/EIR concludes significant impacts for construction but lacks sufficient measures to minimize significant adverse impacts. In addition, if quantifying the health risk shows a significant impact, the Lead Agencies will be required to include feasible mitigation

² Green RS, Smorodinsky S, Kim JJ, et al. Proximity of California Public Schools to Busy Roads. January 2004. *Environmental Health Perspectives* 2004; 112:61-66. Available at <http://www.ehponline.org/members/2003/6566/6566.pdf>.

Kim JJ, Smorodinsky S, Lipsett M, et al. Traffic-Related Air Pollution Near Busy Roads. The East Bay Children's Respiratory Health Study. June 2004. *Am J Respir Crit Care Med* 2004; 170:520-526.
Zhu Y, Hinds W, Kim S, Sioutas C. Concentration and Size Distribution of Ultrafine Particles Near a Major Highway. *Journal of Air & Waste Management Association*. September 2002. 52:1032-1042.

³ California Air Resources Board. April 2005. "Air Quality and Land Use Handbook: A Community Health Perspective." Accessed at <http://www.arb.ca.gov/ch/landuse.htm>

⁴ State of California, Department of Transportation. August 2007. Schuyler Heim Bridge Replacement and SR-47 Expressway Project – Draft Environmental Impact Statement/Environmental Impact Report and Section 4(f) Evaluation.

measures. The SCAQMD staff would like to remind the Lead Agencies of Section 15088.5 of the CEQA Guidelines that establishes requirements for recirculation of an EIR prior to certification. The SCAQMD would be available to work with the Lead Agencies to address these issues and any other questions that may arise. Please contact me at (909) 396-3105 if you have any questions regarding these comments.

Sincerely

A handwritten signature in black ink that reads "Susan Nakamura". The signature is fluid and cursive, with a long horizontal flourish at the end.

Susan Nakamura
Planning Manager
Planning, Rule Development & Area Sources

Attachment

SN:EK

LAC070817-03
Control Number

Attachment A
Draft Environmental Impact Statement/Environmental Impact Report (DEIS/EIR)
for the Schuyler Heim Bridge Replacement and SR-47 Expressway Project

AIR TOXIC ANALYSIS/HEALTH RISK ANALYSIS

Air toxic emissions for the proposed project were estimated for diesel PM, benzene, 1,3-butadiene, acetaldehyde, acrolein, and formaldehyde utilizing the Mobile Source Air Toxics (MSAT) Tool. However, the air quality analysis, page 3.13-22 and 23 of the DEIS/EIR states that no modeling and health risk were determined because (1) dispersion models (CALINE3 and CAL3QHC) are more accurate for predicting maximum concentrations during specific instances when time and geographic location of the project impact are known; (2) the methods of communicating MSAT health impacts in the (National Environmental Policy Act) NEPA process and general public are under development and not available for this study; and (3) lack of monitoring data. SCAQMD staff acknowledges the reasoning by the Lead Agencies with respect to NEPA. Nevertheless, for CEQA purposes, SCAQMD staff urges the Lead Agencies to include a health risk assessment (HRA) that includes air dispersion modeling, quantified health risk, and a significance determination in the Final EIS/EIR. Below is a discussion to assist the Lead Agencies in developing a HRA for the proposed project.

Dispersion Model. While CALINE3 and CAL3QHC are the current EPA regulatory models for estimating maximum CO concentrations at roadways, there are other tools that can be used to estimate health risk along roadways and projects that contain roadway and non-roadway sources like the proposed project. While acute non-carcinogenic health risk is based on maximum concentrations, as stated in the air quality analysis, it is not true for carcinogenic and chronic non-carcinogenic health risk. Carcinogenic risk is estimated based on annual average concentrations over 70 years for residential and sensitive receptors and 40 years for worker receptors. Chronic non-carcinogenic risk is also estimated based on annual average concentrations. CAL3QHCR can be used to estimate carcinogenic health risk for roadway risks.

AERMOD and ISCST3 can be used to estimate carcinogenic health risk for both roadway and non-roadway sources. AERMOD is the current EPA approved model for general air dispersion modeling. Since CAL3QHCR and AERMOD are the current EPA approved models, FHWA may request that either be used for air dispersion modeling. For CEQA modeling, SCAQMD staff recommends use of any of these models (AERMOD, ISCST3, or CAL3QHCR) or HARP, which uses ISCST3.

Health Risk Assessment (HRA). There are several guidance documents available for air dispersion modeling and HRAs: SCAQMD's Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis (http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html), both Ports of Los Angeles and Long Beach have SCAQMD approved HRA protocols, ARB has air dispersion guidance in Appendix 7 of the Diesel Risk Reduction Plan (<http://www.arb.ca.gov/diesel/documents/rppapp.htm>), and HARP can be downloaded from the ARB website at <http://www.arb.ca.gov/toxics/harp/harp.htm>.

If the SCAQMD's *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis* is used, the health risk estimates should be completed according to OEHHA's cancer potency methodology instead of the unit risk factor methodology. In addition, since the HRA would have both on-road and marine traffic elements, SCAQMD staff suggests that Lead Agencies model concentrations using a protocol similar to that used by either Port of Los Angeles or Port of Long Beach. Lead Agencies should contact FHWA and SCAQMD staff for additional assistance with developing an air dispersion and risk assessment protocol.

The air toxic analysis appears to compare the alternatives to the future No Build option instead of baseline. Significance determinations in the Final EIS/EIR should be made based on comparing the proposed project and alternatives to the baseline pursuant to CEQA Guidelines §15125(a). The Final EIS/EIR should clearly establish the baseline, and distinguish between baseline and no build options.

AIR TOXICS SIGNIFICANCE THRESHOLDS

Page 4-43 of the *Quality Impacts Technical Study*, Revised July 2007, indicates that "currently, significance criteria have not been established to evaluate the significance of air toxic emissions from individual transportation projects." This statement is not true. SCAQMD has significance thresholds for air toxic emissions independent of the project type, including transportation projects.

As mentioned above, SCAQMD staff requests that the Lead Agencies prepare a HRA to determine significance. The HRA should ultimately determine the incremental increase in health effects values due to the proposed project by estimating the net change in impacts between the proposed project and the CEQA baseline condition. The incremental health effects value should then be compared to the health risk significance thresholds, demonstrating that the proposed project will not exceed the applicable thresholds for cancer risk at Maximum Individual Cancer Risk (MICR), hazard indices or cancer burden. The MICR should not exceed 10 in one million at any receptor location, when compared to the pre-project risk. The cumulative increase in total chronic hazard index for any target organ system should not exceed 1.0 at any receptor location, when compared to the pre-project risk. The cumulative increase in total acute hazard index for any target organ system should not exceed 1.0 at any receptor location, when compared to the pre-project risk. The cumulative increase in cancer burden for any target organ shall not exceed 0.5, when compared to the pre-project risk.

AIR QUALITY ANALYSIS

Peak Daily Emissions for Construction. Table 12 on Page 4-13, Section 4.3.4.4 (Total Construction Impacts) of the *Air Quality Impacts Technical Study*, Revised July 2007 shows total daily emissions of direct and indirect emissions. The Lead Agencies should show the total direct and indirect peak daily emissions that could occur on a given day. In addition, SCAQMD staff requests that mitigated (in addition to unmitigated) peak daily emissions also be quantified and analyzed on the same table for comparison purposes to the SCAQMD daily significance thresholds in the Final EIS/EIR. By

providing this additional comparison, the magnitude of the significance from the associated construction impact can be determined.

EMFAC2002. Page 4-5 and 4-21 of the *Air Quality Impacts Technical Study*, Revised July 2007 states that the Lead Agencies used EMFAC2002 for air quality analysis. However, the State of California Air Resources Board (CARB) released EMFAC2007 in November 2006. Therefore, SCAQMD staff recommends that the Lead Agencies use the most current EMFAC2007 model in the proposed project, as emissions factors differ from EMFAC2002, providing a more conservative and approved approach to the air quality analysis.

Page 4-26 of the *Air Quality Impacts Technical Study*, Revised July 2007 states that the idling emission factors were estimated by multiplying the EMFAC2002 emission factor for three miles per hour, in grams per second, by the speed per MOBILE5 guidance. Idling emission factors should be developed using the EMFAC2007 idling emission factors instead of the three mile per hour emission factors.

Project Traffic Emissions. The Lead Agencies claim on page 3.13-12 in the DEIS/EIR that emissions from Alternatives 1 and 2 are lower than the emissions from the No Build alternative because there will be a decrease in vehicle miles traveled (VMT) in the study area for 2011, 2015 and 2030. It is not explained why building the new bridge would necessarily reduce VMT in Alternatives 1 and 2 given that there is a projected increase in vehicular traffic in the ports area whether or not the new bridge is built.

The DEIS/EIR provides traffic data including level of service, volume/capacity ratios, density and traffic flows on freeways I-710 and I-110 and on the street intersections in the study area both before and during project construction. It also provides data on changes in AM, Mid-day (MD) and PM traffic on the SR-47 and on- and off-ramps. Table 3.5-1 on page 3.5-7 of the DEIS/EIR sums up the 2003 Traffic Volumes for the study area major roadways. The table does not show the current traffic volume on the Schuyler Heim Bridge. The Lead Agencies also do not provide a similar table showing the projected traffic for 2011, 2015 and 2030 for these major roadways.

Peak Daily Emissions for Operation. Unlike construction impacts, the total operational impacts are not determined in the *Air Quality Impacts Technical Study*, Revised July 2007 or the DEIS/EIR. SCAQMD staff request that the Lead Agencies provide a detailed table showing the direct, indirect, total operational emissions on an annual basis using peak daily data for each source type/activity/project scenario in the Final EIS/EIR. The peak total daily mitigated and unmitigated operational emissions should also be compared to the 2003 baseline emissions. The incremental increase over the baseline should be compared to the SCAQMD daily significance thresholds. Furthermore, if there are overlapping emissions for construction and operations, which is possible in 2015 (construction year for the Ocean Blvd. / SR-47 Flyover) per Figure 2-3 (Project Construction Schedule), the construction and operational emissions must be combined for the overlapping years and also evaluated with regards to the baseline (no build) and the SCAQMD daily significance threshold.

Port Truck Emissions. Appendix L, Table L2: Vehicle Operational Emission Calculations (A. Project Area VMT) of the *Air Quality Impacts Technical Study*, Revised July 2007 indicates that daily vehicle miles traveled (VMT) of Port Trucks will increase by approximately 32 percent when comparing years 2003 through 2015. However, based on the Mercer 2001 cargo forecast, project cargo volume growth for the San Pedro Bay Ports (Port of Long Beach and Port of Los Angeles) have been estimated to be approximately 123 percent when comparing years 2003 through 2015.⁵ According to the San Pedro Bay Ports Rail Study Update (Rail Study) “Capacity of off-dock, near-dock, and on-dock rail yards will not meet projected demand ...so the Ports are considering additional potential projects,” which consist of the development of the Southern California International Gateway (SCIG) Project and the expansion of the Intermodal Container Transfer Facility (ICTF).⁶ Both of these projects alone are expected to more than double the TEU (Twenty-foot Equivalent Units) capacity by 3.7 million TEUs, most likely utilizing the proposed project traffic route. Also, when comparing peak truck traffic data found on Figures 3.5-3 (current or 2003) and 3.5-10 (year 2030) of the DEIS/EIR, the percentage increase range from 250 to 400%. SCAQMD staff recommends that the Lead Agencies reevaluate the Vehicle Operational Emissions calculations in the Final EIS/EIR, especially for the Port Truck VMT. The VMT estimates should be consistent with Peak scenario conditions and be consistent with industry accepted forecasted assumptions. In addition, projects that would cumulatively increase impacts such as the future SCIG and ICTF projects should also be considered when calculating the project operational emissions.

Decrease in Vehicle Emissions. Table 3.13-5 (Daily Vehicle Emissions for the Project Study Area) on Page 3.13-12 of the DEIS/EIR provides data showing a decrease in vehicle emissions for future years. The DEIS/EIR attributes the decrease in emissions over time to EPA and ARB regulations that would require cleaner fuels and cleaner engines in future years. SCAQMD staff is aware that the EMFAC 2007 model takes into account the ARB approved regulations and associated phase-ins for fuel and engine standards, however, it is appropriate that the Lead Agencies cite those regulations that would contribute to the future emission reductions. SCAQMD staff recommends that the Lead Agencies provide a descriptive list of the regulations and assumptions that would contribute to the vehicle operational emission reductions in the Final EIS/EIR.

LOCALIZED SIGNIFICANCE THRESHOLDS

The DEIS/EIR completes CO and PM10 hotspots analyses according to FHWA methodology to determine localized significance. The DEIS/EIR does not include a localized significance threshold (LST) analysis as required by SCAQMD for both construction and operational activities. The SCAQMD’s LST methodology differs from

⁵ Mercer Management Consulting, Inc. (Mercer). 2001. San Pedro Bay Long-Term Cargo Forecast Update. July.

⁶ Parsons. 2006. San Pedro Bay Ports Rail Study Update. Executive Summary. Prepared for the Port of Los Angeles and Port of Long Beach. December. Website:
http://www.portoflosangeles.org/DOC/REPORT_SPB_Rail_Study_ES.pdf

the FHWA and includes all sources that may be considered “local” to a project, such as construction equipment, which are not required to be analyzed by the FHWA hotspots analyses. Methodology for the LST analysis can be found on the SCAQMD site at <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>. The Final EIS/EIR should include an LST analysis for both construction and operation.

MITIGATION MEASURES

Construction Mitigation. The SCAQMD staff believes that there are additional mitigation measures that are feasible that the Lead Agencies are obligated to implement pursuant to CEQA Guidelines §15126.4. Therefore, SCAQMD staff recommends the following additional feasible mitigation measures be proposed for the project to assist in reducing the emissions below the daily significance thresholds:

- Harbor Craft Mitigation Measure – This measure should require all harbor craft used during the construction phase of the project to, at a minimum, have been repowered to meet the cleanest existing marine engine emission standards (in effect at the time of use) or the proposed United States Environmental Protection Agency (U.S. EPA) Tier 3 (which are proposed to be phased-in beginning 2009), whichever is cleaner. In addition, to the extent that harbor craft powered engine meeting the proposed U.S. EPA Tier 4 marine engine standards are available, these harbor craft should be used.
- On-road Truck Mitigation Measure – As part of this mitigation measure, the Lead Agencies should use the cleanest available trucks for construction. According to Figure 2-3 (Project Construction Schedule) of the DEIS/EIR, construction of the Schuyler Heim Bridge and SR-47 Expressway is expected to occur between 2009 to 2011 and construction of the Ocean Blvd./SR-47 Flyover is expected to occur during 2015. Due to the phased approach in construction, SCAQMD staff recommends that during the 2009 – 2011 construction phase, on-road trucks meet the lowest certified emissions levels, but no greater than the U.S. EPA 2007 emissions standards. In addition, during any construction occurring after 2014, construction on-road trucks should meet U.S. EPA 2010 emission standards.
- Construction Equipment Mitigation Measure – SCAQMD staff recommends that the 2009 – 2011 construction equipment should meet U.S. EPA Tier 3 emission standards in combination with highest level of CARB Verified Diesel Emission Control System (VDECS). In addition, during any construction occurring after 2014, construction equipment should meet U.S. EPA Tier 4 emission standards.
- Best Management Practices (BMPs) – In addition to mitigation measure AQ-6, prohibiting truck idling in excess of 2 minutes, the Lead Agencies should also implement a process by which to select additional BMPs to further reduce emissions during construction if it is determined that the proposed construction equipment exceed any SCAQMD significance threshold. The following types of measures should be required on construction equipment: a) use of diesel oxidation catalysts and catalyzed diesel particulate traps (certified to the highest CARB VDECS available); b) maintain equipment according to manufacturers’ specifications; c) restrict idling of construction equipment (separate measure from

AQ-6 for truck idling) to a maximum of 5 minutes per proposed CARB regulation.

Indirect Marine Vessel Emissions. Page 4-4, Section 4.5.1.1.1 (Construction Impacts) of the DEIS/EIR states that a “mitigation would be implemented and would reduce the indirect marine vessel emissions to a level that is below the SCAQMD significance threshold for construction emissions.” However, the mitigation measure is not clearly identified in the text. SCAQMD staff requests the Lead Agencies clearly identify the mitigation measure that would reduce the indirect marine vessel emission to a level that is below the SCAQMD significance threshold for construction emissions. In addition, SCAQMD staff requests that the Lead Agencies specifically define the term “marine vessel” to mean either an Ocean Going Vessel (OGV) or Harbor Craft and differentiate the “Ship Types,” accordingly.

Mitigation Measure AQ-9, Heavy Duty Truck Buyback Program. Table 4-1 of Page 4-33 of the DEIS/EIR identifies a proposed mitigation measure AQ-9, Heavy Duty Truck Buyback Program. However, limited information is provided in the table with regards to the proposed Mitigation Measure AQ-9. SCAQMD staff requests additional information be provided with regards to the implementation strategy of the mitigation measure such as the managing agency, committed funding source, funding amount, length of program, and buyback eligibility/qualification in the Final EIS/EIR. Providing commitments up front in the Final EIS/EIR is essential to the success of this mitigation measure. Moreover, SCAQMD staff requests a detailed evaluation in the Final EIS/EIR quantifying the emission reductions for this mitigation measure.

Operational Mitigation. The proposed project will result in increased transportation of freight and goods to and from the Ports of Los Angeles and Long Beach. The amount of port-related truck traffic is expected to double between 2010 and 2020.⁷ In addition, proposed expansion of the Union Pacific Intermodal Container Transfer Facility (UP ICTF) and proposed development of the Burlington Northern and Santa Fe Railroad Southern California Intermodal Gateway (BNSF SCIG) near-dock rail yard projects will more than double container capacity and truck traffic. As a result, it is therefore necessary that a program to reduce emissions from port drayage trucks be in place prior to approval of the proposed Schuyler Heim Bridge project. Specifically, existence of the San Pedro Bay Ports Clean Trucks Program, to turnover heavy duty port drayage trucks to current emissions standards by 2012, should be a pre-condition of project approval. In addition, the Lead Agencies should provide funding for the San Pedro Bay Ports Clean Trucks Program as this truck program will mitigate emissions from trucks that use the Schuyler Heim Bridge and the proposed expressway. Lastly, SCAQMD staff urges the Lead Agencies to actively participate in the CEQA process and monitor the UP ICTF expansion and BNSF SCIG near-dock rail yard projects to minimize impacts.

⁷ State of California, Department of Transportation. August 2007. Schuyler Heim Bridge Replacement and SR-47 Expressway Project – Draft Environmental Impact Statement/Environmental Impact Report and Section 4(f) Evaluation.

GREENHOUSE GAS EMISSIONS

Page 4-30 of the DEIS/EIR states “The project’s inclusion in the Regional Transportation Plan and/or Regional Transportation Improvement Program and improved traffic flow for the region would result in improved traffic flow. As a result, carbon dioxide emission should be reduced, despite what may be an increase in vehicle miles traveled (VMT).” SCAQMD staff recommends the Lead Agencies quantify the greenhouse gas emissions and provide specific data to show that the carbon dioxide emissions would be reduced as a result of the proposed project in the Final EIS/EIR.

CONFORMITY

One of the criteria for demonstrating conformity is that the design and scope of the proposed project not change from what was in the approved SCAG Regional Transportation Plan. See page 3.13-4 of the DEIS/EIR. In the section on Conformity, the Lead Agencies state on page 3.13-12 of the DEIS/EIR “The Schuyler Heim Bridge/SR-47 is consistent with the proposed 2008 RTP that will be adopted by SCAG in March 2008 with amendments to the 2006 RTIP anticipated in July/August 2008.” It adds “It is expected that changes to the project scope will be included in the draft 2008 RTP in October or November 2007 with the final RTP approval in March 2008.”

SCAQMD staff recommends the Lead Agencies provide a conformity analysis showing consistency with the adopted 2004 RTP and the 2006 RTIP (Regional Transportation Improvement Program) rather than an “anticipated” 2008 RTP and 2006 RTIP amendment. However, if the Lead Agencies insist on providing a conformity analysis with the anticipated 2008 RTP and 2006 RTIP amendment, the Lead Agencies should discuss in detail, which of the six alternatives presented in the current DEIS/EIR are included in the SCAG March 2008 RTP and any proposed changes to the original Schuyler Heim Bridge/SR-47 enhancement project. Given that each of the six alternatives have different air quality impacts, it is therefore not clear how the Lead Agencies could conclude that the proposed project is consistent with the RTP and therefore with the AQMP.

SCAQMD staff recommends the following changes as it relates to transportation conformity for the proposed project:

- All references to ISTEA and TEA-21 should be **deleted** from **both** the Environmental Impact Statement/Report and the Air Quality Impacts Technical Study and replaced with SAFETEA LU;
- ***Air Quality Impacts Technical Study***, Section 2.2.1., Regional Conformity Determination, should reflect the new RTP update cycle in accordance to SAFETEA LU;
- ***Air Quality Impacts Technical Study***, Section 2.2.1, Regional Conformity Determination, the following sentence should read as follows: “In meeting the requirements of a conformity determination, both the RTP and the RTIP must demonstrate consistency with the SIP emission budgets.” The change is deleting “and the Transportation Control Measures (TCMs).”

- *Air Quality Impacts Technical Study*, Section 2.2.1.2, Timely Implementation of Transportation Control Measures, the first sentence should also include PM2.5 SIPs.