



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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**Mitigated Negative Declaration/a Supplemental Environmental Assessment for the
State Route 55 (SR-55) Improvement Project Between Interstate 405 (I-405) and Interstate 5 (I-5)
(State Clearinghouse No.: 2015111075)**

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's 2016 Air Quality Management Plan

Adopted on March 3, 2017, the 2016 Air Quality Management Plan (2016 AQMP) is a regional blueprint for achieving air quality standards and healthful air in the South Coast Air Basin. Built upon the progress in implementing the 2007 and 2012 AQMPs, the 2016 AQMP provides a regional perspective on air quality and lays out the challenges facing the South Coast Air Basin. The most significant air quality challenge in the Basin is to reduce an additional 45 percent reduction in nitrogen oxide (NO_x) emissions in 2023 and an additional 55 percent NO_x reduction beyond 2031 levels for ozone attainment. For more information on the 2016 AQMP, please visit the SCAQMD's website, at: <http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan>.

Project Description

The Lead Agency proposes to widen SR-55 in both directions from the I-405/SR-55 interchange to the I-5/SR-55 interchange between Post Miles 6.4 and 10.3. In the prior environmental analysis, the Lead Agency evaluated four alternatives in addition to the "No Build" Alternative. The four alternatives were as follows:

1. Alternative 1: additional auxiliary lanes and southbound general-purpose lane;
2. Alternative 2: new general-purpose lanes;
3. Alternative 3: new general-purpose lanes and additional auxiliary lanes; and
4. Alternative 4: new high-occupancy vehicle (HOV) lanes and auxiliary lanes.

In response to the public comments received on these four alternatives, the Lead Agency developed Alternative 3 Modified (3M). Alternative 3M would include new HOV and general-purpose lanes and additional auxiliary lanes in each direction. The above-mentioned document focuses on the environmental analysis of Alternative 3M.

Air Quality Analysis

The SCAQMD staff has concerns about the air quality analysis. The SCAQMD staff found that the NO_x emissions shown in the MND did not support the finding that Alternative 3M's construction impacts from NO_x emissions would be less than significant. As described in the 2016 AQMP, to achieve NO_x emissions reductions in a timely manner is critical to attaining the National Ambient Air Quality Standard (NAAQS) for ozone before the 2023 and 2031 deadlines. SCAQMD is committed to attain the ozone

NAAQS as expeditiously as practicable. Therefore, the SCAQMD staff recommends mitigation measures to reduce air emissions, particularly from NOx emissions to ensure that South Coast Air Basin is on track to attain the NAAQS. Please see the attachment for more information.

Pursuant to the CEQA Guidelines Section 15074, prior to approving the project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. 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 Jack Cheng, Air Quality Specialist, CEQA IGR Section, at (909) 396-2448, if you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS:JC

ORC-170404-02

Attachment

Attachment

Air Quality Analysis

1. On page A-2 of the MND, the Lead Agency stated that construction-related emissions would not exceed the SCAQMD's CEQA regional significance thresholds for criteria pollutants. However, the emissions calculations shown in Table 2.13.4 – Peak Day Construction Emissions indicate that NOx emissions from grading during construction would be 256 pounds/day, thereby exceeding the SCAQMD's CEQA regional significance threshold of 100 pounds/day. Additionally, the emissions calculations did not account for overlapping construction phases. In the event that Alternative 3M is selected as the proposed project, the MND has likely underestimated the project's air quality impacts. The SCAQMD staff recommends that the Lead Agency correct the finding for NOx emissions from construction, include mitigation measures that could reduce NOx emissions, and account for overlapping construction phases in the Final MND.
2. In the event that Alternative 3M is selected as the proposed project, it would be sited adjacent to sensitive land uses¹ (i.e., residential dwellings north, south, east, and west of the project site). However, the MND did not evaluate potential localized air quality impacts that could result from the construction of Alternative 3M. The SCAQMD staff recommends that the Lead Agency perform localized air quality impacts using SCAQMD's Localized Significance Methodology in the Final MND.
3. Similar to the other four alternatives, Alternative 3M would widen SR-55. In the event that Alternative 3M is selected as the proposed project, it is likely to bring traffic lanes closer to the adjacent sensitive land uses. SR-55 has an average daily traffic volume of 261,600 vehicles, which includes more than 6,000 diesel trucks. Because of the close proximity to the freeway widening, existing and future residents would be exposed to diesel particulate matter, which is a toxic air contaminant. Therefore, the SCAQMD staff recommends that the Lead Agency conduct a mobile source health risk assessment (HRA)² to disclose the potential health risks to the residents from vehicles that use the freeway including diesel-fueled vehicles that emit diesel particulate matter, which the California Air Resources Board (CARB) has determined to be carcinogenic.

Compliance with SCAQMD Rule 403(e)

4. In the event that Alternative 3M is selected as the proposed project, it is considered a large operation on a 77.2-acre site (50 acres or more of disturbed surface area; or daily earth-moving operations of 3,850 cubic yards or more on three days in any year) in the South Coast Air Basin. The Lead Agency is required to comply with all SCAQMD Rule 403(e) – Additional Requirements for Large Operations³. The requirements may include, but are not limited to, Large Operation Notification (Form 403N), 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 class⁴. Therefore, the Final MND should contain a detailed description to demonstrate compliance with SCAQMD Rule 403(e).

Recommended Construction Mitigation Measures for Reducing NOx emissions

5. Based on a review of Table 2.13.4 in the MND, the SCAQMD staff found that construction emissions from Alternative 3M would exceed SCAQMD's CEQA regional significance threshold for NOx. To assist the Lead Agency in identifying measures to reduce NOx emissions from construction, the

¹ 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>

² "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>

³ SCAQMD Rule 403. Last amended June 3, 2005. Available at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf>.

⁴ SCAQMD Compliance and Enforcement Staff Contact Information for Rule 403(e) Large Operations is (909) 396-2608 or by e-mail at dustcontrol@aqmd.gov.

SCAQMD staff recommends the following construction mitigation measures that the Lead Agency should include in the Final MND:

- a. Include in all construction contracts the requirement to use 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export). In the event that that 2010 model year or newer diesel trucks cannot be obtained, provide documentation as information becomes available and use trucks that meet EPA 2007 model year NO_x emissions requirements.⁵ Additionally, consider other measures such as incentives, phase-in schedules for clean trucks, etc.
- b. Include in all construction contracts the requirement that all off-road diesel-powered construction equipment greater than 50 hp shall meet Tier 4 off-road emission standards at a minimum. In addition, if not already supplied with a factory-equipped diesel particulate filter, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. In addition, construction equipment shall incorporate, where feasible, emissions savings technology such as hybrid drives and specific fuel economy standards. In the event that any equipment required under this mitigation measure is not available, provide documentation as information becomes available. A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit at the time of mobilization of each applicable unit of equipment shall be provided.
- c. Require the use of electricity from power poles rather than temporary diesel or gasoline power generators.
- d. Provide temporary traffic controls such as a flag person, during all phases of significant construction activity to maintain smooth traffic flow.
- e. Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site.
- f. Avoid siting staging areas near sensitive receptor areas.
- g. Reroute construction trucks away from congested streets or sensitive receptor areas.
- h. Improve traffic flow by signal synchronization.

Additional Construction Mitigation Measures for Reducing PM Emissions

6. The Lead Agency should identify and incorporate additional mitigation measures to further reduce PM₁₀ and PM_{2.5} emissions from construction activities. Please see SCAQMD Rule 403⁶ – Tables 1, 2, and 3 for additional control PM control measures.

For additional measures to reduce off-road construction equipment are available on the SCAQMD website. Please refer to the mitigation measure tables located at the following website:

<http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>.

⁵ Based on a review of the California Air Resources Board's diesel truck regulations, 2010 model year diesel haul trucks should have already been available and can be obtained in a successful manner for the project construction California Air Resources Board. March 2016. Available at: <http://www.truckload.org/tca/files/ccLibraryFiles/Filename/000000003422/California-Clean-Truck-and-Trailer-Update.pdf> (See slide #23).

⁶ South Coast Air Quality Management District – Rule 403 – Fugitive Dust. Available at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf>