



# 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 Proposed State Route 73 MacArthur Boulevard Southbound Off-Ramp Improvement 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 modify the existing lane configuration on the southbound State Route (SR) 73 off-ramp to MacArthur Boulevard by widening it from one lane to two lanes (Proposed Project). The Proposed Project is intended to reduce the severity and number of collisions by modifying the existing lane configuration and signaling the off-ramp terminus. Construction is expected to occur over a period of less than five years.

### SCAQMD Staff's Comments on Air Quality Analysis

SCAQMD staff recommends that the Lead Agency provide information in the Final MND to support the conclusion that the construction-related air quality impacts are less than significant. In the air quality analysis of the MND, the Lead Agency conducted the air quality conformity analysis and found that the Proposed Project is exempted<sup>1</sup>. However, the Lead Agency did not quantify emissions from the Proposed Project's construction activities. The Lead Agency stated that a Construction Emission Report is not needed since construction activities will be less than five years<sup>2</sup>. One of the basic purposes of CEQA is to inform government decision makers and the public about the potential, significant environmental effects of proposed activities (CEQA Guidelines Section 15002(a)(1)). A mitigated negative declaration is appropriate when the Lead Agency finds that the project will not have a significant effect on the environment after incorporating mitigation measures (CEQA Guidelines Sections 15070 to 15075). Reasons to support this finding shall be documented in the initial study. Without quantifying emissions from construction activities, the MND has not made that documentation which serves as substantial evidence to support a fair argument that the construction phase of the Proposed Project would not have any adverse effects on air quality. Therefore, SCAQMD staff recommends that the Lead Agency perform and disclose Proposed Project-specific analysis of the regional and localized air quality impacts in the Final MND. The regional construction emission impacts<sup>3</sup> should be compared to SCAQMD's regional air quality CEQA significance thresholds to determine the significance of air quality impacts. Based on a review of the aerial photographs, SCAQMD staff found that sensitive receptors (residences) are located

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<sup>1</sup> MND. Page 19.

<sup>2</sup> *Ibid.* Page 19.

<sup>3</sup>Regional construction emission impacts can be estimated using the Sacramento Roadway Emissions Model <http://www.aqmd.gov/home/regulations/ceqa/air-quality-modeling> or applicable emission calculation methodologies from the SCAQMD California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 available on SCAQMD's website here: [http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993))

approximately 500 feet west of the Proposed Project. Therefore, potential localized construction-related air quality impacts from the Proposed Project should be quantified and evaluated to ensure that any nearby sensitive receptors are not adversely affected by the construction activities that are occurring in close proximity. The SCAQMD guidance for performing a localized air quality analysis can be found on the SCAQMD web page at: <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>.

#### Other Comments

SCAQMD staff has concerns about inconsistencies amongst the references included in the MND. In the Air Quality Analysis, the Lead Agency refers to “Table 2” that lists the Proposed Project as a project which is exempt from an air quality analysis; however, “Table 2” is not included in the MND<sup>4</sup>. Additionally, based on review of Chapter 5 of the MND, SCAQMD staff found that air quality technical memorandum was prepared for the Proposed Project; however, the memorandum was not included in or attached to the MND<sup>5</sup>. Finally, Table 2.1 that is listed in the Table of Contents has inconsistent title and reference in the analysis<sup>6</sup>. These inconsistencies make the Air Quality Analysis difficult to follow. Therefore, the Final MND should correct the inconsistencies and provide the information to facilitate public disclosure.

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. 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 Ryan Bañuelos, Air Quality Specialist, CEQA, at (909) 396-3479, if you have any questions.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

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<sup>4</sup> *Ibid.* Page 19.

<sup>5</sup> *Ibid.* Page 61.

<sup>6</sup> *Ibid.* Page 9, 42, and 43.