



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • [www.aqmd.gov](http://www.aqmd.gov)

SENT VIA E-MAIL AND USPS:

March 30, 2018

[D12.SR74Safety@dot.ca.gov](mailto:D12.SR74Safety@dot.ca.gov)

Gabriela Duran, Associate Environmental Planner  
Caltrans District 12, Division of Environmental Analysis  
1750 East 4<sup>th</sup> Street, Suite 100  
Santa Ana, California 92705

## **Mitigated Negative Declaration (MND) for the Proposed State Route 74 (SR-74) Safety Improvement Project**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comment is meant as guidance for the Lead Agency and should be incorporated into the Final MND.

### SCAQMD Staff's Summary of Project Description

The Proposed Project consists of roadway improvements to a segment of State Route 74 from 0.8-mile west of San Juan Hot Springs Canyon (Post Mile [PM] 11.50) to the Orange/Riverside County line (PM 16.60), excluding the San Juan Canyon Bridge (PM 13.28 to PM 13.33) (Proposed Project). Construction is expected to take approximately 23 months.

### SCAQMD Staff's Comments

The Lead Agency quantified the maximum construction emissions for the Proposed Project's build alternative in pounds per day<sup>1</sup> but did not compare those emissions to SCAQMD's air quality CEQA significance thresholds to determine the Proposed Project's CEQA impacts<sup>2</sup>. 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. 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.

One of the project features that will be incorporated into the Proposed Project is to prohibit all construction vehicles both on- and off-site from idling in excess of 10 minutes (PF-AQ-5)<sup>3</sup>. To be consistent with the California Air Resources Board's idling policy<sup>4</sup>, SCAQMD staff recommends that the Lead Agency minimize idling of all construction vehicles to five minutes or less.

### 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

---

<sup>1</sup> MND. Table 2.9.1. Page 2.9-5.

<sup>2</sup> MND. Chapter 3, *California Environmental Quality Act (CEQA) Evaluation*. Page 3-9.

<sup>3</sup> MND. Page 2.9-5.

<sup>4</sup> California Air Resources Board. June 2009. *Written Idling Policy Guidelines*. Accessed at: <https://www.arb.ca.gov/msprog/ordiesel/guidance/writtenidlingguide.pdf>.

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 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](mailto:lsun@aqmd.gov) if you have any questions.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS

ORC180306-05

Control Number