



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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Mitigated Negative Declaration (MND) for the Proposed Interstate 10 Eastbound Truck Climbing Lane Improvement Project

South Coast Air Quality Management District (South Coast AQMD) 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.

South Coast AQMD Staff's Summary of Project Description

The Lead Agency proposes to reconfigure a three-mile segment to extend the eastbound truck climbing lane on Interstate 10 (I-10) between the existing offramp at Live Oak Canyon Road within the City of Yucaipa and the existing County Line Road Eastbound offramp within the City of Calimesa (Proposed Project). Construction of the Proposed Project is expected to take approximately three years¹. Based on a review of Figure 2.17-2: *Modeled Receptor Locations* and Chapter 1: *Proposed Project, Project Setting* in the MND² and aerial photographs, South Coast AQMD staff found that sensitive receptors such as residential uses are located within 100 feet of the Proposed Project³.

Summary of the Air Quality Analysis in the MND

In the Air Quality Analysis Section, the Lead Agency quantified the Proposed Project's regional construction emissions and compared those emissions to South Coast AQMD's recommended regional air quality CEQA significance thresholds. Based on the analyses, the Lead Agency found that the Proposed Project would not cause a significant impact on regional air quality⁴.

South Coast AQMD Localized Construction Air Quality Impact Analysis

As stated above, existing residential uses are located in close proximity to the Proposed Project and will likely be exposed to construction emissions during the three-year construction period. However, the Lead Agency did not analyze the Proposed Project's localized air quality impacts in the MND. Therefore, South Coast AQMD staff recommends that the Lead Agency quantify the Proposed Project's localized emissions from construction activities and disclose them in the Final MND to ensure that any nearby sensitive receptors are not adversely affected by emissions from construction activities that are occurring in close proximity. South Coast AQMD's guidance for performing a localized air quality impact analysis is available on South Coast AQMD website⁵.

¹ MND. Page 2.18-6.

² *Ibid.* Page 2.17-7.

³ *Ibid.* Page 1-2.

⁴ *Ibid.* Page 3-8.

⁵ South Coast AQMD. *Localized Significance Thresholds*. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

Conclusion

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 South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, responses 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, informative, or useful to decision makers and the public who are interested in the Proposed Project.

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Margaret Isied, Assistant Air Quality Specialist, at misied@aqmd.gov, should you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS:MI

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