



# South Coast Air Quality Management District

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July 22, 2005

Mr. Ronald J. Kosinski, Deputy District Director  
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California Department of Transportation  
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Attn: Chris Benz-Blumberg

**Draft Initial Study/Environmental Assessment and Negative Declaration for the  
Proposed SR 126/Commerce Center Drive Interchange Project**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The SCAQMD also appreciates the additional time allowed to review the Draft ND for the proposed project and provide comments. As a commenting agency for the proposed project, the SCAQMD staff finds that the air quality analysis in the Draft ND is inadequate primarily because construction air quality impacts are not quantified, and it is likely that the air quality impacts would be significant. Therefore, the SCAQMD staff recommends that the lead agency revise the air quality analysis and quantify construction and operational impacts.

The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final Environmental Assessment. Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final Environmental Assessment.

Mr. Ronald J. Kosinski,  
Deputy District Director

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July 22, 2005

The SCAQMD staff would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

Susan Nakamura  
Planning & Rules Manager  
Planning, Rule Development & Area Sources

Attachment

SN:GM

LAC050524-03  
Control Number

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1. In Section 3.3 Air Quality in the Draft Initial Study/Environmental Assessment and Negative Declaration (Draft ND/EA), the lead agency has determined on page 3-21 that although short-term air quality impacts would cause an adverse impact, the impacts would be temporary in nature and therefore the lead agency concludes on page 3-24 that construction impacts with mitigation “will not be adverse.” The lead agency did not, however, support its conclusions by quantifying the proposed project’s construction air quality impacts or the control efficiencies of the mitigation measures proposed by the lead agency in Section 3.3.4.

Because the short-term emissions may be temporary in nature does not mean they are insignificant. For example, the attainment status of an area is based on whether or not there are daily exceedances of the applicable ambient air quality standard. Consequently, projects that exceed the SCAQMD short-term daily emissions significance thresholds from a project could potentially affect the attainment status of the area in which it is located and, therefore should be considered significant.

It is also important for the lead agency to actually quantify all project air quality impacts because although the proposed construction activities are temporary in nature, sensitive receptors such as residences located near the proposed site (see comment #3) may be exposed to emissions from fugitive dust, off- and on-road vehicles and equipment such as bull dozers, cranes, graders, loaders, water trucks, etc., architectural coatings and other emission sources listed in the project description. The SCAQMD therefore recommends that for this current project and for future projects that the lead agency quantify short-term air quality impacts.

Pursuant to CEQA Guidelines §15147, the Draft ND/EA should contain sufficient technical detail to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. Although precise information may not be available to estimate construction air quality impacts, the lead agency should make emission estimates based on reasonable assumptions regarding the construction phases and schedule, the type and size of construction equipment that are available based on the proposed project description. Therefore, the Final ND/EA should include emission estimates, emission factors, methodologies and control efficiencies for any proposed mitigation measures from the soil disturbance sources of the construction project. This information could be included in the Final ND/EA as part of the narration or as an appendix. Otherwise, the lead agency has not demonstrated that construction PM10 air quality impacts are less than significant To quantify air quality impacts, the lead agency can utilize the current CARB URBEMIS 2002 emissions model, which can be accessed at <http://www.aqmd.gov/ceqa/urbemis.html> or follow the calculation methodologies in Chapter 9 and the Appendix to Chapter 9 in the South Coast AQMD’s CEQA Air Quality Handbook.

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In the event that quantification of the construction air quality impacts from the proposed project, exceed established significance thresholds, mitigation measures may be necessary (see comment #3). In addition to identifying feasible mitigation measures, the lead agency should specify the control efficiency of each mitigation measure (if one is available) and apply the control efficiency to the total emissions estimated for the project. In this way the lead agency can quantitatively determine the significance of air quality impacts from the proposed project.

2. The lead agency on page 3-17 states that because the proposed project is included in the 2004 Regional Transportation Improvement Program (RTIP), the proposed project would not cause an adverse regional impact. Even though the proposed project air quality impacts were modeled by the Southern California Association of Governments (SCAG) and conforms at the regional level, project air quality impacts should still be quantified for local operational impacts by the lead agency, compared with recognized operational daily significance thresholds and included in the Final CEQA document pursuant to CEQA Guidelines §15147 (see comment #1).
3. In Tables 3.3-4, 3.3-5 and 3.3-6 on pages 3-22 through 3-24, the lead agency has listed mitigation measures from the SCAQMD Rule 403 Implementation Handbook (January 1999). In the Final ND, the lead agency should list those mitigation measures the lead agency will actually implement from the tables or add a statement to Section 3.3.4 under Construction Mitigation that would state to the effect that the lead agency intends to implement all of the measures listed in Tables 3.3-4, 3.3-5 and 3.3-6.
4. On page 3-142 there is mention of eight properties within the area potentially affected by the proposed project. In the Final ND, it would be helpful if the lead agency identified the land uses of these properties and estimated the distances from the existing properties to each respective proposed project boundary. This would help identify any potential sensitive receptors that might be impacted by any potential project air quality impacts.
5. The CO hotspots analysis was prepared according to the screening procedure presented in the *Transportation Project-Level Carbon Monoxide Protocol (CO Protocol)* by the Institute of Transportation Studies UC Davis, revised December 1997. The CO Protocol screen methodology was developed using EMFAC7F emission factors.

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EPA approved EMFAC2002 as the only emission factor model for CO hotspots analyses in California on April 1, 2003 (Federal Register, Volume 68, Number 62, April 1, 2003). The grace period for using EMFAC7F ended June 30, 2003. Since the emission factors used for CO concentration estimation in the CO Protocol screening procedure are not approved by EPA and cannot be simply updated with EMFAC2002 emission factors, SCAQMD recommends that the lead agency remodel CO concentration according to the detailed analysis procedure presented in the CO Protocol with EMFAC2002 emission factors. EMFAC2002 can be downloaded from the Air Resources Board website at [http://www.arb.ca.gov/msei/on-road/latest\\_version.htm](http://www.arb.ca.gov/msei/on-road/latest_version.htm).

6. Traffic volumes were not provided to SCAQMD. Since traffic volumes were not provided, SCAQMD could not verify the traffic volumes used in the CO hotspots analysis. Traffic volumes should be provided in the Final MND.
7. In the event that quantification of the construction air quality impacts from the proposed project exceed established daily significance thresholds for PM10 (fugitive dust) emissions, the SCAQMD recommends the following mitigation measures to reduce construction-related PM10 fugitive dust emissions from the proposed project, if applicable and feasible:
  - a. Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive ten days or more).
  - b. Implement a shuttle service to and from retail services and food establishments during lunch hours.
  - c. Install wheel washers where vehicles enter and exit the construction site onto paved roads or wash off trucks and any equipment leaving the site each trip.
  - d. Use low sulfur diesel or alternative clean fuel such as compressed natural-gas powered construction equipment with oxidation catalyts.
  - e. Configure construction parking to minimize traffic interference.
  - f. Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow.
  - g. Schedule construction activities that affect traffic flow on the arterial system to off-peak hour to the extent practicable.
  - h. Reroute construction trucks away from congested streets or sensitive receptor areas.
  - i. Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site.

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- j. Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation.
8. In the event that quantification of the construction air quality impacts from the proposed project exceed established daily significance thresholds for Oxides of Nitrogen (NO<sub>x</sub>), the SCAQMD recommends the following mitigation measures to those mitigation measures proposed on page 3-24 to further reduce construction NO<sub>x</sub> impacts from the project, if applicable and feasible:
    - Prohibit truck idling in excess of five minutes.
    - Configure construction parking to minimize traffic interference.
    - Reroute construction trucks away from congested streets or sensitive receptor areas.
    - Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site.
    - Use electricity from power poles rather than temporary diesel generators.
    - Give preferential consideration to contractors who use clean fuel construction equipment; emulsified diesel fuels; construction equipment that uses low sulfur diesel and is equipped with oxidation catalysts, particulate traps, or other retrofit technologies, etc.