



# South Coast Air Quality Management District

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SENT VIA USPS:

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California Department of Transportation  
Department of Environmental Planning (405/Crenshaw)  
100 South Main Street MS-16A  
Los Angeles, CA 90012

## **Draft Initial Study (Draft IS) for the Proposed Interstate 405 Improvements**

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 Initial Study document. In the project description, the Lead Agency proposes to construct new deceleration and on ramp lanes as well as widen existing on-and-off ramps and surround arterial roadways.

In the Draft Initial Study, the project's air quality emissions during both construction and operation were not quantified. SCAQMD recommends that the Lead Agency prepare an air quality analysis and include it in the Final IS. The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. More recent guidance developed since this Handbook was published is also available on SCAQMD's website here: [www.aqmd.gov/ceqa/hdbk.html](http://www.aqmd.gov/ceqa/hdbk.html). Because this project will affect a roadway, SCAQMD staff also recommends that the Lead Agency use Sacramento Metropolitan Air Quality Management District "Roadway Construction Emissions Model"<sup>1</sup> to analyze air quality impacts.

The proposed project is located adjacent to sensitive land uses<sup>2</sup> (i.e., residential dwellings to the north, south, east, and west); however, the Draft MND does not contain an evaluation of the potential localized air quality impacts that could result from construction of the proposed project. Therefore, SCAQMD staff recommends revising the air quality analysis to include an assessment of potential localized air quality impacts during demolition and construction of the proposed project. These potential air quality impacts should be assessed using SCAQMD's Localized Significance Methodology and compared to the localized significance thresholds specific to the project area<sup>3</sup>. In the event that the Lead Agency determines the proposed project will result in significant localized construction air quality impacts, the SCAQMD staff recommends that the Lead Agency require mitigation to minimize these impacts to a less than significant level. Additional construction-related air quality mitigation measures are available at: [http://www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html)

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<sup>1</sup> Sacramento Metropolitan Air Quality Management District. "Roadway Construction Emissions Model" Accessed at: <http://www.airquality.org/ceqa/index.shtml>

<sup>2</sup> 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>

<sup>3</sup> The Localized Significance Threshold (LST) methodology and Mass Rate LST Look Up Table is available at: <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>

The SCAQMD staff is available to work with the Lead Agency to address these concerns and any other air quality questions that may arise. Please contact Jack Cheng, Air Quality Specialist at (909) 396-2448, if you have any questions regarding these comments. We look forward to reviewing and providing comments for the Final IS associated with this project.

Sincerely,

*Barbara Radlein*

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