



South Coast Air Quality Management District

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November 18, 2015

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Recirculated Draft Mitigated Negative Declaration (RDMND) for the Proposed State Route 60 (SR-60) Truck Lanes 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. In the project description, the Lead Agency proposes to construct an eastbound truck climbing lane and a westbound truck descending lane, along with inside and outside standard shoulders in both directions on SR-60 in Riverside County. The proposed project location is between Gilman Springs Road Post Mile 22.10 and Post Mile 26.61, west of the Jack Rabbit Trail intersection.

The SCAQMD staff incorporates by reference its comments made in a comment letter dated July 16, 2014 (attached) based on the SCAQMD staff review of the Draft MND circulated for public comment in June 16, 2014.

Although the RDMND states that that implementation of the proposed project would contribute criteria pollutants to the area during project construction and operation¹, the air quality analysis still does not quantify the proposed project's construction or operational air quality impacts for criteria pollutants, compare those estimates with regional or localized thresholds of significance, or include mitigation, if needed. Therefore, the RDMND has not substantiated its findings that these air quality impacts are less than significant. In addition, the narration below Table 2-36 (Traffic Data and Emissions Estimates) concludes that the modeled CO₂ emissions under the proposed Build Alternative would be marginally higher in Year 2018 but marginally lower at the horizon Year 2040 than emissions under the No Build Alternative². Based on the increase in emissions in Year 2018, the SCAQMD staff reiterates its position that the proposed project could also increase criteria emissions growth in addition to the increase in CO₂ emissions noted in the RDMND above. These emissions increases could result by goods-movement traffic coming from the ports, local warehouses that could travel along the project route and beyond to other destinations or heading out of state. The Final RMND should therefore include quantification of criteria emissions during operations in order to demonstrate the reductions anticipated by the Lead Agency based on the CO₂ modeling results shown in Table 2-36. Additionally, the Final RDMND should include an enforceable mitigation measure if trips, in addition to the traffic anticipated in the DRMND, exceed these estimates.

¹ RDMND, Section 2.4. Cumulative Impacts, Page 2-301

² Ibid., Section 2.5. Climate Change, Page 2-313.

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The SCAQMD staff requests that the Lead Agency provide SCAQMD staff with written responses to all comments contained herein prior to the adoption of the Final CEQA document. In addition, staff is available to work with the Lead Agency to address these concerns and any other air quality questions that may arise. Please contact Gordon Mize, Air Quality Specialist at (909) 396-3302, if you have any questions regarding these comments. We look forward to reviewing the Final RMND associated with this project.

Sincerely,

Jillian Wong

Jillian Wong, Ph.D.
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Planning, Rule Development & Area Sources

Attachment:

- SCAQMD Staff Cmt Ltr Dtd July 16, 2014

JW:GM

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