



South Coast  
Air Quality Management District  
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Caltrans District 12  
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**Draft Mitigated Negative Declaration (Draft MND) for the Proposed Westbound State Route 91 Lane Extension and Auxiliary Lane Reconstruction Project**

The South Coast Air Quality Management District (SCAQMD) 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 CEQA document.

Based on the project description, the lead agency proposes to extend a westbound lane on the northbound State Route (SR-55)/westbound State Route 91 (SR-91) connector through the Tustin Avenue Interchange and reconstruct the westbound auxiliary lane from east of the northbound SR-55/westbound SR-91 connector to the Tustin Avenue off-ramp, a total length of about 1.6 miles. Construction is scheduled to begin in the spring of 2013 and conclude in the fall of 2015. AQMD staff is concerned that the lead agency does not include in the Draft MND a quantified estimate of emissions from either construction or operations of this project, as required by CEQA. Without quantifying emissions, the lead agency has not demonstrated that impacts are less than significant under CEQA. At minimum, the lead agency should include a summary of any short- and long-term impacts described in Section 2.13 Air Quality, which references an Air Quality study on page 2-134. This information can be included in the Final MND in the narration, in a table(s) or as an appendix.

The AQMD staff recommends that the lead agency revise the CEQA document to include regional, localized and PM<sub>2.5</sub> construction air quality analyses. Guidance for existing air quality models that can assist in estimating regional air quality impacts can be found at the AQMD CEQA website<sup>1</sup>. Included is a link to the Roadway Construction Emissions Model from the Sacramento Metropolitan AQMD. Besides these resources, the lead agency can also follow the calculation methodologies in Chapter 9 and the Appendix to Chapter 9 in the South Coast AQMD's CEQA Air Quality Handbook<sup>2</sup>.

The AQMD staff also recommends that the lead agency evaluate localized air quality impacts since it is noted in Figure 1-2 (Sheet 3 of 3) and upon aerial map inspection that the proposed project is located within one-quarter mile of sensitive receptors (residential properties) north of the proposed project, north of East Riverdale Avenue and the SR-91. Therefore, the SCAQMD requests that the lead agency evaluate localized air quality impacts<sup>3</sup> to ensure that any nearby sensitive receptors are not adversely affected by the construction activities that are occurring in close proximity.

The AQMD also recommends that the lead agency estimate PM<sub>2.5</sub> impacts in response to adoption of PM<sub>2.5</sub> ambient air quality standards by U.S. EPA and CARB. AQMD staff has

developed a methodology for calculating PM<sub>2.5</sub> emissions when preparing air quality analyses for California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) documents. To determine if PM<sub>2.5</sub> air quality impacts are significant, SCAQMD staff has also developed recommended regional and localized significance thresholds. Guidance when preparing a PM<sub>2.5</sub> significance analysis can be found at the AQMD website<sup>4</sup>.

In the event that the lead agency's revised CEQA document demonstrates significant adverse air quality impacts the AQMD staff recommends that the lead agency require mitigation pursuant to Section 15370 of the CEQA Guidelines that could minimize or eliminate significant air quality impacts<sup>5</sup>.

Please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. The SCAQMD staff is available to work with the Lead Agency to address these issues and any other air quality 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,



Ian MacMillan  
Program Supervisor,  
CEQA Inter-Governmental Review  
Planning, Rule Development & Area Sources

Attachment

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<sup>1</sup> AQMD website: Air Quality Modeling, which can be accessed at <http://www.aqmd.gov/ceqa/models.html>

<sup>2</sup> The SCAQMD CEQA Air Quality Analysis Handbook is available from SCAQMD Subscription Services by calling (909) 396-3720. Supplementary guidance is also available on the SCAQMD website at: <http://www.aqmd.gov/ceqa/hdbk.html>

<sup>3</sup> Localized Significance Thresholds guidance can be found at: <http://www.aqmd.gov/ceqa/handbook/LST/LST.html> .

<sup>4</sup> PM<sub>2.5</sub> significance analysis guidance can be found at [http://www.aqmd.gov/ceqa/handbook/PM2\\_5/PM2\\_5.html](http://www.aqmd.gov/ceqa/handbook/PM2_5/PM2_5.html)

<sup>5</sup> Mitigation measure suggestions can be found at [http://www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html)