



South Coast Air Quality Management District

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E-MAILED: SEPTEMBER 30, 2011

September 30, 2011

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**Draft Initial Study/Environmental Assessment/Mitigated Negative Declaration
(Draft IS/EA/MND) for the Proposed John S. Gibson Boulevard/I-110 Access
Ramps and SR 47/I-110 Connector Improvements**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. AQMD staff appreciates that the Port of Los Angeles included an analysis of both regional and localized air quality impacts during construction of this roadway project, consistent with the requirements of CEQA and AQMD guidance. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final CEQA document.

Upon review of the air quality analysis on page five in Appendix B (Impact Analyses Required for Port of Los Angeles), the lead agency describes sensitive receptors near the project site: family residences at various points along project work areas and the Barton Hill Elementary School to the south. In its discussion, the lead agency estimated that the closest sensitive receptor is approximately 800 feet (243.84 meters) from the project site. Although the 800 foot distance applies to the Barton Elementary School location, some of the residences along the potential SR47/I-110 Connector are as close as 81 feet (25 meters) from the connector work locations. Therefore, the localized significance thresholds (LSTs) shown in Table B-3 Estimate of Peak Daily Localized Construction Emissions (pounds/day) should be revised using the more appropriate 25 meter distance to determine LSTs from the AQMD lookup tables.¹ Based on these changes to the threshold levels, the lead agency's estimates for localized construction impacts might exceed the localized significance threshold levels for NOx and PM10. If so, additional mitigation measures may be warranted, pursuant to CEQA Guidelines §15070.²

¹ <http://www.aqmd.gov/ceqa/handbook/LST/LST.html> .

² Mitigation measure suggestions can be found at
http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html

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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, Inter-Governmental Review
Planning, Rule Development & Area Sources

Attachment

IM:GM

LAC110728-02
Control Number