



South Coast Air Quality Management District

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Mitigated Negative Declaration (DMND) for the Proposed State Route 22 Eastbound Improvement 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.

In the project description, the Lead Agency proposes to a safety project along a portion of State Route 22 (SR-22) from approximately Beach Boulevard to the connector with Interstate 5/State Route 57. The proposed project will include: 1) removing a portion of the existing concrete barrier and relocate the point of divergence further eastward to North Bristol Street interchange, 2) reconfiguring the eastbound SR-22 mainline freeway, and 3) widening SR-22 eastbound connector to northbound I-5/northbound SR-57 to add one lane. Other construction would include work on traffic control devices and construction of an electronic message sign. Soil disturbance will involve an approximately 10.74-acre area requiring an undisclosed amount of soil import. Construction is estimated to last approximately five years, but the start and completion dates are not disclosed.

Air Quality Analysis

SCAQMD staff recommends that the Lead Agency provide information in the Final MND to support the conclusion that the construction-related air quality impacts are less than significant. In the air quality analysis of the MND, the Lead Agency concluded that a construction emission report is not needed because the construction activities will be less than five years. To adequately disclose the construction emission impacts, SCAQMD staff recommends the Lead Agency include a project-specific analysis of the regional and localized impacts. The regional construction emission impacts¹ can be compared with the SCAQMD recommended daily significance thresholds. Based on a review of the aerial photographs included in the DMND, sensitive receptors are located within a quarter mile of the proposed project at various points along the proposed project's realignment route. Therefore, localized construction-related air

¹Regional construction emission impacts can be estimated using the Sacramento Roadway Emissions Model <http://www.aqmd.gov/home/regulations/ceqa/air-quality-modeling> or applicable emission calculation methodologies from the SCAQMD California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 available on SCAQMD's website here: [http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993))

quality impacts should be quantified and evaluated to ensure that any nearby sensitive receptors are not adversely affected by the construction activities that are occurring in close proximity. The SCAQMD guidance for performing a localized air quality analysis can be found on the SCAQMD web page at: <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>.

Potential Mitigation Measures

CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate these impacts. Pursuant to the CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. In the event that the Lead Agency finds after analyses that construction-related air quality impacts would exceed the SCAQMD daily significance thresholds and that the proposed project would have a significant adverse air quality impact, information on mitigation measures as guidance to the Lead Agency are available on the SCAQMD CEQA Air Quality Handbook website at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>. Additional construction mitigation measures for the Lead Agency to consider are included in the attachment.

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. SCAQMD staff is available to work with the Lead Agency to address any air quality questions that may arise. If you have any questions regarding the comments, please contact Gordon Mize, Air Quality Specialist, CEQA IGR at gmize@aqmd.gov or (909) 396-3302.

Sincerely,

Lijin Sun

Lijin Sun, J.D.
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources

Attachment
JW:LS:GM

ORC170117-09
Control Number

ATTACHMENT

Additional construction mitigation measures for the Lead Agency to consider may include the followings:

- Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export) and if the Lead Agency determines that 2010 model year or newer diesel trucks cannot be obtained the Lead Agency shall use trucks that meet EPA 2007 model year NOx emissions requirements.
- Consistent with measures that other Lead Agencies in the South Coast Air Basin (including Port of Los Angeles, Port of Long Beach, Metro and City of Los Angeles) have enacted, require all on-site construction equipment to meet the following:
 - All off road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
 - A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.
 - Encourage construction contractors to apply for SCAQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for SCAQMD "SOON" funds. The "SOON" program provides funds to accelerate clean-up of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at the following website: <http://www.aqmd.gov/home/programs/business/business-detail?title=off-road-diesel-engines>.
- Require the use of electricity from power poles rather than temporary diesel or gasoline power generators.
- Provide temporary traffic controls such as a flag person, during all phases of significant construction activity to maintain smooth traffic flow.
- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site.
- Reroute construction trucks away from congested streets or sensitive receptor areas.
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation.
- Improve traffic flow by signal synchronization.
- Limit soil disturbance to the amounts analyzed in the Final EIR.
- All materials transported off-site shall securely covered.
- Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more).
- Water active sites at least twice daily;
- Apply water three times daily, or non-toxic soil stabilizers according to manufacturers' specifications, to all unpaved parking or staging areas or unpaved road surfaces;
- Traffic speeds on all unpaved roads to be reduced to 15 mph or less.

- Construct or build with materials that do not require painting.
- Require the use of pre-painted construction materials.

For additional measures to reduce off-road construction equipment, please refer to the mitigation measure tables located at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>.