



# South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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## **Mitigated Negative Declaration (MND) for the Proposed Base Line Bridge Replacement 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.

### SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to construct a new bridge of 95.5 feet in width and 600 feet in length to replace the existing 72-foot-wide and 42-foot-long Base Line Bridge (State Bridge Number 54C0035) (Proposed Project). The bridge replacement construction is expected to take 188 working days<sup>1</sup>.

### SCAQMD Staff's Comments on Air Quality Analysis

SCAQMD staff recommends that the Lead Agency provide substantial evidence in the Final MND to support a fair argument that the Proposed Project's construction-related air quality impacts are less than significant. In the air quality analysis of the MND, the Lead Agency stated that since the Proposed Project will add no lanes, it will not add capacity to the roadway. "It would have equivalent long-term air pollutant emissions as the existing use, impacts related to this issue are considered less than significant and no mitigation is required<sup>2</sup>." Therefore, the Lead Agency did not quantify emissions from the Proposed Project's construction activities or operation of construction equipment during the 188-day bridge replacement phase.

One of the basic purposes of CEQA is to inform government decision makers and the public about the potential, significant environmental effects of proposed activities (CEQA Guidelines Section 15002(a)(1)). A mitigated negative declaration is appropriate when the Lead Agency finds that the project will not have a significant effect on the environment after incorporating mitigation measures (CEQA Guidelines Sections 15070 to 15075). Reasons to support this finding shall be documented in the initial study. Without quantifying emissions from construction activities, the MND has not made that documentation which serves as substantial evidence to support a fair argument that the 188-day bridge replacement construction phase of the Proposed Project would not have any adverse effects on air quality. Therefore, SCAQMD staff recommends that the Lead Agency perform and disclose Proposed Project-specific analysis of the regional and localized air quality impacts in the Final MND. The regional construction emission impacts<sup>3</sup> should be compared to SCAQMD's regional air quality CEQA significance thresholds to determine the significance of air quality impacts. Based on a review of the

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<sup>1</sup> MND, Page 6.

<sup>2</sup> MND, Pages 18 and 19.

<sup>3</sup>Regional 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)).

aerial photographs, SCAQMD staff found that sensitive receptors (residences) are located in proximity to the Proposed Project between Boulder Avenue and Yernell Road. Therefore, potential localized construction-related air quality impacts from the Proposed Project 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>.

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, response should provide sufficient details giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful or useful to decision makers and the public who are interested in the Proposed Project.

Sincerely,

*Lijin Sun*

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Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

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