



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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Draft Environmental Impact Report/Environmental Assessment (Draft EIR/EA) for the Proposed State Route 60/World Logistics Center Parkway Interchange Project (SCH No.: 2019220505)

South Coast Air Quality Management District (South Coast AQMD) 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 EIR/EA.

South Coast AQMD Staff's Summary of Project Description

The Lead Agency proposes to construct two lanes along a two-mile segment of State Route 60 (SR-60) and improve the SR-60 and World Logistics Center (WLC) Parkway interchange between Post Mile (PM) 20 and PM 22.0 in order to improve existing interchange geometric deficiencies, provide increased interchange capacity, alleviate existing and future traffic congestion at the interchange ramps during peak hours, and improve traffic flow¹ (Proposed Project). Specifically, the Proposed Project includes reconstruction of westbound and eastbound SR-60 on- and off-ramps, addition of auxiliary lanes in each direction from the SR-60 and WLC Parkway interchange to the Redlands Boulevard (west) and Gilman Springs Road (east) interchange on- and off-ramps, and improvements to Theodore Street/WLC Parkway north to Ironwood Avenue and south to Eucalyptus Avenue and Dracaea Avenue². Construction of the Proposed Project is expected begin in early 2022 and last approximately 19 months³. Based on a review of Figure 1-1: *Project Location and Vicinity*, in the Draft EIR/EA⁴ and aerial photographs, South Coast AQMD staff found that sensitive receptors such as residential uses are located adjacent to the Proposed Project.

Summary of South Coast AQMD Staff's Comments on the Air Quality Analysis

In the Air Quality Analysis Section of the Draft EIR/EA, the Lead Agency quantified the Proposed Project's construction emissions and committed to six air quality minimization measures, including compliance with South Coast AQMD Rule 403, maintaining equipment per manufacturer specifications, adherence to air pollution control rules, and limiting construction vehicles idling to five minutes⁵. The Lead Agency found that the Proposed Project's air quality impacts from construction activities would be less than significant. The Lead Agency also conducted regional air quality conformity analysis and the project-level, hot-spot analyses for CO, PM_{2.5}, and PM₁₀. The Lead Agency concluded that the Proposed Project is in conformity with the State Implementation Plan; is not required to conduct a detailed quantitative CO hot-spot analysis; and is not a project of air quality concern for particulate matter⁶. However, the Lead Agency did not compare the Proposed Project's regional construction

¹ Draft EIR. Chapter 1: Proposed Project. Page 1-1.

² Draft EIR. Summary. Page S-2 to S-3.

³ Draft EIR. Chapter 1: Proposed Project. Page 1-19.

⁴ *Ibid.* Page 1-3.

⁵ Draft EIR. Chapter 2.14: Air Quality. Page 2.14-15.

⁶ Draft EIR. Chapter 2. Pages 2.14-15 to 23.

emissions to South Coast AQMD's regional air quality CEQA significance thresholds for construction to determine the level of significance, analyze the Proposed Project's localized construction air quality impacts or long-term air quality impacts from induced growth, or conduct a mobile source Health Risk Assessment (HRA). Therefore, there is not enough substantial evidence in the Draft EIR/EA to support the Lead Agency's findings that the Proposed Project's air quality impacts would be less than significant and would not expose sensitive receptors to substantial pollutant concentrations. Detailed comments are included in the attachment.

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), South Coast AQMD staff requests that the Lead Agency provide South Coast AQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR/EA. In addition, issues raised in the comments should be addressed in detail 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 will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and to the public who are interested in the Proposed Project.

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Margaret Isied, Assistant Air Quality Specialist, at misied@aqmd.gov or (909) 396-2543, should you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment

LS:MI

RVC200501-04

Control Number

ATTACHMENT

1. Air Quality CEQA Thresholds of Significance

CEQA thresholds of significance assist a Lead Agency in determining whether a project may cause significant environmental impacts. While CEQA permits a Lead Agency to apply appropriate thresholds to determine the level of significance, the Lead Agency may not apply thresholds in a manner that precludes consideration of substantial evidence demonstrating that there may be a significant effect on the environment. Evaluation of air quality impacts, unlike some other impact areas, easily lends itself to quantification. Not only does quantification make it easier for the public and decision-makers to understand the breadth and depth of the potential air quality impacts, but it also facilitates the identification of mitigation measures required to reduce any significant adverse air quality impacts. Lead agencies can develop and publish their own significance thresholds or use significance thresholds recommended by other public agencies or experts (CEQA Guidelines Sections 15064 and 15064.7(c)). South Coast AQMD's CEQA thresholds of significance for air quality provide a clear quantitative benchmark to determine the significance of a project's air quality impacts. Therefore, for most projects within the South Coast Air Basin, South Coast AQMD's air quality CEQA thresholds of significance for construction and operation⁷ are used to determine the level of significance for a project's air quality impacts.

The Lead Agency quantified the maximum construction emissions for the Proposed Project's in pounds per day⁸ but did not compare those emissions to South Coast AQMD's regional air quality CEQA significance thresholds to determine the level of significance for the Proposed Project's construction air quality impacts⁹. Additionally, the Lead Agency did not develop environmental standards that it used to evaluate and determine the significance level of the Proposed Project's air quality impacts in the Draft EIR/EA. Using South Coast AQMD's CEQA significance thresholds would clearly identify whether the Proposed Project would result in significant air quality impacts under CEQA, disclose the magnitude of the impacts, facilitate the identification of feasible mitigation measures and alternatives, and evaluate the level of impacts before and after mitigation measures. Therefore, South Coast AQMD staff recommends that the Lead Agency compare the emissions to South Coast AQMD's regional air quality CEQA significance thresholds in the Final EIR/EA to determine the level of significance for the Proposed Project's air quality impacts.

2. Localized Construction Air Quality Impact Analysis

Based on a review of Figure 1-1: *Project Location and Vicinity*, in the Draft EIR/EA¹⁰, and aerial photographs, South Coast AQMD staff found that existing residential uses are located in close proximity to the eastern side of the Proposed Project. However, the Lead Agency did not analyze the Proposed Project's localized air quality impacts in the Draft EIR/EA. Localized air quality impacts from construction activities can cause direct physical changes to the environment by resulting in incremental increases in emissions in and around the Proposed Project's construction zones, which should be considered in evaluating the significance of the environmental effects of a project (CEQA Guidelines Section 15064). Therefore, South Coast AQMD staff recommends that the Lead Agency quantify the Proposed Project's localized emissions from construction activities and disclose them in the Final EIR/EA to serve as substantial evidence that any nearby sensitive receptors are not adversely affected by emissions from construction activities that are occurring in close proximity.

⁷ South Coast AQMD. March 2015. *South Coast AQMD Air Quality Significance Thresholds*. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>.

⁸ Draft EIR. Air Quality Report. Table 4-1: Maximum Project Construction Emissions.

⁹ *Ibid.*

¹⁰ *Ibid.* Page 1-3.

South Coast AQMD's guidance for performing a localized air quality impact analysis is available on South Coast AQMD website¹¹.

3. Operational Air Quality Impacts

In the Air Quality Report of the Draft EIR/EA, the Lead Agency concluded operational impacts would not result in long term regional air quality impacts¹². However, in the Traffic Study Report of the Draft EIR/EA, Exhibit 13: *Existing and Future Mainline Volumes on SR-60*, the Lead Agency anticipated truck traffic demand at the Proposed Project would increase between 123% and 151% from year 2025 to year 2045 in both the eastbound and westbound directions¹³. In general, a transportation project that adds lanes can increase freeway capacity and generate or attract new or additional vehicular trips, which leads to increases in criteria pollutants and air toxics emissions. It can also lead to more dispersed land use development, which in turn leads to additional vehicle miles traveled and increases in criteria pollutants and air toxics emissions. Since the Proposed Project includes construction of two highway lanes to increase interchange capacity and traffic volume, particularly truck traffic¹⁴, it is reasonably foreseeable that the Proposed Project may cause an indirect physical change in the environment later in time or farther removed in distance (CEQA Guidelines Section 15358). South Coast AQMD staff recommends that the Lead Agency use a good faith effort to quantify and disclose any potential adverse air quality impacts from additional vehicles and trucks traveling on the Proposed Project as substantial evidence to support a finding that the Proposed Project's air quality impacts from an indirect physical change in the environment would be less than significant in the Final EIR/EA (CEQA Guidelines Section 15064).

4. Mobile Source HRA

As stated above, sensitive receptors are located in close proximity to the Proposed Project. Sensitive receptors are people that have an increased sensitivity to air pollution or environmental contaminants. Sensitive receptors include schools, daycare centers, nursing homes, elderly care facilities, hospitals, and residential dwelling units. The Draft EIR/EA states that "the WLC Parkway/SR-60 interchange is an access point for a number of future logistics facilities. The interchange is expected to experience an increase in truck volumes due to increased shipping traffic through the area"¹⁵. It is reasonably foreseeable that the Proposed Project would result in incremental increases in emissions concentrations at the Proposed Project. Sensitive receptors living near the Proposed Project could be exposed to increased diesel particulate matter (DPM) emissions from additional diesel fueled, heavy-duty trucks traveling on the Proposed Project. The California Air Resources Board (CARB) has identified DPM as a toxic air contaminant based on its carcinogenic effects. Therefore, South Coast AQMD staff recommends that the Lead Agency conduct a mobile source HRA¹⁶ in the Final EIR/EA to disclose the potential health risks to residents from vehicles including DPM-emitting diesel-fueled vehicles that will use the Proposed Project; otherwise, there is not enough substantial evidence to support the Lead Agency's finding that the Proposed Project would not expose sensitive receptors to substantial pollutant concentrations.

¹¹ South Coast AQMD. *Localized Significance Thresholds*. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

¹² Draft EIR. Chapter 2.14: Air Quality. Page 42.

¹³ Draft EIR. Traffic Study Report. Appendix B. Page 2

¹⁴ Draft EIR. Chapter 1: Proposed Project. Page 1-15.

¹⁵ Draft EIR. Chapter 2.23: Cumulative Impacts. Page 2.23-3.

¹⁶ South Coast AQMD. "Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis." Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.