



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

E-MAILED: APRIL 14, 2010

April 14, 2010

Ron Kosinski, Deputy Director
California Department of Transportation, District 7
100 South Main Street
Los Angeles, CA 90012

**Draft Environmental Impact Report / Environmental Assessment
for the Interstate 10 (San Bernardino Freeway / El Monte Busway)
High-Occupancy Toll Lanes Project**

South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document, including with an extended review period. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final EIR/EA.

SCAQMD staff is concerned that the air quality impacts of this project are not adequately disclosed in the materials made available for review. The SCAQMD has developed guidelines to assist public agencies with the preparation of air quality CEQA analyses.¹ In particular, localized significance thresholds (LST's) have been developed to determine potentially significant impacts from construction activities. The project proposes to construct new toll lane infrastructure and to widen the I-10 freeway by adding an additional lane for HOT use. Quantification of air quality impacts from this construction were not presented in the Draft EIR/EA, yet the lead agency determined that air quality impacts would be less than significant. SCAQMD staff encourages the lead agency to quantify any potential air quality impacts prior to making a significance determination in the Final EIR/EA. If impacts are found to be significant, all feasible mitigation measures should be considered.

In addition, the lead agency states that the purpose of the proposed project is to lessen congestion along the I-10 corridor. Information made available to SCAQMD staff (including paper copies of the Draft EIR/EA, materials on cd, and online reports) does not appear to present the rationale indicating how the proposed project will achieve this goal. The Final EIR/EA should provide additional justification about how the proposed conversion of carpool lanes to toll lanes will accomplish the stated objective. For example, a description of how many vehicles are expected to shift into the carpool lane and how many single occupancy vehicles (i.e., hybrids and natural gas vehicles) will shift from the carpool lane into general use lanes should be provided.

¹ www.aqmd.gov/ceqa/hdbk.html

Mr. Ron Kosinski
Deputy Director, District 7

April 14, 2010

Further, in the spreadsheets provided electronically by the lead agency, it is assumed that in the horizon year of 2035 that traffic volumes will generally increase less than 5% while the project will increase lane capacity from 5 total lanes to 6 total lanes each way (a 20% increase). It is unclear from the documentation provided for the project how the traffic volumes are expected to remain similar to the baseline year (within ~5%) with an increased freeway capacity of 20% that will serve a community with growing populations. If traffic impacts in the Draft EIR/EA are reported incorrectly, then air quality impacts may be underestimated. A more thorough explanation of the traffic assumptions for the project should be provided in the Final EIR/EA.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD staff with written responses to all comments contained herein prior to the adoption of the Final EIR/EA. The SCAQMD staff would be happy to work with the Lead Agency to address these issues and any other questions that may arise. If you have any questions regarding these comments, please contact Ian MacMillan at (909) 396-3244.

Sincerely,



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

Attachment

IM
LAC100217-01
Control Number