



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

May 19, 2017

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Draft Environmental Impact Report/Environmental Assessment (Draft EIR/EA) for the Proposed SR-110 Safety Enhancement Project (SCH No.: 2016071077)

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 EIR/EA.

Project Description

The Lead Agency proposes upgrades to State Route (SR) 110 between post miles 24.0 and 30.4 to improve the operational and safety characteristics on SR-110. The project would also include removing concrete sidewalks, construction of concrete barriers, installation of impact barriers, and other safety features.

Air Quality Analysis

Based on a review of the air quality analysis in the Draft EIR, the SCAQMD staff found that the Lead Agency did not quantify or include the project's air emissions during construction. One of the basic purposes of CEQA is to inform governmental decision makers and the public about the potential, significant environmental effects of proposed activities (CEQA Guidelines Section 15002(a)(1)). The goal of an EIR is to inform governmental decision makers and the public generally of the environmental impacts of a proposed project (CEQA Guidelines Section 15003(c)). Without showing the calculations of the project's air emissions from construction activities, the air quality analysis is not sufficient as substantial evidence to support the Lead Agency's finding that is required by the CEQA Guidelines Section 15091. Therefore, the SCAQMD staff recommends that the Lead Agency calculate construction emissions and include them in the Final EIR/EA.

The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD staff recommends that the Lead Agency use this Handbook as guidance to prepare the air quality analysis in the Final EIR/EA. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. More recent guidance developed since this Handbook was published is also available on SCAQMD's website here: www.aqmd.gov/ceqa/hdbk.html. SCAQMD staff also recommends that the Lead Agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and is available free of charge at: www.caleemod.com.

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Pursuant to Public Resources Code Section 21092.5, SCAQMD staff requests that the Lead Agency provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final EIR/EA. Further, staff is available to work with the Lead Agency to address the issues raised in the letter and any other questions that may arise. Please contact Jack Cheng, Air Quality Specialist, CEQA IGR Section, at (909) 396-2448, if you have any questions regarding the enclosed comments.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS:JC

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