



# South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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## **Negative Declaration (ND) for the Proposed Interstate 10/Portola Avenue New Interchange 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 ND.

### SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to construct a new interchange on Interstate 10 (I-10) at Portola Avenue in the City of Palm Desert between the Monterey Avenue and Cook Street interchanges (Proposed Project). The Proposed Project would also include construction of a new bridge structure over I-10 and the Union Pacific Railroad. The Proposed Project is intended to accommodate existing and forecasted traffic and relieve congestion. Construction is expected to occur over 36 months<sup>1</sup>.

### Air Quality Analysis

SCAQMD staff recommends that the Lead Agency provide information in the Final ND to support the conclusion that the construction-related air quality impacts are less than significant. In the air quality analysis of the ND, the Lead Agency conducted air quality conformity analysis<sup>2</sup> but did not quantify emissions from construction activities. 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 negative declaration is appropriate when the Lead Agency finds that the project will not have a significant effect on the environment (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 ND has not made that documentation which serves as substantial evidence to support a fair argument that 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 ND. The regional construction emission impacts<sup>3</sup> can 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 aerial photographs, SCAQMD staff found that sensitive receptors (residences) are located approximately a quarter mile south of the Proposed Project. 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

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<sup>1</sup> ND. Page 253.

<sup>2</sup> *Ibid.* Pages 154 to 172.

<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))

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 ND for adoption together with any comments received during the public review process. SCAQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact me at [lsun@aqmd.gov](mailto:lsun@aqmd.gov) if you have any questions.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

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