



# South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

May 1, 2018

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Environmental Analysis

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## **Mitigated Negative Declaration (MND) for the Interstate 605/Katella Avenue 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 MND.

### SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to improve the Interstate 605 (I-605) and Katella Avenue interchange from Post Mile 1.1 to Post Mile 1.6 in Orange County (Proposed Project). The Proposed Project is intended to improve both interchange traffic operations and pedestrian and bicycle facilities. Two build alternatives are proposed. Build alternative one will be constructed over a 12-month period, and build alternative two will take approximately 18 months to construct. According to the MND, "the closest sensitive receptors to the proposed project include residential uses that are along the southeastern border of the project site, parallel to I-605<sup>1</sup>."

### SCAQMD Staff's Comments – Localized Air Quality Impact Analysis during Construction

Air quality impacts from both construction (including demolition, if any) and operation activities should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips).

Sensitive receptors are people that have an increased sensitivity to air pollution or environmental contaminants. They include schools, parks and playgrounds, daycare centers, nursing homes, elderly care facilities, hospitals, and residential dwelling units. As stated above, existing residential uses are located along the southeastern border of the Proposed Project. To ensure that any nearby residences are not adversely affected by the construction activities that are occurring in close proximity, SCAQMD staff recommends that the Lead Agency quantify the Proposed Project's localized construction emissions for each build alternative and disclose the localized air quality impacts in the Final MND. SCAQMD guidance for performing a localized air quality analysis is available on SCAQMD website<sup>2</sup>.

### Closing

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

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<sup>1</sup> MND, Page 2.2.6-6.

<sup>2</sup> South Coast Air Quality Management District. *Localized Significance Thresholds*. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

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 to the public who are interested in the Proposed Project.

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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ORC180410-11

Control Number