



# South Coast Air Quality Management District

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SENT VIA E-MAIL:

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**Draft Environmental Impact Report (EIR)/Environmental Assessment (EA) for the  
Proposed SR 47 Vincent Thomas Bridge Deck Replacement Project (Proposed Project)  
(SCH No.: 2023040301)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The California Department of Transportation (Caltrans) is the Lead Agency under the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA) for the Proposed Project. To provide context, South Coast AQMD staff has provided a brief summary of the project information and prepared the following comments organized by topic of concern.

South Coast AQMD Staff's Summary of Project Information in the Draft EIR/EA

Based on the Draft EIR/EA, the Proposed Project consists of replacing the bridge deck, median concrete barrier, and guardrails, and upgrading seismic sensors to enhance the bridge's safety.<sup>1</sup> The Proposed Project is located at the southern end of State Route (SR) 47 in Los Angeles County at the Port of Los Angeles (POLA).<sup>2</sup> The Proposed Project evaluates the No Build Alternative (Alternative 1) and the Build Alternative (Alternative 2) scenarios.<sup>3</sup> Under Alternative 2, four construction staging options would be evaluated, with a construction period spanning between 16 to 48 months.<sup>4</sup> Construction is scheduled to begin in Fall 2025.<sup>5</sup>

South Coast AQMD Staff's Comments on the Draft EIR/EA

*Assembly Bill 617 (AB 617)-designated Wilmington, Carson, /West Long Beach (WCWLB)  
Community*

The Proposed Project area includes the AB 617-designated WCWLB community and is heavily impacted by air pollution generated from sources such as ports, refineries, the oil and gas industry, heavy-duty diesel trucks, warehouses, and railroad activities. As part of the AB 617 process, South Coast AQMD is required to work with a Community Steering Committee (CSC) to develop a Community Emission Reduction Plan (CERP) that identifies air quality priorities and related

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<sup>1</sup> Draft EIR/EA. Page 1-7.

<sup>2</sup> *Ibid.* Page S-3.

<sup>3</sup> *Ibid.*

<sup>4</sup> *Ibid.*

<sup>5</sup> *Ibid.* Page 1-12.

actions to reduce air pollution in the community. The South Coast AQMD Governing Board adopted the WCWLB CERP on September 6, 2019. South Coast AQMD staff recommends that the Lead Agency review the actions to reduce air pollution in the community included in Chapter 5 of the WCWLB CERP, which can be found at <https://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/wilmington/cerp/final-cerp-wcwlb.pdf> (page 125).

South Coast AQMD staff also recommends that the Lead Agency continue working with South Coast AQMD to explore whether additional measures to mitigate or further reduce emissions can be implemented at the Proposed Project to support actions in the WCWLB CERP. In addition, the Lead Agency is recommended to review the related WCWLB CERP Objectives listed below:

- 1) Chapter 5d, Objective 2: Reduce Emissions from Heavy-Duty Trucks
- 2) Chapter 5g, Objective 3: Reduce Exposure to Harmful Air Pollutants in Homes

*Completion of CEQA/NEPA Air Quality Impacts Analysis During Construction and Operation Activities*

The air quality analysis section in the Draft EIR/EA mentions that “...*Although the project will have a temporary impact on traffic volumes during construction, the detour traffic is anticipated to generate an incremental increase in concentrations of particulate matter less than 10 microns in size (PM10) that are less than the applicable threshold. Deck replacement activities would last 16 to 48 months depending on the scenarios, but are anticipated to generate less temporary emissions than an applicable regional mass emissions threshold, except for Scenario 8 (Overnight Closure with Pre-Cast Bridge Deck) ...*”<sup>6</sup> However, no emissions calculations have been provided in the Draft EIR/EA to support the discussion stated above. Hence, South Coast AQMD staff is concerned about the conclusion of being “less than the applicable thresholds” and “less emission than an applicable regional mass emission threshold” without any supporting evidence.

Staff recommends that the Lead Agency use South Coast AQMD’s CEQA Air Quality Handbook and website<sup>7</sup> as guidance when preparing the air quality and greenhouse gas analyses. It is also recommended that the Lead Agency use the California Emission Estimator Model (CalEEMod)<sup>8</sup> land use emissions software, which can estimate pollutant emissions from typical land use development and is the only software model maintained by the California Air Pollution Control Officers Association. In addition, South Coast AQMD has developed both regional and localized significance thresholds (LSTs); hence, staff recommends that the Lead Agency quantify criteria pollutant emissions and compare the emissions to South Coast AQMD’s CEQA regional air quality significance thresholds<sup>9</sup> and LSTs<sup>10</sup> to determine the Proposed Project’s air quality impacts. The localized analysis can be conducted by either using the LST screening tables or performing dispersion modeling. The Lead Agency should identify any potential adverse air quality impacts

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<sup>6</sup> *Ibid.* Page 3-6.

<sup>7</sup> South Coast AQMD’s CEQA Handbook and other resources for preparing air quality analyses can be found at <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>

<sup>8</sup> CalEEMod is available free of charge at [www.caleemod.com](http://www.caleemod.com)

<sup>9</sup> South Coast AQMD’s CEQA regional pollutant emissions significance thresholds can be found at <https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf>

<sup>10</sup> South Coast AQMD’s guidance for performing a localized air quality analysis can be found at <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations 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, and hauling trips). Operation-related air quality impacts may include, but are not limited to, emissions from area sources (e.g., solvents and coatings) and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, emissions from the overlapping construction and operational activities should be combined and compared to South Coast AQMD's regional air quality CEQA operational thresholds to determine the level of significance. If the Proposed Project generates diesel emissions from long-term construction or attracts diesel-fueled vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment.<sup>11</sup>

Therefore, South Coast AQMD staff recommends that the Lead Agency revise the air quality analysis section to include:

- 1) Estimated the maximum daily on-site construction emissions using CalEEMod land use emissions software and compare these emissions against the South Coast AQMD LSTs.
- 2) Quantify criteria pollutant emissions during construction and operation, as well as GHG emissions, using CalEEMod land use emissions software and compare the emissions to South Coast AQMD's CEQA regional air quality significance thresholds.

It is important to note that the localized analysis can be conducted either by using the LST screening tables or by performing dispersion modeling. This analysis will provide a preliminary assessment of the potential air quality impacts, both at the regional and localized levels, arising from the Proposed Project.

### Conclusion

As set forth in California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), the Lead Agency shall evaluate comments from public agencies on the environmental issues and prepare a written response at least 10 days prior to certifying the Final EIR/EA. As such, please provide South Coast AQMD written responses to all comments contained herein at least 10 days prior to the certification of the Final EIR/EA. In addition, as provided by CEQA Guidelines Section 15088(c), if the Lead Agency's position is at variance with recommendations provided in this comment letter, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided.

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<sup>11</sup> South Coast AQMD's guidance for performing a mobile source health risk assessment can be found at <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>

Jason Roach

July 11, 2024

Thank you for the opportunity to provide comments. 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 Danica Nguyen, Air Quality Specialist, at [dnguyen1@aqmd.gov](mailto:dnguyen1@aqmd.gov) should you have any questions.

Sincerely,

*Sam Wang*

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Planning, Rule Development & Implementation

SW:DN

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