



South Coast Air Quality Management District

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E-mailed: July 16, 2014
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Environmental Planning
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Review of the Draft Mitigated Negative Declaration (MND) for State Route 60 Truck Lanes Project

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comment is intended to provide guidance to the Lead Agency and should be incorporated into the final California Environmental Quality Act (CEQA) document as appropriate.

The above mentioned Draft Mitigated Negative Declaration (Draft MND) does not adequately demonstrate that the project will have less than significant air quality impacts. Specifically, the Lead Agency did not quantify the project's air quality impacts. Absent a quantitative air quality analysis the Draft MND does not substantiate the Lead Agency's significance determination. Therefore, the SCAQMD staff recommends that the Lead Agency revise the Draft MND to include a quantitative air quality analysis that evaluates all potential construction and operational related emissions from the project. Further, SCAQMD staff is concerned that while the proposed project may not directly generate traffic, it could accommodate and potentially encourage growth. This type of indirect impact is "cumulatively considerable" under CEQA and must be analyzed by comparing existing conditions with future project conditions. Therefore, the SCAQMD staff recommends that the Lead Agency revise the Draft MND to assess this potential impact. If the revised air quality analysis demonstrates that the project will result in significant air quality impacts SCAQMD staff recommends that the Lead Agency include air quality mitigation measures pursuant to Section 15126.4 of the CEQA guidelines. Details regarding these comments are attached to this letter.

The SCAQMD staff requests that the Lead Agency provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the final environmental document. Also, staff is available to work with the Lead Agency to

address these issues and any other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Ed Eckerle". The signature is fluid and cursive, with the first name "Ed" being more prominent.

Ed Eckerle
Program Supervisor
Planning, Rule Development & Area Sources

EE:DG

RVC140715-06

Control Number

Air Quality Air Quality (Operational and Construction Emissions Analysis)

1. The Lead Agency did not conduct an air quality analysis to determine the construction or operational impacts from the proposed project. The Lead Agency appears to conclude that an air quality analysis is not required for the proposed project given that the Southern California Association of Government's (SCAG) Transportation Conformity Working Group (TCWG) determined that the project is exempt from conformity demonstration pursuant to 40 C.F.R § 93.126. However, 40 C.F.R § 93.126 is specific to project level transportation conformity and does not relieve a project from complying with the requirements of CEQA (California Public Resources Code 2100 et al.). Absent a quantitative air quality analysis, the Draft MND does not substantiate the Lead Agency's determination that the project will result in less than significant air quality impacts. Therefore, the SCAQMD staff recommends that the Lead Agency revise the Draft MND to include a quantitative air quality analysis that substantiates the Lead Agency's significance determination. Specifically, the revised Draft MND should quantify all potential regional and localized air quality impacts during the construction and operational phases of the project. Guidance for performing localized and regional air quality analyses can be found at: <http://www.aqmd.gov/ceqa/hdbk.html>. In the event that the revised air quality analysis demonstrates that the project will result in significant air quality impacts SCAQMD staff recommends that the Lead Agency include air quality mitigation measures pursuant to Section 15126.4 of the CEQA guidelines.

Operational Emissions Impacts

2. In Table 22 (page 145) of the Draft MND the Lead Agency indicates that the proposed project will result in an increase of CO₂ emissions. This increase in emissions is a direct result of a improved level of service (LOS) on SR 60 between Gilman Springs Road and Jack Rabbit Trail Road in Riverside County. Consequently, the proposed project could likely result in an increase of criteria pollutants. Therefore, the SCAQMD staff recommends that the Lead Agency quantify the potential increase of criteria pollutant emissions during operation of the project from the aforementioned LOS improvements.

Growth Inducing Potential and Cumulative Impacts

3. The Lead Agency states that the SR 60 between Gilman Springs Road and Jack Rabbit Trail Road (project area) currently serves 47,600 vehicles per day, and that by 2040 this segment could serve up to 105,800 vehicles per day. Further, the Lead Agency states that construction of this project will improve freeway operations; however, this discussion ignores growth inducing potential and cumulative impacts from the project.

The project will construct additional freeway truck climbing lanes. Despite the argument that the proposed project will not generate additional trips, no enforceable measures have been included that will ensure additional trips will not occur. For example, if traffic increases beyond what is projected in this Draft MND, and more vehicles use this segment of SR 60, then the additional capacity that this project provides may result in additional air quality impacts. If the Lead agency chooses not

to assess this impact, than an enforceable measure is needed to ensure less than significant air quality impacts.

Further, while this project may not directly generate traffic, it could accommodate and potentially encourage growth. This type of indirect impact is “cumulatively considerable” under CEQA and must be analyzed by comparing existing conditions with future project conditions.