



South Coast Air Quality Management District

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Mitigated Negative Declaration (MND) for the State Route 55 (SR-55) Improvement Project Between Interstate 405 (I-405) and Interstate 5 (I-5)

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. The lead agency proposes to widen SR-55 in both directions from the I-405/SR-55 interchange to the I-5/SR-55 interchange.

The proposed project is adjacent to sensitive land uses¹ (i.e., residential dwellings north, south, east, and west of the project site); however, the MND did not evaluate potential localized air quality impacts that could result from the proposed project. These potential air quality impacts should be assessed using SCAQMD's Localized Significance Methodology in the Final MND.

Additionally, the widening of SR-55 will bring traffic lanes closer to the adjacent sensitive land uses. SR-55 has an average daily traffic volume of 261,600 vehicles, which includes more than 6,000 diesel trucks. Because of the close proximity to the freeway widening, residents would be exposed to diesel particulate matter, which is a toxic air contaminant. The SCAQMD staff therefore recommends that the lead agency conduct a mobile source health risk assessment (HRA)² to disclose the potential health risks to the residents from vehicles that use the freeway including diesel-fueled vehicles that emit diesel particulate matter, which the California Air Resources Board (CARB) has determined to be carcinogenic.

The lead agency states that construction-related daily emissions would not exceed the regional SCAQMD thresholds from criteria pollutants during any individual construction phase. However, the air quality impacts from construction are underestimated because the air quality analysis does not account for overlapping construction phases. Table 2.13.4 – Peak Day Construction Emissions only summarizes the emissions by construction phases. SCAQMD staff recommends revising the air quality analysis to account for overlapping construction phases, if applicable, and comparing the peak impacts to SCAQMD's CEQA significance thresholds for construction.

In the event that overlapping construction phases exceed SCAQMD thresholds, SCAQMD staff recommends that the lead agency require mitigation to minimize these impacts to a less than significant level. Additional details are included in the attachment.

¹ California Air Resources Board. April 2005. "Air Quality and Land Use Handbook: A Community Health Perspective." Accessed at: <http://www.arb.ca.gov/ch/landuse.htm>

² "Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis" Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>