



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Mitigated Negative Declaration (MND) for the Proposed Soto Street Roadway Widening Project from Multnomah Street to Mission Road

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes improvements to Soto Street, including widening the street from three lanes to four and constructing a 2,500 foot storm drain culvert. The project is located along Soto Street between Multnomah Street and Mission Road in the community of El Sereno-Lincoln Heights-Hillside Village.

SCAQMD Staff's Summary of Air Quality Analysis

The Lead Agency determined that the proposed project would result in less than significant regional and localized air quality impacts during construction and operation. The Lead Agency relies on air quality mitigation measures AQ-1 through AQ-14 to avoid significant localized air quality impacts during the construction phase of the proposed project.

SCAQMD Staff's Comments

Based on the South Coast Air Quality Management District (SCAQMD) staff's review of the air quality analysis (Appendix B: Air Quality & Greenhouse Gas Impact Analysis) it appears that the Lead Agency assumed the use of Tier 3 off-road construction equipment in the California Emissions Estimator Model (CalEEmod). However, the use of Tier 3 off-road construction equipment was not incorporated as a mitigation measure in the list of air quality mitigation measures AQ-1 through AQ-14. Therefore, SCAQMD staff recommends that the Lead Agency incorporate a mitigation measure in the final CEQA document that requires the use of tier 3 off-road construction equipment during the proposed project's construction period. This will ensure that the assumptions used to quantify the proposed projects air quality impacts in CalEEmod and ultimately determine the projects construction-related air quality impacts are consistent with the final CEQA document. Further, inclusion of the mitigation measure will ensure that it is enforceable according to the CEQA Guidelines, Section 21081.6 (b). SCAQMD staff recommends that the mitigation measure be incorporated as follows:

- **AQ-15:** Off-road, diesel powered construction equipment used during all phases of the proposed project's construction shall meet or exceed the CARB and USEPA Tier 3 off-road emissions standards for equipment rated at 50 horsepower or greater. A copy of the fleet's tier compliance documentation, and CARB or SCAQMD operating permits, if applicable, shall be provided to the lead agency at the time of mobilization of each applicable unit of equipment. This requirement will be included as a bid or contract specification with contractors. Required periodic reporting and provision of written documents by contractors to will prove and ensure compliance.

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 Alina Mullins, Assistant Air Quality Specialist, at amullins@aqmd.gov, if you have any questions.

Sincerely,

Daniel Garcia

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Planning, Rule Development & Area Sources

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