

Memorandum

To: Transportation Conformity Working Group

From: Chad Costello-SANBAG / Sam Silverman-Terry A. Hayes Associates Inc. / Dave Speirs-Parsons

Cc: Tony Louka-Caltrans

Date: 2-18-2016

**Subject: I-10 Corridor Project – PM Hot-Spot Review
EA 0C2500, EFIS ID 0800000040
Summary of Interagency Coordination
Determination “Not a Project of Air Quality Concern”**

The purpose of this memo is to provide a summary of the coordination with the Transportation Conformity Working Group (TCWG) regarding the I-10 Corridor Project, leading to the determination that the project is not a Project of Air Quality Concern (not a POAQC).

Background:

The following is a summary of submittals, conference calls, and interagency coordination regarding the PM Hot Spot Review process for the I-10 Corridor Project.

June 2014	Submitted PM Hot-Spot Form to TCWG - (from preliminary information, the project was thought to be a POAQC)
July 2014	Submitted PM Hot-Spot Modeling Protocol to TCWG
Dec 2014	TCWG approval of Modeling Protocol
Aug 2015	Submitted Quantitative PM2.5 and PM10 Hot-Spot Analysis to TCWG
Oct 2015	Conference call (EPA/AQMD/Caltrans/FHWA/Project Team)
Nov 2015	(2) Conference Calls (EPA/AQMD/Caltrans/FHWA/Project Team)
Jan 2016	Submitted Addendum No. 1 – Quantitative PM2.5 and PM 10 Hot-Spot Analysis, 1-11-2016 Received EPA comments via email, 1-15-2016 Submitted Responses to EPA comments, 1-19-2016 Conference call (EPA/AQMD/Caltrans/FHWA/Project Team), 1-29-2016

Discussion:

As noted above, there has been extensive coordination with the agencies represented at the TCWG regarding this project. The technical details regarding this coordination are documented in the documents referenced below. Pursuant to the discussions during the conference call held on January 29, 2016, the project was determined to be “not a POAQC.” The project team will reflect this determination in the Draft Environmental Document (DED), which will be circulated for public review in the coming months. In addition, per the recommendation of the TCWG, the DED will include information regarding the traffic data that was the basis for the determination of “Not a POAQC”.

The projects sponsor – San Bernardino Associated Governments, (SANBAG), and the project team – including Caltrans, Parsons, and Terry Hayes A. Associates Inc. – are very grateful for the all of the support and assistance provided by EPA, AQMD, FHWA to resolve the questions regarding the traffic data and PM hot-spots review.

Reference Documents:

- PM Conformity Hot-Spot Analysis Project Summary Form for Interagency Consultation (June 24, 2014)
- PM Hot-Spot – Modeling Protocol (July 2014)
- Quantitative PM2.5 and PM10 Hot-Spot Analysis to TCWG (Aug 2015)
- Addendum No. 1 - Quantitative PM2.5 and PM 10 Hot-Spot Analysis (1-11-2016)
- 2034 Modeling Results – Responses to Comments (1-19-2016)
- Email from Matthew Lakin, Ph.D. Acting Deputy Director, Air Division, US EPA, Region (2-16-2016)

Attachments:

- Email from EPA Dated 2-16-2016

ATTACHMENTS – Email from EPA

From: Lakin, Matt [mailto:Lakin.Matthew@epa.gov]

Sent: Tuesday, February 16, 2016 10:23 AM

To: Speirs, David; tony.louka@dot.ca.gov

Cc: OConnor, Karina; Dunning, Connell; LOWE, DEBBIE; Rongsheng Luo; Yanlin Zhou; Berry, Laura; msheffer@aqmd.gov; IMACMILLAN@aqmd.gov; rodney.tavitas@dot.ca.gov; Daniel Tran; Sreedhar Nambisan; 'Chad Costello'; 'Garry Cohoe'; 'Sam Silverman'; Ryan'; JBeeman@vcsenvironmental.com; raghuram.radhakrishnan@dot.ca.gov; Joseph.Vaughn@dot.gov; Michael.Claggett@dot.gov; Jillian Wong

Subject: Re: Rescheduled I-10 Corridor Project Follow-up Teleconference *** Response to Truck Diversion Questions during the 1-29-2016 conference call ***

David and Tony,

Thank you so much for all of your work putting together the additional traffic modeling results for traffic diverted to SR-60. The Heavy, Medium and Truck distribution data was important to help us determine the full impacts associated with the addition of the build alternative on I-10. As mentioned in our last conference call, we strongly encourage you to disclose this information in the environmental documentation for this project.

Based on our review of all of the traffic analysis data for the build alternatives for the I-10 project, we consider the I-10 project to not be a project of air quality concern under the transportation conformity regulations, 93.123(b)(i) since it is an expanded highway project that does not result in a significant increase in diesel vehicles.

Note that in all previous conference calls on this project, we have raised technical issues with the air quality dispersion modeling previously completed for this project. Since the project is not a project of air quality concern, a full quantitative hot-spot demonstration required by §93.116 of the transportation conformity regulations is not required. However, if the modeling is included in the NEPA documents, we would raise these comments again.

Thanks again. If you have any questions, please call me at (415) 972-3851.

Matt

Matthew Lakin, Ph.D.

Acting Deputy Director, Air Division

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