



**Air Quality Analysis for the  
Imperial Avenue Extension Project  
Imperial Avenue and Interstate 8  
El Centro, California  
11-IMP-8-R37.0  
EA 07900**

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# Executive Summary

The City of El Centro proposes to extend Imperial Avenue from Interstate 8 (I-8) to McCabe Road, within the city of El Centro in Imperial County, California. The proposed 1.36-mile roadway extension would function as a 4-lane divided arterial (with a left turn lane) from I-8 to Wake Avenue, a 2-lane Arterial (with a left turn lane) from Wake Avenue to Valleyview Avenue and a 2-lane arterial (without a left turn lane) from Valleyview Avenue to McCabe Road. The project would also construct a 2-lane collector segment to connect the separated segments of Wake Avenue located west and east of the Imperial Avenue alignment. The project would be phased as follows with construction of each phase lasting one year: Phase I: 1-8 to Wake Avenue intersection, Phase II: Wake Avenue intersection to Danenberg Drive intersection, Phase III: Danenberg Drive intersection to Valleyview Avenue intersection, and Phase IV: Valleyview Avenue intersection to McCabe Road intersection along Imperial Avenue.

The project site is located in the city of El Centro within Imperial County, within the Salton Sea Air Basin, which currently meets the federal standards for all criteria pollutants, except ozone ( $O_3$ ), particulate matter sized 10 microns or less ( $PM_{10}$ ), and particulate matter sized 2.5 microns or less ( $PM_{2.5}$ ). Imperial County has been designated as a moderate non-attainment area for the federal 8-hour ozone standard and a serious non-attainment area for the federal  $PM_{10}$  standard. The city of El Centro and the project site are also located in the portion of Imperial County that has been designated as a moderate non-attainment area for the federal  $PM_{2.5}$  standard.

Similarly, Imperial County meets the California standards for all criteria pollutants, except ozone,  $PM_{10}$ , and  $PM_{2.5}$ . Therefore, Imperial County has been designated as a state non-attainment area for ozone and  $PM_{10}$ . The State of California has not yet issued a non-attainment status for  $PM_{2.5}$ .

The Clean Air Act requires a demonstration that federal actions conform to the State Implementation Plan (SIP) and similar approved plans in areas that are designated as non-attainment or have maintenance plans for criteria pollutants. Transportation measures, such as the proposed action, are analyzed for conformity with the SIP as part of Regional Transportation Plans (RTPs) and Regional Transportation Improvement Programs (RTIP). Table S-1 identifies the status of the SIP.

MPOs are responsible for the preparation of RTPs and RTIPs, and the associated air quality analyses. The Metropolitan Planning Organization (MPO) is responsible for the preparation of RTPs and RTIPs and the associated air quality analyses in the project area is the Southern California Association of Governments (SCAG).

<b>Table S-1 Status of State Implementation Plan in Imperial County</b>	
Pollutants	Status
Ozone (O <sub>3</sub> )	<p>In July 1997, the U.S. Environmental Protection Agency (USEPA) established a new federal 8-hour standard for ozone (O<sub>3</sub>) of 0.080 parts per million (ppm). The USEPA designated 15 areas in California that violate the federal 1997 8-hour O<sub>3</sub> standard on April 15, 2004. Each nonattainment area’s classification and attainment deadline is based on the severity of its O<sub>3</sub> problem. The USEPA designated Imperial County as a marginal non-attainment area. Subsequently, on February 13, 2008, the USEPA found that failed to meet the attainment date for the 1997 8-hour O<sub>3</sub> standard by the deadline of June 15, 2007, and as a result was reclassified as a moderate non-attainment area. On December 3, 2009, based on air monitoring data for the years 2006 through 2008, the USEPA issued a final ruling determining that Imperial County attained the 1997 8-hour O<sub>3</sub> standard. This determination did not constitute a re-designation to attainment under the Clean Air Act (CAA) Section 107(d)(3). As such, Imperial County was required to prepare the <i>Final 2009 1997 8-Hour Ozone Modified Air Quality Management Plan</i> (2009 Ozone AQMP). The 2009 Modified AQMP was adopted by the Imperial County Air Pollution Control District (APCD) in July 2010 along with the <i>2009 Reasonably Available Control Technology State Implementation Plan</i>. Both plans were approved by the California Air Resources Board (ARB) in November 2010 and sent to the USEPA as revisions to the California SIP. Together, these plans addressed the CAA requirement for areas of moderate non-attainment for the 1997 8-hour O<sub>3</sub> standard.</p> <p>In March 2008, the USEPA revised the 8-hour O<sub>3</sub> standard to 0.075 ppm, and the 1997 8-hour O<sub>3</sub> standard was revoked effective April 6, 2015. Imperial County was initially classified as a marginal non-attainment area for the 2008 8-hour O<sub>3</sub> standard, but having missed the attainment date of July 20, 2015, was reclassified as a moderate non-attainment area. Therefore, as required, the <i>Draft Imperial County 2017 State Implementation Plan for the 2008 8-Hour Ozone Standard</i> (2017 Ozone SIP) was prepared demonstrating how the region would show attainment of the 2008 O<sub>3</sub> standard as expeditiously as practicable, but no later than Jul 20, 2018. The Draft 2017 Ozone SIP was released to the public, and Imperial County is currently conducting public hearings to consider adoption.</p>
Inhalable Particulate Matter (PM <sub>10</sub> )	<p>In August 2004 the USEPA found that the Imperial County particulate matter sized 10 microns or less (PM<sub>10</sub>) non-attainment area had failed to attain by the moderate area attainment date of December 31, 1994, and as a result reclassified Imperial County from a moderate to a serious PM<sub>10</sub> non-attainment area. The USEPA proposed a rule to find that the area had failed to attain the annual and 24-hour PM<sub>10</sub> standards by the serious area deadline of December 31, 2001. The USEPA required the County to submit an air quality plan by December 11, 2008. Imperial County prepared the <i>Final 2009 Imperial County State Implementation Plan for Particulate Matter Less Than 10 Microns in Aerodynamic Diameter</i>, dated August 11, 2009, which accounts for revised transportation conformity budgets.</p>
Fine Particulate Matter (PM <sub>2.5</sub> )	<p>The USEPA determined that Imperial County was in attainment of the 1997 particulate matter less than 2.5 microns (PM<sub>2.5</sub>) standard of 65 micrograms per cubic meter (µg/m<sup>3</sup>). However, on October 17, 2006, the USEPA strengthened the primary and secondary 24-hour PM<sub>2.5</sub> standard to 35 µg/m<sup>3</sup>. The USEPA designated Imperial County as a moderate non-attainment area for the 2006 PM<sub>2.5</sub> standard and required Imperial County to submit a PM<sub>2.5</sub> SIP by the end of December 2014. As such, Imperial County prepared the <i>Final Imperial County 2013 State Implementation Plan for the 2006 24-Hour PM<sub>2.5</sub> Moderate Nonattainment Area</i>, dated December 2, 2014, which was approved by the ARB December 18, 2014.</p>
Sources: Imperial County APCD 2009, 2010a, 2010b, 2014, 2017	

The Federal Statewide Transportation Improvement Program is a federally-approved combination of individual Federal Transportation Improvement Programs (FTIP) developed by regions throughout California. The most recently approved Federal Statewide Transportation Improvement Program is the *2017 Federal Statewide Transportation Improvement Program, Covering Federal Fiscal Years 2016/17 through 2019/20* (California Department of Transportation 2017). The currently applicable RTP and RTIP for the project area are the following: the 2016–2040 RTP/Sustainable Communities Strategy (2016 RTP/SCS), adopted by SCAG in April 2016 (SCAG 2016a), and the Final 2017 FTIP, through Amendment 12 (2017 FTIP), adopted by SCAG in September 2016 (SCAG 2016b). The 2017 FTIP has been amended 12 times since the original approval. The U.S. Department of Transportation, Federal Highway Administration made a finding of conformity for the 2017 FTIP and a conformity redetermination for the 2016 RTP/SCS on December 16, 2016 (U.S. Department of Transportation 2016a and 2016b).

The project is included in the 2016 RTP/SCS (RTP ID 1161L001) and in the 2017 FTIP Amendment 17-03 (FTIP ID IMP160901, Program CAX66). The project was originally described in the 2016 RTP/SCS as a “new roadway from I-8 to McCabe Road. Phase 1 includes 6 new lanes on Imperial Avenue from I-8 to Wake Avenue; and 2 new lanes on Wake Avenue from Imperial Avenue to Cypress Drive” (Attachment 1). The 2016 RTP/SCS Amendment 1 removed the discussion of Phase 1 from the project description and only described the project as a “new roadway from I-8 to McCabe Road” (see Attachment 1).

The project has subsequently been down-scoped to four new lanes on Imperial Avenue from I-8 to Wake Avenue. Although the project is inconsistent with the description in the 2016 RTP/SCS, the project is conforming because it would build fewer lanes than originally anticipated, would not exceed the emissions budget for the project, and is consistent with the 2017 FTIP (see below). Additionally, it is anticipated that 2016 RTP/SCS Amendment 3 will receive Federal approval in December 2018, which will include a revised description of Phase 1 of the project as four new lanes on Imperial Avenue from I-8 to Wake Avenue, consistent with the 2017 FTIP.

The project has the following description in the 2017 FTIP: Imperial Avenue Extension South – New roadway from I-8 to McCabe Road. Phase 1 includes four new lanes on Imperial Avenue from I-8 to Wake Avenue; and two new lanes on Wake Avenue from Imperial Avenue to Cypress Drive (see Attachment 1). The complete descriptions as listed in the 2016 RTP/SCS and the 2017 FTIP are included in Attachment 1. On April 6, 2017, SCAG adopted the 2016 RTP/SCS Amendment 1 and the 2017 FTIP Amendment 17-03 via Resolution No. 17-588-2, and the conformity analysis indicated that all air quality conformity requirements have been met. The FHWA also made a finding of conformity on the 2016 RTP/SCS Amendment 1 and the 2017 FTIP Amendment 17-03 on May 12, 2017, included as Attachment 2.

The design concept and scope of the project are consistent within the scope of the project description that will be included in the 2016 RTP/SCS Amendment 3 anticipated to receive Federal approval in December 2018, as well as the project description in the 2017 FTIP, and the assumptions in the SCAG regional emissions analysis. Therefore, the project is

assumed to conform to the SIP and no adverse regional or local air quality impact would occur as a result of the project. Furthermore, implementation of the project would ensure that the City would be consistent with the 2016 SCAG RTP/SCS and 2017 FTIP.

Project construction activities, potential impacts, and measures to avoid or minimize the impacts are discussed in this analysis. Recommended pollution abatement measures are included in the analysis. All California Department of Transportation standard specifications for construction mitigation, including measures in the SIP and air district rules, would be implemented.

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1: 2016 Regional Transportation Plan/Sustainable Communities Strategy and Federal  
 Transportation Improvement Program Listings  
 2: Conformity Determination for Southern California Association of Governments’ 2016  
 Regional Transportation Plan/Sustainable Communities Strategy Amendment No.  
 1 and 2017 FTIP Consistency Amendment No.17-03 Approval  
 3: Southern California Association of Governments’ Transportation Conformity  
 Working Group Project of Air Quality Concern Determination

## Acronyms

$\mu\text{g}/\text{m}^3$	micrograms per cubic meter
2017 FTIP	2017 Federal Transportation Improvement Program
AADT	annual average daily traffic
AB	Assembly Bill
ADT	average daily traffic
APCD	Air Pollution Control District
AQMP	Air Quality Monitoring Plan
ARB	California Air Resources Board
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
CCAA	California Clean Air Act
CDC	California Department of Transportation
CFR	Code of Federal Regulations
City	City of El Centro
CO	carbon monoxide
$^{\circ}\text{C}$	degrees Celsius
$^{\circ}\text{F}$	degrees Fahrenheit
FHWA	Federal Highway Administration
FTIP	Federal Transportation Improvement Program
I-8	Interstate 8
IRIS	Integrated Risk Information System
LLG	Linscott, Law & Greenspan
LOS	Level of Service
MPOs	Metropolitan Planning Organization
MSAT	Mobile Source Air Toxics
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NESHAP	National Emissions Standards for Hazardous Air Pollutants
$\text{NO}_2$	nitrogen dioxide
$\text{NO}_x$	oxides of nitrogen
Pb	Lead
PM	particulate matter
$\text{PM}_{10}$	particulate matter with an aerodynamic diameter of 10 microns or less
$\text{PM}_{2.5}$	particulate matter with an aerodynamic diameter of 2.5 microns or less
ppb	parts per billion
ppm	parts per million
ROG	reactive organic gas
ROW	Right-of-Way
RTIP	Regional Transportation Improvement Program
RTP	Regional Transportation Plan
SCAG	Southern California Association of Governments
SCS	Sustainable Communities Strategy
SIP	State Implementation Plan
SMAQMD	Sacramento Metropolitan Air Quality Management District
$\text{SO}_2$	sulfur dioxide

SO <sub>x</sub>	oxides of sulfur
SR-86	State Route 86
SSAB	Salton Sea Air Basin
TAC	toxic air contaminant
TCWG	Transportation Working Group
USC	United States Code
USEPA	United States Environmental Protection Act
VMT	vehicle miles travelled
VMT	Vehicle miles travelled
VOC	volatile organic compounds
WRCC	Western Regional Climate Center

## 1.0 Introduction

The City of El Centro (City) proposes to extend Imperial Avenue from Interstate 8 (I-8) to McCabe Road, within the city of El Centro in Imperial County, California. The proposed 1.36-mile roadway extension would function as a 4-lane divided arterial (with a left turn lane) from I-8 to Wake Avenue, a 2-lane arterial (without a left turn lane) from Wake Avenue to Valleyview Avenue and a 2-lane arterial (without left turn lane) from Valleyview Avenue to McCabe Road. The project would also construct a 2-lane Collector segment to connect the separated segments of Wake Avenue, located west and east of the Imperial Avenue alignment. The project would be phased as follows with construction of each phase lasting one year: Phase I: I-8 to Wake Avenue intersection, Phase II: Wake Avenue intersection to Danenberg Drive intersection, Phase III: Danenberg Drive intersection to Valleyview Avenue intersection, and Phase IV: Valleyview Avenue intersection to McCabe Road intersection along Imperial Avenue.

The purpose of this air quality analysis is to describe the existing regional and local air quality of the project area, identify the potential air quality impacts of the project, and demonstrate air quality conformity of the project with the State Implementation Plan (SIP), as required by the federal Clean Air Act (CAA). This report also identifies measures to mitigate or minimize pollutant emissions that could occur during project construction.

### 1.1 Project Needs and Objectives

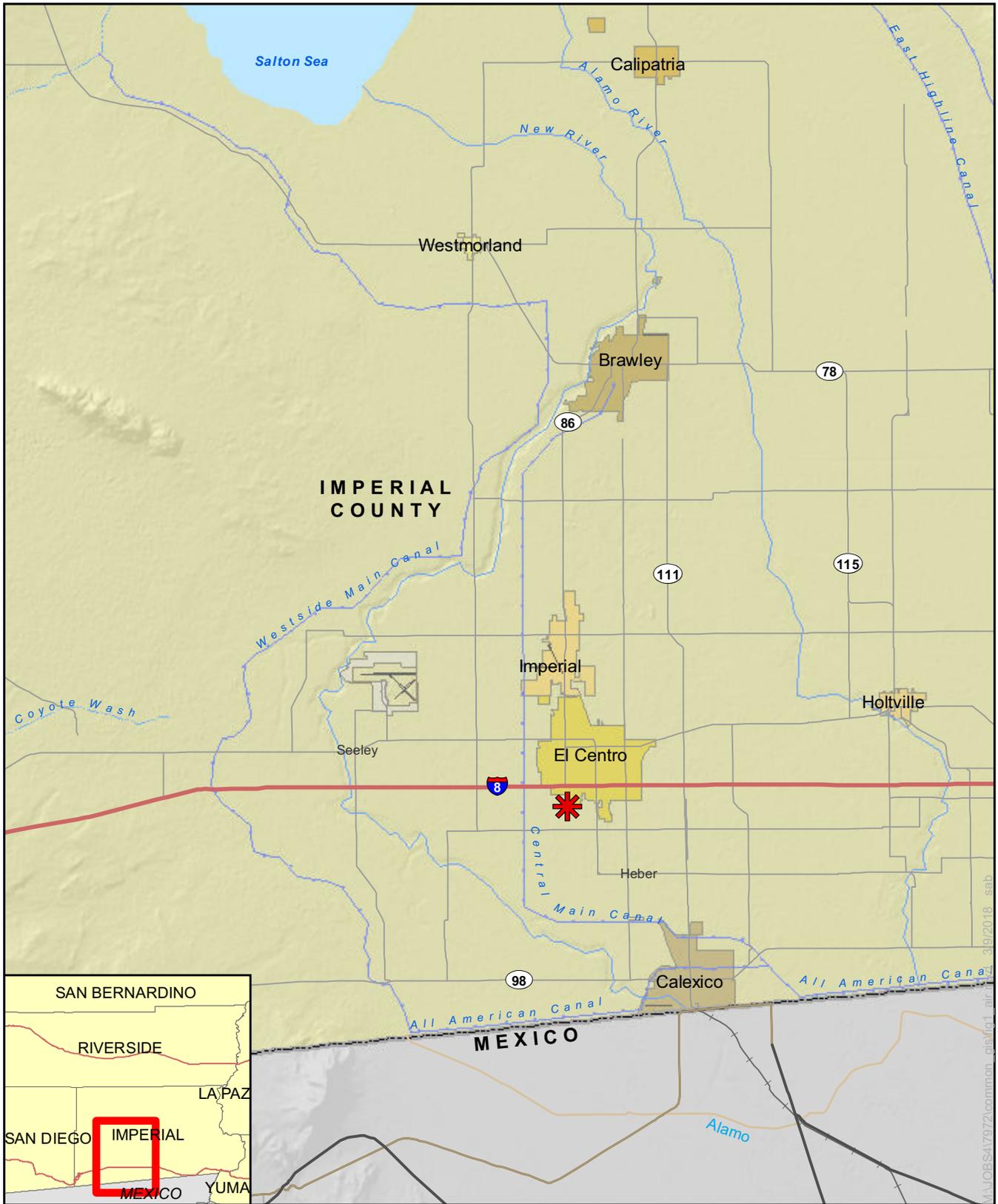
The purpose of the project is to accommodate existing and planned growth and traffic circulation system improvements within the city of El Centro and local unincorporated Imperial County area south of the I-8/Imperial Avenue interchange. The project would also have beneficial results by resolving existing traffic network deficiencies within the city and reducing congestion on 4th Street (State Route 86 [SR 86]), which is one of the most heavily traveled transportation corridors in the city. Imperial Avenue is a major north-south route through the city, with a southern terminus at the intersection with I-8.

Motorists heading south and east from Imperial Avenue must travel along I-8 and exit one mile away at 4th Street (SR 86), which exacerbates the existing congested traffic condition at the 4th Street (SR 86)/I-8 interchange. Motorists heading west from Imperial Avenue must travel along I-8 and exit three miles away at Forrester Road.

### 1.2 Project Location and Setting

The project site is located south of I-8 and north of McCabe Road in the southern portion of the city of El Centro (Figure 1). The alignment of the proposed roadway extension follows the same linear pathway as the existing portion of Imperial Avenue north of I-8. The project site is relatively flat, and consists primarily of a narrow north-south corridor of vacant land with sparse vegetation. A small portion of land within the southernmost segment of this corridor along the eastern project boundary is currently in agricultural production.

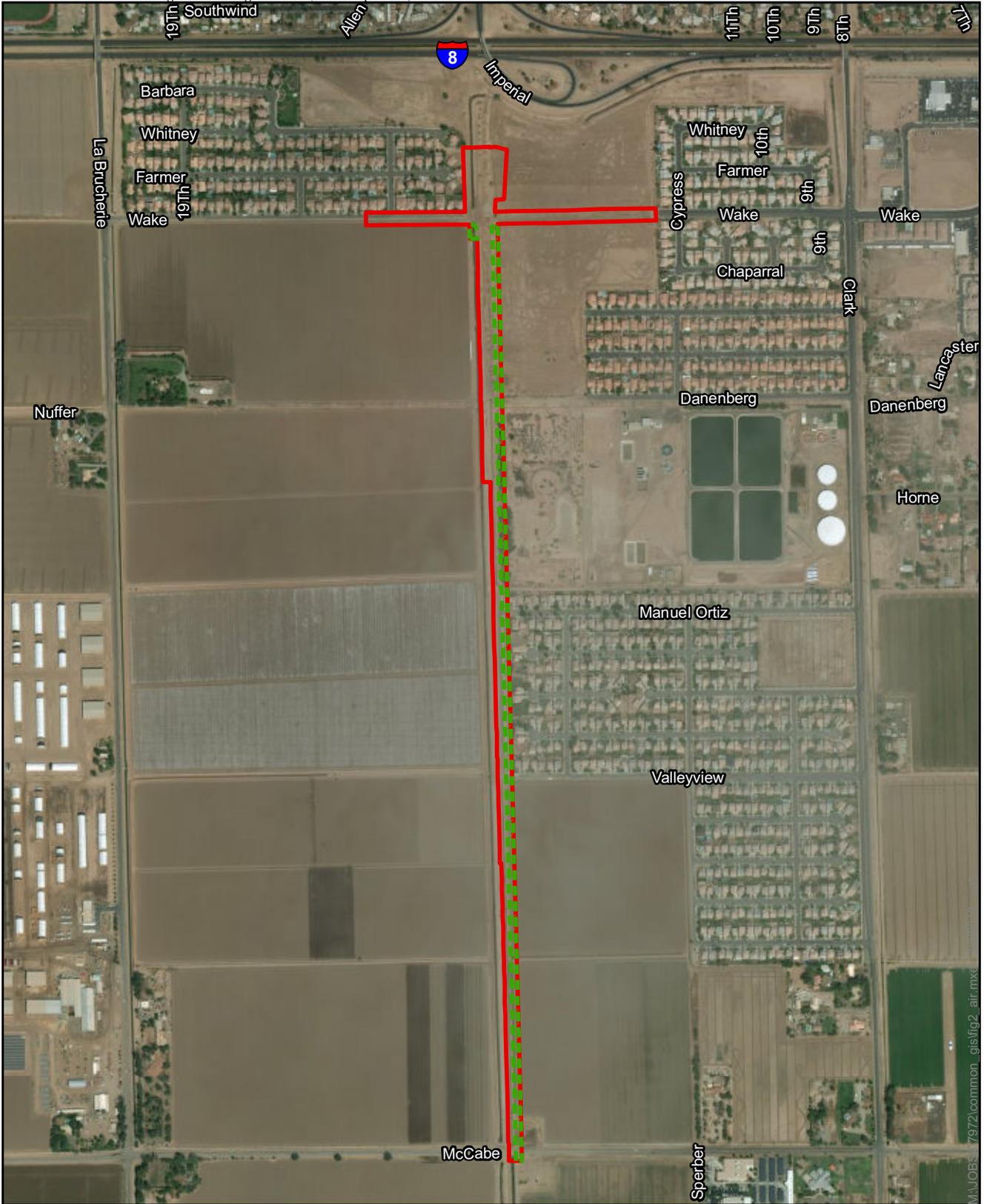
The project site also includes a paved segment of Wake Avenue and vacant land with sparse vegetation that would be developed for extensions of Wake Avenue (Figure 2).



 Project Location

**FIGURE 1**  
Regional Location

Image Source: DigitalGlobe (flown Sept 2016)



-  Project Boundary
-  Public Utility Easement

FIGURE 2  
Project Location on Aerial Photograph

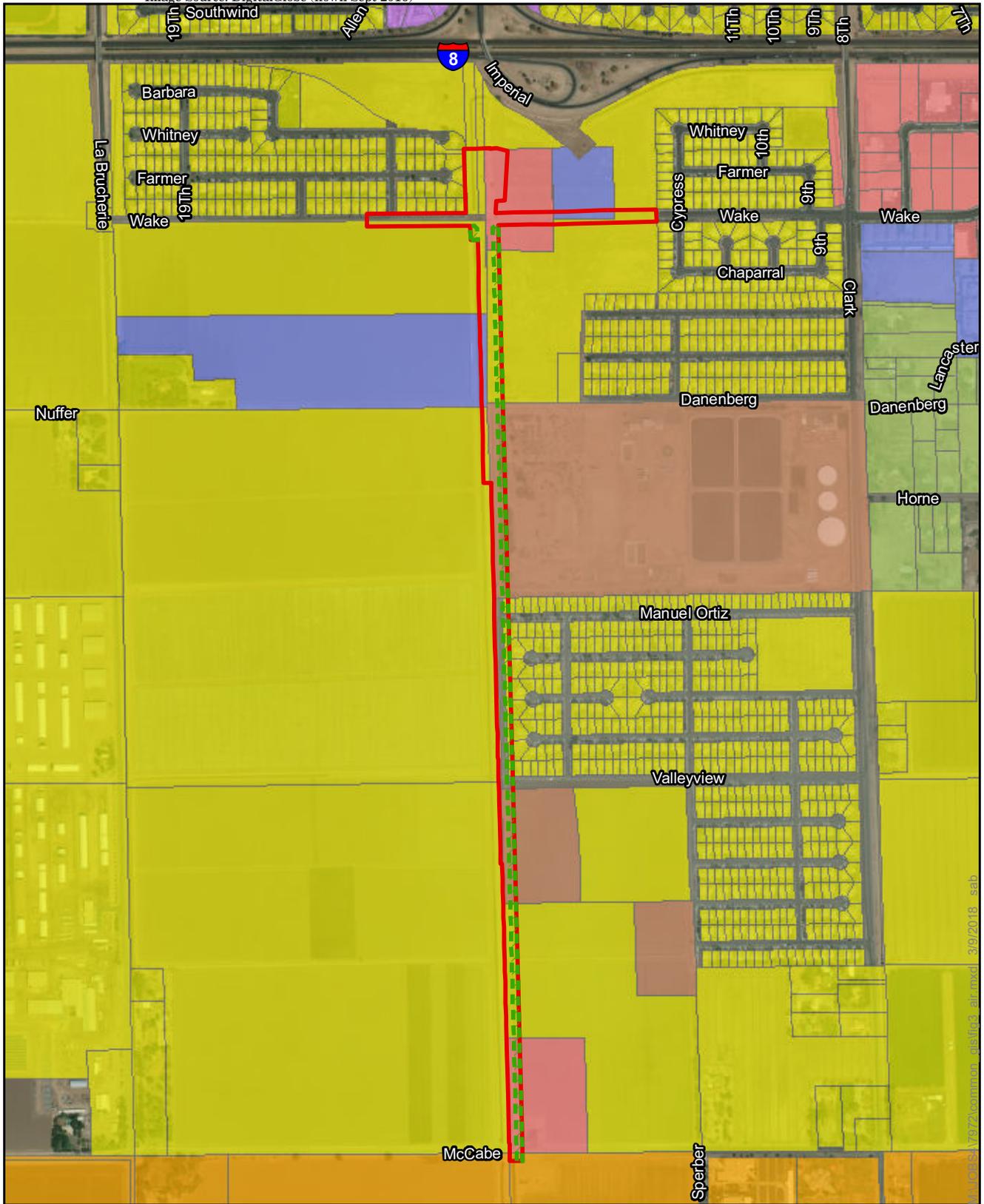
The project site is surrounded by existing residential development, active farmland, and agricultural drains (Figure 3). Existing residential development is located northwest, northeast, and southeast of the future intersection of Imperial Avenue and Wake Avenue. Existing residential development is also located east of the project site from the northern terminus to Danenberg Drive, and from Manuel Ortiz Avenue to Valleyview Avenue. All other land west of the project site south of the future intersection of Imperial Avenue and Wake Avenue to the southern terminus, east of the project site from Valleyview Avenue to the southern terminus, and south of the project site consists of active farmland. A water treatment plant is located east of the project south of the future intersection with Danenberg Drive. The Date Drain, which consists of an earthen agricultural drain, runs parallel along the entire western edge of the proposed Imperial Avenue extension. A water treatment plant is located east of the project south of the future intersection with Danenberg Drive. The Dahlia Lateral, which consists of a concrete lined agricultural drain, runs parallel along the eastern edge of the proposed Imperial Avenue extension from Danenberg Drive to McCabe Road. Land north of the project site consists of an elevated roadway berm supporting I-8.

The project would extend Imperial Avenue from I-8 to McCabe Road. The proposed 1.36-mile roadway extension would function as a 4-lane divided arterial (with a left turn lane) from I-8 to Wake Avenue, a 2-lane arterial (with a left turn lane) from Wake Avenue to Valleyview Avenue, and a 2-lane arterial (without a left turn lane) from Valleyview Avenue to McCabe Road. The project would introduce a median varying in width from 12 to 14 feet between I-8 and Danenberg Drive, and then consistently 12 feet in width from Danenberg Drive to McCabe Road. The project would construct a 5.5-foot sidewalk along the entire length of the eastern project boundary and would introduce native backing on both sides of the proposed roadway. The project would be phased as follows with construction of each phase lasting one year:

- Phase I: I-8 off-ramp to Wake Avenue intersection
- Phase II: Wake Avenue intersection to Danenberg Drive intersection
- Phase III: Danenberg Drive intersection to Valleyview Avenue intersection
- Phase IV: Valleyview Avenue intersection to McCabe Road intersection

The project would also construct a 2-lane Collector segment to connect the separated pieces of Wake Avenue located west and east of the Imperial Avenue alignment. The project would underground an approximately 100-foot segment of the Date Drain south of the future intersection of Imperial Avenue and Wake Avenue. The undergrounded segment of the Date Drain would continue to convey water beneath the project improvements. The project would underground the Dahlia Canal Lateral 1 that runs parallel along the entire eastern edge of the project site. The undergrounded Dahlia Canal Lateral 1 would continue to convey water beneath the project improvements.

Image Source: DigitalGlobe (flown Sept 2016)



- |   |   |
|---|---|
|  Project Boundary        |  High-Medium Density Residential |
|  Public Utility Easement |  Public                          |
| <b>El Centro Land Use</b>   |   |
|  Low Density Residential |  Rural Residential               |
|  General Commercial      |  Tourist Commercial              |
|   |  Agriculture (Imperial County)   |



**FIGURE 3**  
Surrounding Land Uses

## 1.3 Sensitive Receptors

Some members of the population are especially sensitive to air pollutant emissions and should be given special consideration when evaluating air quality impacts from projects. These people include children, the elderly, and persons with preexisting respiratory or cardiovascular illness. Structures that house these persons (i.e., schools, hospitals, and nursing homes) are defined as sensitive receptors. Recreational land uses such as parks are also considered moderately sensitive to air pollution. Exercise places a high demand on respiratory functions, which can be impaired by air pollution, even though exposure periods during exercise are generally short. There are existing single family residential developments located northwest of the future intersection of Imperial Avenue and Wake Avenue, east of the future alignment of Imperial Avenue from I-8 to Danenberg Drive, east of the future alignment of Imperial Avenue from Manuel Ortiz Avenue to Palmview Avenue, and north of I-8 (see Figure 3).

## 2.0 Air Pollutants

“Air Pollution” is a general term that refers to one or more chemical substances that degrade the quality of the atmosphere. Individual air pollutants may adversely affect human or animal health, reduce visibility, damage property, and reduce the productivity or vigor of crops and natural vegetation.

Six air pollutants have been identified by the United States Environmental Protection Agency (USEPA) as being of concern nationwide: carbon monoxide (CO); ozone (O<sub>3</sub>); nitrogen dioxide (NO<sub>2</sub>); sulfur dioxide (SO<sub>2</sub>); lead (Pb); and particulate matter (PM), which is subdivided into two classes based on particle size, fine particles (PM<sub>2.5</sub>), and inhalable particles (PM<sub>10</sub>). These pollutants are collectively referred to as criteria pollutants and are discussed in detail below. The sources of these pollutants, their effects on human health and the nation’s welfare, and their final deposition in the atmosphere vary considerably.

NO<sub>x</sub> and ROG are known as the chief “precursors” of ozone. These compounds react in the presence of sunlight to produce O<sub>3</sub>. In the Salton Sea Air Basin (SSAB), ambient concentrations of CO and O<sub>3</sub> are primarily influenced by motor vehicle activity. Emissions of sulfur oxides (SO<sub>x</sub>) are associated mainly with various stationary sources. Emissions of nitrogen oxides (NO<sub>x</sub>) and particulate matter come from both mobile and stationary sources.

The criteria pollutants that are most important for this air quality impact analysis are those that can be traced principally to motor vehicles and to earth-moving activities. Of these pollutants, CO, ROG, NO<sub>x</sub>, PM<sub>2.5</sub>, and PM<sub>10</sub> are evaluated on a regional or “mesoscale” basis. CO is also often analyzed on a localized or “microscale” basis in cases of congested traffic conditions. The Federal Highway Administration (FHWA) and USEPA released joint guidance for conducting quantitative analyses to evaluate microscale impacts of PM<sub>2.5</sub> and PM<sub>10</sub> in November 2015 (FHWA 2015). The guidance describes how to

complete a quantitative hot spot analyses for certain highway and transit projects, and provides technical guidance on estimating project emissions.

In addition to the criteria pollutants, toxic air contaminants (TACs), asbestos, and greenhouse gases are air pollutants of concern.

## 2.1 Carbon Monoxide

CO is a colorless and odorless gas which, in the urban environment, is associated primarily with the incomplete combustion of fossil fuels in motor vehicles. Relatively high concentrations are typically found near crowded intersections and along heavily used roadways carrying slow-moving traffic. Even under the severest meteorological and traffic conditions, high concentrations of CO are limited to locations within a relatively short distance (300 to 600 feet) of heavily traveled roadways. Overall, CO emissions are decreasing as a result of the Federal Motor Vehicle Control Program, which has mandated increasingly lower emission levels for vehicles manufactured since 1973. CO concentrations are typically higher in winter. As a result, California has required the use of oxygenated gasoline in the winter months to reduce CO emissions.

## 2.2 Ozone

O<sub>3</sub> is the principal component of smog and is formed in the atmosphere through a series of reactions involving ROG and NO<sub>x</sub> in the presence of sunlight. ROG and NO<sub>x</sub> are called precursors of O<sub>3</sub>. NO<sub>x</sub> includes various combinations of nitrogen and oxygen, including nitrogen oxide (NO), NO<sub>2</sub>, Nitrate (NO<sub>3</sub>), etc. O<sub>3</sub> is a principal cause of lung and eye irritation in the urban environment. Significant O<sub>3</sub> concentrations are normally produced only in the summer, when atmospheric inversions are greatest and temperatures are high. ROG and NO<sub>x</sub> emissions are both considered critical in O<sub>3</sub> formation. Control strategies for O<sub>3</sub> have focused on reducing emissions from vehicles, industrial processes using solvents and coatings, and consumer products.

## 2.3 Nitrogen Dioxide

NO<sub>2</sub> is a product of combustion and is generated in vehicles and in stationary sources such as power plants and boilers. NO<sub>2</sub> can cause lung damage. As noted above, NO<sub>2</sub> is part of the NO<sub>x</sub> family and is a principal contributor to O<sub>3</sub> and smog.

## 2.4 Sulfur Dioxide

SO<sub>2</sub> is a combustion product, with the primary source being power plants and heavy industries that use coal or oil as fuel. SO<sub>2</sub> is also a product of diesel engine combustion. The health effects of SO<sub>2</sub> include lung disease and breathing problems for asthmatics. SO<sub>2</sub> in the atmosphere contributes to the formation of acid rain. In the SSAB, there is relatively little use of coal and oil; therefore, SO<sub>2</sub> is of lesser concern than in many other parts of the country.

## 2.5 Lead

Lead is a stable compound that persists and accumulates both in the environment and in animals. Previously, the lead used in gasoline anti-knock additives represented a major source of lead emissions to the atmosphere. The USEPA began working to reduce lead emissions soon after its inception, issuing the first reduction standards in 1973, which called for a gradual phase down of lead to one-tenth of a gram per gallon by 1986. The average lead content in gasoline in 1973 was 2 to 3 grams per gallon or about 200,000 tons of lead a year. In 1975, passenger cars and light trucks were manufactured with a more elaborate emission control system, which included a catalytic converter that required lead-free fuel. In 1995 leaded fuel accounted for only 0.6 percent of total gasoline sales and less than 2,000 tons of lead per year. Effective January 1, 1996, the CAA banned the sale of the small amount of leaded fuel that was still available in some parts of the country for use in on-road vehicles (USEPA 1996). Lead emissions have significantly decreased due to the near elimination of the use of leaded gasoline.

## 2.6 Particulate Matter

PM is a complex mixture of extremely small particles and liquid droplets. PM is made up of a number of components, including acids (such as nitrates and sulfates), organic chemicals, metals, and soil or dust particles. Natural sources of particulates include windblown dust and ocean spray.

The size of PM is directly linked to the potential for causing health problems. The USEPA is concerned about particles that are 10 micrometers in diameter or smaller because those are the particles that generally pass through the throat and nose and enter the lungs. Once inhaled, these particles can affect the heart and lungs and cause serious health effects. Health studies have shown a significant association between exposure to PM and premature death. Other important effects include aggravation of respiratory and cardiovascular disease, lung disease, decreased lung function, asthma attacks, and certain cardiovascular problems such as heart attacks and irregular heartbeat (USEPA 2016). Individuals particularly sensitive to fine particle exposure include older adults, people with heart and lung disease, and children. The USEPA groups PM into two categories, PM<sub>2.5</sub> and PM<sub>10</sub>, as described below.

### 2.6.1 Fine Particulate Matter

Fine particles, such as those found in smoke and haze, are 2.5 micrometers in diameter and smaller (PM<sub>2.5</sub>). Sources of fine particles include all types of combustion activities (motor vehicles, power plants, wood burning, etc.) and certain industrial processes. PM<sub>2.5</sub> is the major cause of reduced visibility (haze) in California. Control of PM<sub>2.5</sub> is primarily achieved through the regulation of emission sources, such as the USEPA's Clean Air Interstate Rule and Clean Air Visibility Rule for stationary sources; the 2004 Clean Air Non-road Diesel Rule, the Tier 2 Vehicle Emission Standards, and Gasoline Sulfur Program; or the

California Air Resources Board (ARB) Diesel Risk Reduction Plan and Goods Movement Reduction Plan.

## 2.6.2 Inhalable Particulate Matter

Inhalable particles (PM<sub>10</sub>) include both fine and coarse dust particles; the fine particles are PM<sub>2.5</sub>. Coarse particles, such as those found near roadways and dusty industries, are larger than 2.5 micrometers and smaller than 10 micrometers in diameter. Sources of coarse particles include crushing or grinding operations, and dust from paved or unpaved roads. The health effects of PM<sub>10</sub> are similar to PM<sub>2.5</sub>. Control of PM<sub>10</sub> is primarily achieved through the control of dust at construction and industrial sites, the cleaning of paved roads, and the wetting or paving of frequently used unpaved roads.

## 2.7 Toxic Air Contaminants

In addition to the criteria air pollutants, the USEPA also regulates TACs, also known as hazardous air pollutants. Concentrations of TACs are also used as indicators of ambient air quality conditions. A TAC is defined as an air pollutant that may cause or contribute to an increase in mortality or in serious illness, or that may pose a hazard to human health. TACs are usually present in minute quantities in the ambient air; however, their high toxicity or health risk may pose a threat to public health even at low concentrations. In general, for those TACs that may cause cancer, there is no concentration that does not present some risk. In other words, there is no threshold level below which adverse health impacts may not be expected to occur. This contrasts with the criteria air pollutants for which acceptable levels of exposure can be determined and for which the ambient standards have been established (see Table 1 in Section 3.1). Most TACs originate from human-made sources, including on-road mobile sources, non-road mobile sources (e.g., airplanes), area sources (e.g., dry cleaners), and stationary sources (e.g., factories or refineries).

### 2.7.1 Mobile Source Air Toxics

The CAA identified 188 TACs. The USEPA has assessed this expansive list of toxics and identified a group of 21 as Mobile Source Air Toxics (MSATs). The MSATs are compounds emitted from highway vehicles and non-road equipment. Some toxic compounds are present in fuel and are emitted to the air when the fuel evaporates or passes through the engine unburned. Other toxics are emitted from the incomplete combustion of fuels or as secondary combustion products. Metal air toxics also result from engine wear or from impurities in oil or gasoline. The USEPA also extracted a subset of this list of 21 compounds that it now labels as the eight priority MSATs. These are 1,3-butadiene, acetaldehyde, acrolein, benzene, diesel particulate matter (diesel PM), formaldehyde, naphthalene, and polycyclic organic matter. While these MSATs are considered the priority transportation toxics, the USEPA stresses that the lists are subject to change and may be adjusted in future rules (FHWA 2016c).

The USEPA has issued a number of regulations that will dramatically decrease MSATs through cleaner fuels and cleaner engines. According to an FHWA analysis, even if the

number of vehicle miles traveled increases by 45 percent from 2010 to 2050 as forecasted, a combined reduction of 91 percent in the total annual emissions for priority MSAT is projected for the same time period (FHWA 2016c). Project MSAT impacts are discussed in Section 5.1 of this report.

## 2.7.2 Diesel Exhaust Particulate

In 1999, the ARB identified particulate emissions from diesel-fueled engines as a TAC. Once a substance is identified as a TAC, the ARB is required by law to determine if there is a need for further control. This is referred to as risk management. The process of further studies is ongoing at the ARB, with committees meeting to analyze both stationary and mobile diesel engine sources, as well as many other aspects of the problem. In October 2000, the ARB approved the *Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles* (ARB 2000a) and the *Risk Management Guidance for the Permitting of New Stationary Diesel-Fueled Engines* (ARB 2000b). ARB programs in progress relating to truck emissions are included in the following paragraphs. There are other programs for risk reduction for off-road diesel engines.

In February 2001, the USEPA issued new rules requiring cleaner diesel fuels in 2006 and beyond. However, since 1993 California's regulations have required cleaner diesel fuel than the federal requirements. The 1993 federal regulations reduced particulate emissions by 5 percent, while the California regulations reduced particulate emissions by 25 percent.

The control of emissions from mobile sources is a statewide responsibility of the ARB that has not been delegated to the local air districts. However, the Imperial County APCD is participating in the administration programs to reduce diesel emissions, principally by procurement and use of replacement vehicles powered by natural gas.

Some air districts have issued preliminary project guidance for projects with large or concentrated numbers of trucks, such as warehouses and distribution facilities. No standards exist for quantitative impact analysis for diesel particulates.

## 2.8 Asbestos

The federal CAA requires the USEPA to develop and enforce regulations to protect the general public from exposure to airborne contaminants that are known to be hazardous to human health. In accordance with CAA Section 112, the USEPA established National Emissions Standards for Hazardous Air Pollutants (NESHAP) to protect the public. Asbestos was one of the first hazardous air pollutants regulated under this section. On March 31, 1971, the USEPA identified asbestos as a hazardous pollutant, and on April 6, 1973, first promulgated the asbestos NESHAP in 40 Code of Federal Regulations (CFR) Part 61. In 1990, a revised NESHAP regulation was promulgated by the USEPA.

The asbestos NESHAP regulations protect the public by minimizing the release of asbestos fibers during activities involving the processing, handling, and disposal of asbestos-containing material. Accordingly, the asbestos NESHAP specifies work practices

to be followed during demolitions and renovations of all structures, installations, and buildings (excluding residential buildings that have four or fewer dwelling units). In addition, the regulations require the project applicant to notify applicable state and local agencies and/or USEPA regional offices before all demolitions or before construction that contains a certain threshold amount of asbestos.

### **2.8.1 Naturally Occurring Asbestos-bearing Serpentine**

Serpentine is a mineral commonly found in seismically active regions of California, usually in association with ultramafic rocks and along associated faults. Certain types of serpentine occur naturally in a fibrous form known generically as asbestos. Asbestos is a known carcinogen and inhalation of asbestos may result in the development of lung cancer or mesothelioma. The ARB has regulated the amount of asbestos in crushed serpentinite used in surfacing applications, such as for gravel on unpaved roads, since 1990. In 1998, new concerns were raised about health hazards from activities that disturb asbestos-bearing rocks and soil. In response, the ARB revised their asbestos limit for crushed serpentines and ultramafic rock in surfacing applications from 5 percent to less than 0.25 percent and adopted a new rule requiring best practices dust control measures for activities that disturb rock and soil containing naturally occurring asbestos (California Department of Conservation [CDC] 2000).

According to the report *A General Location Guide for Ultramafic Rocks in California-Area Likely to Contain Naturally Occurring Asbestos* (CDC 2000), within Imperial County naturally occurring asbestos are not typically found in the geological formations present on the project site (CDC 2000). Thus, hazardous exposure to asbestos-containing serpentine materials would not be a concern with the project.

## **3.0 Applicable Standards**

### **3.1 Federal and State Standards**

The CAA (42 United States Code Sections 7401–7671q) requires the adoption of National Ambient Air Quality Standards (NAAQS) to protect the public health and welfare from the effects of air pollution. The NAAQS have been updated as needed. Current standards are set for SO<sub>2</sub>, CO, NO<sub>2</sub>, O<sub>3</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, and lead. The ARB has established the California Ambient Air Quality Standard (CAAQS) that are generally more restrictive than the NAAQS and include other pollutants than only the federally identified criteria pollutants. Federal and state standards are shown in Table 1 (ARB 2016).

### **3.2 Regional Authority**

In the City, the Imperial County APCD is the agency responsible for the administration of federal and state air quality laws, regulations, and policies. Included in the APCD's tasks are monitoring of air pollution, preparation of the SIP for Imperial County, and promulgation of Rules and Regulations. The SIP includes strategies and tactics to be used

to attain the federal O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> standards. The Rules and Regulations include procedures and requirements to control the emission of pollutants and to prevent adverse air quality impacts. The APCD has also prepared guidelines for determining significance of air quality impacts (APCD 2007). The document is intended to develop and adopt protocol for addressing air quality impacts in the SSAB.

One APCD regulation is applicable to construction of the project; Regulation VIII, which regulates emissions of fugitive dust. Regulation VIII includes the following specific rules:

- Rule 800 – Fugitive Dust Requirements for Control of PM<sub>2.5</sub>
- Rule 801 – Construction and Earthmoving Activities
- Rule 802 – Bulk Materials
- Rule 803 – Carry Out and Track Out
- Rule 804 – Open Areas
- Rule 805 – Paved and Unpaved Roads
- Rule 806 – Conservation Management Practices

The project is required to comply with these rules, and conformance will be incorporated into project specifications and procedures.

### 3.3 Conformity of Federal Actions

Section 176(c) of the federal CAA requires the following:

No department, agency, or instrumentality of the Federal Government shall engage in, support in any way or provide financial assistance for, license or permit, or approve, any activity which does not conform to an implementation plan after it has been approved ...

Conformity to an implementation plan means

- (A) conformity to an implementation plan's purpose of eliminating or reducing the severity and number of violations of the national ambient air quality standards and achieving expeditious attainment of such standards; and
- (B) that such activities will not
  - (i) cause or contribute to any new violation of any standard in any area;
  - (ii) increase the frequency or severity of any existing violation of any standard in any area; or
  - (iii) delay timely attainment of any standard or any required interim emission reductions or other milestones in any area.

The determination of conformity shall be based on the most recent estimates of emissions, and such estimates shall be determined from the most recent population, employment, travel and congestion estimates as determined by the metropolitan planning organization or other agency authorized to make such estimates.

Table 1 Ambient Air Quality Standards						
Pollutant	Averaging Time	California Standards <sup>1</sup>		National Standards <sup>2</sup>		
		Concentration <sup>3</sup>	Method <sup>4</sup>	Primary <sup>3,5</sup>	Secondary <sup>3,6</sup>	Method <sup>7</sup>
Ozone <sup>8</sup>	1 Hour	0.09 ppm (180 µg/m <sup>3</sup> )	Ultraviolet Photometry	–	Same as Primary Standard	Ultraviolet Photometry
	8 Hour	0.07 ppm (137 µg/m <sup>3</sup> )		0.070 ppm (137 µg/m <sup>3</sup> )		
Respirable Particulate Matter (PM <sub>10</sub> ) <sup>9</sup>	24 Hour	50 µg/m <sup>3</sup>	Gravimetric or Beta Attenuation	150 µg/m <sup>3</sup>	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m <sup>3</sup>		–		
Fine Particulate Matter (PM <sub>2.5</sub> ) <sup>9</sup>	24 Hour	No Separate State Standard		35 µg/m <sup>3</sup>	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m <sup>3</sup>	Gravimetric or Beta Attenuation	12 µg/m <sup>3</sup>		
Carbon Monoxide (CO)	1 Hour	20 ppm (23 mg/m <sup>3</sup> )	Non-dispersive Infrared Photometry	35 ppm (40 mg/m <sup>3</sup> )	–	Non- dispersive Infrared Photometry
	8 Hour	9.0 ppm (10 mg/m <sup>3</sup> )		9 ppm (10 mg/m <sup>3</sup> )	–	
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m <sup>3</sup> )		–	–	
Nitrogen Dioxide (NO <sub>2</sub> ) <sup>10</sup>	1 Hour	0.18 ppm (339 µg/m <sup>3</sup> )	Gas Phase Chemi- luminescence	100 ppb (188 µg/m <sup>3</sup> )	–	Gas Phase Chemi- luminescence
	Annual Arithmetic Mean	0.030 ppm (57 µg/m <sup>3</sup> )		0.053 ppm (100 µg/m <sup>3</sup> )	Same as Primary Standard	
Sulfur Dioxide (SO <sub>2</sub> ) <sup>11</sup>	1 Hour	0.25 ppm (655 µg/m <sup>3</sup> )	Ultraviolet Fluorescence	75 ppb (196 µg/m <sup>3</sup> )	–	Ultraviolet Fluorescence; Spectro- photometry (Pararosani- line Method)
	3 Hour	–		–	0.5 ppm (1,300 µg/m <sup>3</sup> )	
	24 Hour	0.04 ppm (105 µg/m <sup>3</sup> )		0.14 ppm (for certain areas) <sup>11</sup>	–	
	Annual Arithmetic Mean	–		0.030 ppm (for certain areas) <sup>11</sup>	–	
Lead (Pb) <sup>12,13</sup>	30 Day Average	1.5 µg/m <sup>3</sup>	Atomic Absorption	–	–	High Volume Sampler and Atomic Absorption
	Calendar Quarter	–		1.5 µg/m <sup>3</sup> (for certain areas) <sup>12</sup>	Same as Primary Standard	
	Rolling 3-Month Average	–		0.15 µg/m <sup>3</sup>		
Visibility Reducing Particles <sup>14</sup>	8 Hour	See footnote 14	Beta Attenuation and Transmittance through Filter Tape	No National Standards		
Sulfates	24 Hour	25 µg/m <sup>3</sup>	Ion Chroma- tography			
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m <sup>3</sup> )	Ultraviolet Fluorescence			
Vinyl Chloride <sup>12</sup>	24 Hour	0.01 ppm (26 µg/m <sup>3</sup> )	Gas Chroma- tography			

**Table 1  
Ambient Air Quality Standards**

NOTES:

ppm = parts per million; ppb = parts per billion;  $\mu\text{g}/\text{m}^3$  = micrograms per cubic meter; – = not applicable.

- <sup>1</sup> California standards for ozone ( $\text{O}_3$ ), CO (except 8-hour Lake Tahoe),  $\text{SO}_2$  (1- and 24-hour),  $\text{NO}_2$ , particulate matter ( $\text{PM}_{10}$ ,  $\text{PM}_{2.5}$ , and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.
- <sup>2</sup> National standards (other than  $\text{O}_3$ , particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The  $\text{O}_3$  standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For  $\text{PM}_{10}$ , the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above  $150 \mu\text{g}/\text{m}^3$  is equal to or less than one. For  $\text{PM}_{2.5}$ , the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact the USEPA for further clarification and current national policies.
- <sup>3</sup> Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25 degrees Celsius ( $^{\circ}\text{C}$ ) and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of  $25^{\circ}\text{C}$  and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.
- <sup>4</sup> Any equivalent measurement method which can be shown to the satisfaction of the California Air Resources Board (ARB) to give equivalent results at or near the level of the air quality standard may be used.
- <sup>5</sup> National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.
- <sup>6</sup> National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.
- <sup>7</sup> Reference method as described by the USEPA. An “equivalent method” of measurement may be used but must have a “consistent relationship to the reference method” and must be approved by the USEPA.
- <sup>8</sup> On October 1, 2015, the national 8-hour  $\text{O}_3$  primary and secondary standards were lowered from 0.075 to 0.070 ppm.
- <sup>9</sup> On December 14, 2012, the national annual  $\text{PM}_{2.5}$  primary standard was lowered from  $15 \mu\text{g}/\text{m}^3$  to  $12.0 \mu\text{g}/\text{m}^3$ . The existing national 24-hour  $\text{PM}_{2.5}$  standards (primary and secondary) were retained at  $35 \mu\text{g}/\text{m}^3$ , as was the annual secondary standards of  $15 \mu\text{g}/\text{m}^3$ . The existing 24-hour  $\text{PM}_{10}$  standards (primary and secondary) of  $150 \mu\text{g}/\text{m}^3$  also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.
- <sup>10</sup> To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national standards are in units of ppb. California standards are in units of parts per million (ppm). To directly compare the national standards to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.
- <sup>11</sup> On June 2, 2010, a new 1-hour  $\text{SO}_2$  standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971  $\text{SO}_2$  national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved. Note that the 1-hour national standard is in units of parts per billion (ppb). California standards are in units of ppm. To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.
- <sup>12</sup> The ARB has identified lead and vinyl chloride as TACs with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.
- <sup>13</sup> The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard ( $1.5 \mu\text{g}/\text{m}^3$  as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.
- <sup>14</sup> In 1989, the ARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are “extinction of 0.23 per kilometer” and “extinction of 0.07 per kilometer” for the statewide and Lake Tahoe Air Basin standards, respectively.

SOURCE: ARB 2016.

In November 1993, the FHWA and USEPA developed guidance for determining conformity of transportation plans, programs, and projects. This guidance is denoted as the Transportation Conformity Rule (40 CFR Section 51.390 and 40 CFR Sections 93.100–129).

The CAA requires a demonstration that federal actions conform to the SIP and similar approved plans in areas that are designated as non-attainment or have maintenance plans for criteria pollutants. Transportation measures, such as the project, are analyzed for conformity with the SIP as part of the Regional Transportation Plan (RTP) and Regional Transportation Improvement Program (RTIP). If the design concept and scope of a proposed transportation project are consistent with the project description in the applicable RTP and RTIP, and the assumptions in the regional emissions analysis for the RTP and RTIP, then the project would conform to the SIP, and no adverse regional air quality impact would occur as a result of the project. As discussed, the currently applicable RTP and RTIP for the project area are the 2016 RTP/Sustainable Communities Strategies (SCS; Southern California Association of Governments [SCAG] 2016a) and the 2017 FTIP (SCAG 2016b). Both plans were prepared by SCAG. The FHWA made a finding of conformity for the 2017 FTIP and a conformity redetermination for the 2016 RTP/SCS on December 16, 2016 (FHWA 2016a and 2016b).

The project is included in the 2016 RTP/SCS (RTP ID 1161L001) and in the 2017 FTIP Amendment 17-03 (FTIP ID IMP160901, Program CAX66). The project was originally described in the 2016 RTP/SCS as a “new roadway from I-8 to McCabe Road. Phase 1 includes 6 new lanes on Imperial Avenue from I-8 to Wake Avenue; and 2 new lanes on Wake Avenue from Imperial Avenue to Cypress Drive” (see Attachment 1). The 2016 RTP/SCS Amendment 1 removed the discussion of Phase 1 from the project description and only described the project as a “new roadway from I-8 to McCabe Road” (see Attachment 1).

The project has subsequently been down-scoped to four new lanes on Imperial Avenue from I-8 to Wake Avenue. Although the project is inconsistent with the description in the 2016 RTP/SCS, the project is conforming because it would build fewer lanes than originally anticipated, would not exceed the emissions budget for the project, and is consistent with the 2017 FTIP (see below). Additionally, it is anticipated that 2016 RTP/SCS Amendment 3 will receive Federal approval in December 2018, which will include a revised description of Phase 1 of the project as 4 new lanes on Imperial Avenue from I-8 to Wake Avenue, consistent with the 2017 FTIP.

The project has the following description in the 2017 FTIP: Imperial Avenue Extension South – New roadway from I-8 to McCabe Road. Phase 1 includes four new lanes on Imperial Avenue from I-8 to Wake Avenue; and two new lanes on Wake Avenue from Imperial Avenue to Cypress Drive (see Attachment 1). The complete descriptions as listed in the 2016 RTP/SCS and the 2017 FTIP are included in Attachment 1. On April 6, 2017, SCAG adopted the 2016 RTP/SCS Amendment 1 and the 2017 FTIP Amendment 17-03 via Resolution No. 17-588-2, and the conformity analysis indicated that all air quality conformity requirements have been met. The FHWA also made a finding of conformity on the 2016 RTP/SCS Amendment 1 and the 2017 FTIP Amendment 17-03 on May 12, 2017, included as Attachment 2.

## 4.0 Existing Conditions

### 4.1 Environmental Setting, Climate, and Meteorology

The project is located in the city of El Centro in Imperial County. Imperial County is a desert community with a warm, dry climate. Summers are extremely hot and dry, while winters are temperate. The mean monthly temperature in El Centro ranges from 55 to 92 degrees Fahrenheit (°F), the average annual temperature is 72.7 °F, and the mean maximum and minimum temperatures are 88.8 °F and 56.7 °F, respectively (Western Regional Climate Center [WRCC] 2017).

One of the main determinants of the climatology is a semi-permanent high-pressure area (the Pacific High) in the eastern Pacific Ocean. In the summer, the Pacific High is located well to the north, directing storm tracks north of California. The Pacific High maintains clear skies in the region for much of the year. When the Pacific High moves southward during the winter, this pattern changes, and low-pressure storms are brought into the region, causing occasional precipitation. In El Centro, precipitation averages less than three inches annually (WRCC 2017).

### 4.2 Regional and Local Air Quality

Specific geographic areas are classified as either “attainment” or “non-attainment” areas for each pollutant based on the comparison of measured data with federal and state standards. If an area is redesignated from non-attainment to attainment, the CAA requires a revision to the SIP, called a maintenance plan, to demonstrate how the air quality standard will be maintained for at least 10 years. The Transportation Conformity Rule, 51 CFR 390-464, classifies an area required to develop a maintenance plan as a maintenance area.

Imperial County currently meets the federal standards for all criteria pollutants except O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. Imperial County was designated as a moderate non-attainment area for the 1997 8-hour O<sub>3</sub> standard. As such, Imperial County was required to prepare the *Final 2009 1997 8-Hour Ozone Modified Air Quality Management Plan* (2009 Ozone AQMP) (APCD 2010a). The 2009 Modified AQMP was adopted by the APCD in July 2010 along with the *2009 Reasonably Available Control Technology State Implementation Plan* (APCD 2010b). In March 2008, the USEPA revised the 8-hour O<sub>3</sub> standard to 0.075 ppm, and the 1997 8-hour O<sub>3</sub> standard was revoked effective April 6, 2015. Imperial County is classified as a moderate non-attainment area for the 2008 8-hour O<sub>3</sub> standard. Therefore, as required, the *Draft Imperial County 2017 State Implementation Plan for the 2008 8-Hour Ozone Standard* (2017 Ozone SIP) was prepared (ACPD 2017). The Draft 2017 Ozone SIP was released to the public, and Imperial County is currently conducting public hearings to consider adoption. Additionally, Imperial County has prepared the *Final 2009 Imperial County State Implementation Plan for Particulate Matter Less Than 10 Microns in Aerodynamic Diameter* (APCD 2009) and the *Final Imperial County 2013 State*

Implementation Plan for the 2006 24-Hour PM<sub>2.5</sub> Moderate Nonattainment Area (APCD 2014) demonstrating how the region will attain the federal PM<sub>10</sub> and PM<sub>2.5</sub> standards.

Imperial County meets the California standards for all criteria pollutants, except ozone, PM<sub>10</sub>, and PM<sub>2.5</sub>. Therefore, Imperial County has been designated as a state non-attainment area for ozone and PM<sub>10</sub>. The state has not yet issued a non-attainment status for PM<sub>2.5</sub>.

Ambient air pollutant concentrations in Imperial County are measured at seven air quality monitoring stations operated by the Imperial County APCD. The APCD air quality monitoring station that represents the project area, climate, and topography in the SSAB is the El Centro monitoring station, located on 9th Street in El Centro, approximately 1.5 miles northeast of the project area. The station monitors O<sub>3</sub>, NO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. Table 2 provides a summary of measurements collected at the El Centro monitoring station for the years 2012 through 2016.

<b>Table 2</b>					
<b>Summary of Air Quality Measurements Recorded at the El Centro Monitoring Station</b>					
Pollutant/Standard	2012	2013	2014	2015	2016
<b>Ozone</b>					
Days State 1-hour Standard Exceeded (0.09 ppm)	9	7	2	2	4
Days State 8-hour Standard Exceeded (0.07 ppm)	26	23	12	11	11
Days Federal 2015 8-hour Standard Exceeded (0.070 ppm)	26	23	12	11	11
Days Federal 2008 8-hour Standard Exceeded (0.075 ppm)	14	11	5	6	2
Maximum 1-hour (ppm)	0.111	0.110	0.101	0.099	0.108
Maximum 8-hour (ppm)	0.091	0.088	0.080	0.079	0.082
<b>Nitrogen Dioxide</b>					
Days State 1-hour Standard Exceeded (0.18 ppm)	0	0	0	0	0
Days Federal 1-hour Standard Exceeded (0.100 ppm)	0	0	0	0	0
Maximum 1-hour (ppm)	0.072	0.053	0.059	0.059	0.050
Annual Average (ppm)	0.008	0.007	0.007	0.007	0.005
<b>PM<sub>10</sub>*</b>					
Measured Days State 24-hour Standard Exceeded (50 µg/m <sup>3</sup> )	6	10	15	7	--
Calculated Days State 24-hour Standard Exceeded (50 µg/m <sup>3</sup> )	35.9	--	90.0	44.1	--
Measured Days Federal 24-hour Standard Exceeded (150 µg/m <sup>3</sup> )	0	0	0	1	9
Calculated Days Federal 24-hour Standard Exceeded (150 µg/m <sup>3</sup> )	0.0	0.0	0.0	6.1	9.0
Maximum Daily (µg/m <sup>3</sup> )	75.6	147.9	120.4	165.9	207.5
State Annual Average (µg/m <sup>3</sup> )	33.5	--	40.8	35.6	--
Federal Annual Average (µg/m <sup>3</sup> )	33.4	33.7	40.8	35.6	44.3
<b>PM<sub>2.5</sub>*</b>					
Measured Days Federal 24-hour Standard Exceeded (35 µg/m <sup>3</sup> )	0	0	0	0	0
Calculated Days Federal 24-hour Standard Exceeded (35 µg/m <sup>3</sup> )	0.0	0.0	0.0	0.0	0.0
Maximum Daily (µg/m <sup>3</sup> )	26.4	30.0	27.5	31.2	31.3
State Annual Average (µg/m <sup>3</sup> )	--	7.0	6.6	6.3	9.5
Federal Annual Average (µg/m <sup>3</sup> )	7.5	7.0	6.5	6.2	9.4
SOURCE: ARB 2017					
PM <sub>10</sub> = particulate matter less than 10 microns; PM <sub>2.5</sub> = particulate matter less than 2.5 microns; ppm = parts per million; µg/m <sup>3</sup> = micrograms per cubic meter; -- = Not available.					
* Calculated days value. Calculated days are the estimated number of days that a measurement would have been greater than the level of the standard had measurements been collected every day. The number of days above the standard is not necessarily the number of violations of the standard for the year.					

## 4.3 Roadway Network

The following is a description of the existing roadway network in the vicinity of the project:

- **I-8** is a 4-lane, east/west freeway in the vicinity of the project.
- **Imperial Avenue** is classified as a 6-lane arterial north of I-8 and a 4-lane arterial south of I-8 in the City's Circulation Element. Currently, Imperial Avenue is not built south of I-8, and is built as a 4-lane divided roadway north of I-8.
- **La Brucherie Road** is classified as a 4-lane arterial in the City's Circulation Element, and is currently built as a 2-lane road south of I-8.
- **8th Street/Clark Road** is classified as a 6-lane arterial north of Danenberg Drive and a 4-lane arterial between Danenberg Drive and McCabe Road. Currently, 8th Street/Clark Road is built as a 4-lane road north of Centinela Drive, a 2-lane road between Centinela Drive and Wake Avenue, and a 4-lane road between Wake Avenue and Palmview Drive.
- **Wake Avenue** is classified as a 2-lane arterial in the City's Circulation Element. Currently, it is built partially as a 2-lane road; however, between 8th Street and SR-86, it is built as a 4-lane road with a center two-way left-turn lane.
- **Danenberg Drive** is classified as a 2-lane arterial east of Imperial Avenue and a 4-lane arterial west of Imperial Avenue in the City's Circulation Element. Currently, only a few portions of Danenberg Drive are constructed.
- **Manuel Ortiz Avenue** is an unclassified 2-lane residential street within the City, and is currently built as a 2-lane road.
- **Valleyview Avenue** is an unclassified 2-lane residential street within the City, and is currently built as a 2-lane road.
- **McCabe Road** is classified as a 6-lane arterial in the City's Circulation Element, and is currently built as a 4-lane road.

## 5.0 Future Air Quality and Impacts

### 5.1 Long-term Emissions

#### 5.1.1 Regional Air Quality

The CAA requires a demonstration that federal actions conform to the SIP and similar approved plans in areas that are designated as non-attainment or have maintenance plans for criteria pollutants. Transportation measures, such as the project, are analyzed for conformity with the SIP as part of the RTP and RTIP. If the design concept and scope of a

proposed transportation project are consistent with the project description in the applicable RTP and RTIP, and the assumptions in the regional emissions analysis for the RTP and RTIP, then the project would conform to the SIP, and no adverse regional air quality impact would occur as a result of the project.

SCAG, as the area's metropolitan planning organization (MPO), and the FHWA must make a determination that the applicable RTP and RTIP conform to the applicable SIP. Conformity to the SIP means that transportation activities will not create new air quality violations, worsen existing violations, or delay the attainment of the NAAQS. Federal regulations also require SCAG to conduct an air quality conformity analysis of all regionally significant projects that increase the transportation system capacity. All regionally significant capacity-increasing transportation projects, regardless of funding sources, must be included in the RTIP.

As discussed, the currently applicable RTP and RTIP for the project area are the 2016 RTP/SCS (SCAG 2016a) and the 2017 FTIP (SCAG 2016b). Both plans were prepared by SCAG. The FHWA made a finding of conformity for the 2017 FTIP and a conformity redetermination for the 2016 RTP/SCS on December 16, 2016 (FHWA 2016a and 2016b).

The project is included in the 2016 RTP/SCS (RTP ID 1161L001) and in the 2017 FTIP Amendment 17-03 (FTIP ID IMP160901, Program CAX66). The project was originally described in the 2016 RTP/SCS as a "new roadway from I-8 to McCabe Road. Phase 1 includes 6 new lanes on Imperial Avenue from I-8 to Wake Avenue; and 2 new lanes on Wake Avenue from Imperial Avenue to Cypress Drive" (see Attachment 1). The 2016 RTP/SCS Amendment 1 removed the discussion of Phase 1 from the project description and only described the project as a "new roadway from I-8 to McCabe Road" (see Attachment 1).

The project has subsequently been down-scoped to 4 new lanes on Imperial Avenue from I-8 to Wake Avenue. Although the project is inconsistent with the description in the 2016 RTP/SCS, the project is conforming because it would build fewer lanes than originally anticipated, would not exceed the emissions budget for the project, and is consistent with the 2017 FTIP (see below). Additionally, it is anticipated that 2016 RTP/SCS Amendment 3 will receive Federal approval in December 2018, which will include a revised description of Phase 1 of the project as 4 new lanes on Imperial Avenue from I-8 to Wake Avenue, consistent with the 2017 FTIP.

The project has the following description in the 2017 FTIP: Imperial Avenue Extension South – New roadway from I-8 to McCabe Road. Phase 1 includes four new lanes on Imperial Avenue from I-8 to Wake Avenue; and two new lanes on Wake Avenue from Imperial Avenue to Cypress Drive (Attachment 1). The complete descriptions as listed in the 2016 RTP/SCS and the 2017 FTIP are included in Attachment 1. On April 6, 2017, SCAG adopted the 2016 RTP/SCS Amendment 1 and the 2017 FTIP Amendment 17-03 via Resolution No. 17-588-2, and the conformity analysis indicated that all air quality conformity requirements have been met. The FHWA also made a finding of conformity on the 2016 RTP/SCS Amendment 1 and the 2017 FTIP Amendment 17-03 on May 12, 2017, included as Attachment 2.

The design concept and scope of the project are within the scope of the project description that will be included in the 2016 RTP/SCS Amendment 3 anticipated to receive Federal approval in December 2018, as well as the project description in the and 2017 FTIP, and the assumptions in the SCAG regional emissions analysis. Therefore, the project is assumed to conform to the SIP and no adverse regional or local air quality impact would occur as a result of the project. Furthermore, implementation of the project would ensure that the City would be consistent with the 2016 SCAG RTP/SCS and 2017 FTIP.

## **5.1.2 Local Air Quality (“Hot Spots”)**

### **5.1.2.1 Carbon Monoxide**

The Transportation Conformity Rule requires a statement that:

...federal projects must not cause or contribute to any new localized CO violations or increase the frequency or severity of any existing CO violations in CO nonattainment and maintenance areas.

The CO portion of the Transportation Conformity Rule does not apply to the project because Imperial County is a federal CO attainment area.

### **5.1.2.2 Particulate Matter**

On March 10, 2006, the USEPA published a final rule that establishes the transportation conformity criteria and procedures for determining which transportation projects must be analyzed for local air quality impacts in PM<sub>2.5</sub> and PM<sub>10</sub> non-attainment and maintenance areas. Based on that rule, the USEPA and FHWA published *Transportation Conformity Guidance for Quantitative Hot-spot Analyses in PM<sub>2.5</sub> and PM<sub>10</sub> Nonattainment and Maintenance Areas* (PM Guidance; FHWA 2015). As discussed, Imperial County is designated as a non-attainment area for both the PM<sub>10</sub> and PM<sub>2.5</sub> standards.

A hot spot analysis is defined in 40 CFR 93.101 as an estimation of likely future localized PM<sub>2.5</sub> or PM<sub>10</sub> pollutant concentrations and a comparison of those concentrations to the relevant air quality standards. A hot spot analysis assesses the air quality impacts on a scale smaller than an entire non-attainment or maintenance area, including, for example, congested roadway intersections and highways or transit terminals. Such an analysis is a means of demonstrating that a transportation project meets CAA conformity requirements to support state and local air quality goals with respect to potential localized air quality impacts. When a hot spot analysis is required, it is included within the project-level conformity determination that is made by the FHWA or Federal Transportation Administration.

The PM Guidance describes how to complete a quantitative hot spot analyses for certain highway and transit projects, and provides technical guidance on estimating project emissions.

### a. Projects of Air Quality Concern

The PM<sub>2.5</sub> and PM<sub>10</sub> hot spot analysis method in the November 2015 Guidance involves two steps: determining whether or not a project is a "project of air quality concern" and, if it is a "project of air quality concern", preparation of a more detailed quantitative analysis of the project.

The November 2015 PM Guidance defines the following types of projects as projects of air quality concern (FHWA 2015):

- New highway project that have a significant number of diesel vehicles, and expanded highway projects that have a significant increase in the number of diesel vehicles;
- Projects affecting intersections that are Level of Service (LOS) D, E, or F with a significant number of diesel vehicles, or those that will change to LOS D, E, or F, because of increased traffic volumes from a significant number of diesel vehicles related to the project;
- New bus and rail terminals, and transfer points, that have a significant number of diesel vehicles congregating at a single location;
- Expanded bus and rail terminals, and transfer points, that significantly increase the number of diesel vehicles congregating at a single location; and,
- Projects in, or affecting locations, areas, or categories of sites that are identified in the PM<sub>2.5</sub> or PM<sub>10</sub> applicable implementation plan or implementation plan submission, as appropriate, as sites of violation or possible violation.

A significant volume for a new highway or expressway is defined as an annual average daily traffic (AADT) volume of 125,000 or more, and a significant number of diesel vehicles is defined as 8 percent or more of that total AADT or more than 10,000 truck AADT. A significant increase in diesel truck traffic is normally considered to be approximately 10 percent.

The proposed extension of Imperial Avenue would improve traffic operations on the roadway network in the vicinity of the project. The extension would be a 4-lane arterial and 2-lane arterial with General Plan capacities of 36,000 ADT and 18,000 ADT, respectively (City of El Centro 2004), and long-term (year 2040) projected traffic volumes ranging from 8,200 to 24,000 ADT (Linscott, Law & Greenspan [LLG] 2018). Additionally, the project would not result in an increase in the number of diesel vehicles utilizing the project area. According to the traffic engineer for the project, Imperial Avenue would carry 6.3 percent trucks (LLG 2018). This is the current truck volume for SR-86 at I-8, and is appropriate for evaluation of the project as it is a cross-street of I-8 and runs parallel to the future extension of Imperial Avenue. While the project would create a new roadway segment, the estimated maximum ADT would be substantially less than the volume significance criteria of 125,000 AADT. Additionally, the project is not a trip generator. Implementation of the

project would resolve the existing traffic network deficiencies within the City of El Centro and provide improved access to residences and other properties south of I-8. Travelers would no longer need to travel the additional distance required under the existing condition and would have improved direct access south of I-8. Additionally, the proposed roadway improvements would not reduce levels of service below what would occur under the Near-Term Without Project scenario.

The project would not be a project of air quality concern for PM<sub>10</sub> or PM<sub>2.5</sub> emissions because the project would not result in increases in the number of diesel vehicles utilizing the project area; does not involve intersections that are operating at LOS D, E, or F with a significant number of diesel vehicles; does not involve a new or expanded bus or rail terminal; and would not affect a location or category of site which are identified in the PM<sub>10</sub> implementation plan as sites of violation or possible violation. The project was discussed among stakeholders at a Transportation Conformity Working Group (TCWG) meeting on March 27, 2018, pursuant to the interagency consultation requirement of 40 CFR 93.105(c)(1)(i). The members of the TCWG confirmed that the project would not be considered a project of air quality concern. The TCWG determination is included as Attachment 3. While the entire County of Imperial is classified as a non-attainment area for the NAAQS for PM<sub>10</sub>, the APCD has identified windblown fugitive dust from open areas, agricultural fields, and unpaved roads as the main sources of the exceedances of the PM<sub>10</sub> standards; thus violations are not attributable to traffic and paved roads in developed areas would not affect a location or category of site that would contribute to violations of the PM<sub>10</sub> standard. PM<sub>2.5</sub> exceedances of the CAAQS are identified in the Calexico area only. As shown in Table 2, no PM<sub>2.5</sub> exceedances have occurred during the most recent monitoring period of 2012 through 2016.

### **5.1.2.3 Mobile Source Air Toxics**

The following discussion is based on the FHWA Memorandum “Information: Updated Interim Guidance on Mobile Source Air Toxic Analysis in National Environmental Policy Act (NEPA) Documents,” dated October 18, 2016 (FHWA 2016c). The purpose of the guidance is to advise when and how to analyze MSAT in the NEPA process for highways. This guidance is provisional because MSAT science is still evolving. As the science progresses, FHWA will update the guidance.

#### **a. Summary of Existing Credible Scientific Evidence Relevant to Evaluating the Impacts of MSATs**

Research into the health impacts of MSATs is ongoing. For different emission types, there are a variety of studies that show that some either are statistically associated with adverse health outcomes through epidemiological studies (frequently based on emissions levels found in occupational settings) or that animals demonstrate adverse health outcomes when exposed to large doses.

Exposure to toxics has been a focus of a number of USEPA efforts. Most notably, the agency conducted the National Air Toxics Assessment 1996 to evaluate modeled estimates of

human exposure applicable to the county level. While not intended for use as a measure of or benchmark for local exposure, the modeled estimates in the National Air Toxics Assessment database best illustrate the levels of various toxics when aggregated to a national or State level.

The USEPA is in the process of assessing the risks of various kinds of exposures to these pollutants. The USEPA Integrated Risk Information System (IRIS) is a database of human health effects that may result from exposure to various substances found in the environment. The IRIS database is located at <http://www.epa.gov/iris>.

The following toxicity information for the nine prioritized MSATs was taken from the IRIS database *Weight of Evidence Characterization* summaries. This information is taken verbatim from USEPA's IRIS database and represents the Agency's most current evaluations of the potential hazards and toxicology of these chemicals or mixtures.

- **1,3-butadiene** is characterized as carcinogenic to humans by inhalation.
- **Acetaldehyde** is a probable human carcinogen based on increased incidence of nasal tumors in male and female rats and laryngeal tumors in male and female hamsters after inhalation exposure.
- The potential carcinogenicity of **acrolein** cannot be determined because the existing data are inadequate for an assessment of human carcinogenic potential for either the oral or inhalation route of exposure.
- **Benzene** is characterized as a known human carcinogen.
- **Diesel exhaust** is likely to be carcinogenic to humans by inhalation from environmental exposures. Diesel exhaust as reviewed in this document is the combination of diesel particulate matter and diesel exhaust organic gases. Diesel exhaust also represents chronic respiratory effects, possibly the primary non-cancer hazard from MSATs. Prolonged exposures may impair pulmonary function and could produce symptoms, such as cough, phlegm, and chronic bronchitis. Exposure relationships have not been developed from these studies.
- **Formaldehyde** is a probable human carcinogen, based on limited evidence in humans, and sufficient evidence in animals.
- **Naphthalene** is a possible human carcinogen, based on the inadequate data of carcinogenicity in humans exposed to naphthalene via the oral and inhalation routes, and the limited evidence of carcinogenicity in animals via the inhalation route.
- **Polycyclic organic matter** is a probable human carcinogen based on sufficient evidence in animals.

There have been other studies that address MSAT health impacts in proximity to roadways. The Health Effects Institute, a non-profit organization funded by USEPA,

FHWA, and industry, has undertaken a major series of studies to research near-roadway MSAT hot spots, the health implications of the entire mix of mobile source pollutants, and other topics.

The following recent studies have reported that proximity to roadways is related to adverse health outcomes, particularly respiratory problems: *Multiple Air Toxic Exposure Study-II*, South Coast Air Quality Management District (2000); *Highway Health Hazards*, Sierra Club (2004), which summarizes 24 studies on the relationship between health and air quality; and NEPA's *Uncertainty in the Federal Legal Scheme Controlling Air Pollution from Motor Vehicles*, Environmental Law Institute, 35 ELR 10273 (2005) with health studies cited therein. Much of this research is not specific to MSATs and instead surveys the full spectrum of both criteria and other pollutants.

It is possible to qualitatively assess the levels of future MSAT emissions under the project. A qualitative analysis cannot identify and measure health impacts from MSATs, but it can give a basis for identifying and comparing the potential differences among MSAT emissions, if any, between the project and no project conditions. The qualitative assessment presented below is derived in part from a study conducted by the FHWA entitled *A Methodology for Evaluating Mobile Source Air Toxic Emissions Among Transportation Project Alternatives*.

## **b. Evaluation of Project MSAT Potential**

The FHWA has developed a tiered approach for analyzing MSATs in NEPA documents. Depending on the specific project circumstances, the FHWA has identified three levels of analysis:

- No analysis for projects with no potential for meaningful MSAT effects, Category (1);
- Qualitative analysis for projects with low potential MSAT effects, Category (2); or
- Quantitative analysis to differentiate alternatives for projects with higher potential MSAT effects, Category (3).

Category (1) is limited to projects that qualify as a categorical exclusion under 23 CFR 771.117(c); are exempt under the Clean Air Act conformity rule under 40 CFR 93.126; or have no meaningful impacts on traffic volumes or vehicle mix.

The project does not meet any of the Category (1) requirements.

For a project to be of the magnitude to have a higher potential for MSAT effects, Category (3), a project must create or significantly alter a major intermodal freight facility that has the potential to concentrate high levels of diesel particulate matter in a single location; or create new or add significant capacity to urban highways such as interstates, urban arterials, or urban collector-distributor routes with traffic volumes where the AADT is projected to be in the range of 140,000 to 150,000, or greater, by the design year; and be proposed to be located in proximity to populated areas or in rural areas, in proximity to concentrations of vulnerable populations (i.e., schools, nursing homes, hospitals). For these

projects, the November 2015 PM Guidance describes how to complete a quantitative hot spot analyses using the USEPA's MOVES2014a model or, for projects in California, the California Air Resources Board's Emission Factors (EMFAC) model.

The project would extend Imperial Avenue from I-8 to McCabe Road as a new four-lane facility from I-8 to Wake Avenue and a two-lane facility from Wake Avenue to McCabe Road. The extension would be a 4-lane arterial and 2-lane arterial with General Plan capacities of 36,000 ADT and 18,000 ADT, respectively (City of El Centro 2004), and long-term (year 2040) projected traffic volumes ranging from 8,200 to 24,000 ADT (LLG 2018). While the project would create a new roadway segment, the estimated maximum ADT would be substantially less than the threshold value of 140,000 AADT, the minimum volume for higher potential MSAT effects (FHWA 2016c). Therefore, the project would not be included in Category (3).

Therefore, by default, the project would be included in Category (2) and would have a low potential for MSAT effects. This assessment is based on FHWA guidance that projects that do not meet the criteria for Category (1) or Category (3) should be included in Category (2).

The primary objective of the project is to resolve existing traffic network deficiencies within the City. Currently, motorists heading south and east from Imperial Avenue must travel along I-8 and exit one mile away at 4th Street (SR-86), which exacerbates the existing congested traffic condition at the 4th Street (SR-86)/I-8 interchange. Motorists heading west from Imperial Avenue must travel along I-8 and exit three miles away at Forrester Road. The project would provide a variety of transportation benefits. The extension of Imperial Avenue to McCabe Road would reduce congestion on 4th Street (SR-86), which is one of the most heavily traveled transportation corridors in the City. This extension would also provide a direct transportation link to new developments occurring in the immediate area.

The amount of MSATs emitted would be proportional to the vehicle miles traveled (VMT), assuming that other variables such as fleet mix are the same with or without the project. Because the project would construct a new portion of Imperial Avenue, the project would result in MSAT emissions along the Imperial Avenue extension that currently don't exist. However, there would be a corresponding reduction in MSAT emissions along the roadway network in the vicinity of the project because vehicle trips would be rerouted to the Imperial Avenue extension. Additionally, there would be a reduction in MSAT emissions because the project would provide a direct transportation link to new developments in the vicinity of the project, resulting in reduced VMT when compared to the no project condition. Further, the project would reduce the congestion on the area transportation network, particularly 4th Street (SR-86), thereby increasing the speed of traffic flow. MSAT emission rates decrease with increased speeds.

With or without the project, emissions will likely be lower than present levels in the design year as a result of USEPA's national control programs that are projected to reduce MSAT emissions. According to an FHWA analysis using USEPA's MOVES2014a model, even if vehicle activity (VMT) increases by 45 percent from 2010 to 2050 as forecast, a combined reduction of 91 percent in the total annual emission rate for the priority MSATs is projected

for the same time period (FHWA 2016c). Local conditions may differ from these national projections in terms of fleet mix and turnover, VMT growth rates, and local control measures. However, the magnitude of the USEPA-projected reductions is so great (even after accounting for VMT growth) that MSAT emissions in the study area are likely to be lower in the future in nearly all cases.

Therefore, there would be no local or regional air quality impacts to sensitive receptors from the project.

## 5.2 Construction Impacts

### 5.2.1 Regional Emissions

The principal criteria pollutants emitted during construction would be PM<sub>10</sub> and PM<sub>2.5</sub>. The source of the pollutants would be fugitive<sup>1</sup> dust created during clearing, grubbing, excavation, and grading; demolition of structures and pavement; vehicle travel on paved and unpaved roads; and material blown from unprotected graded areas, stockpiles, and haul trucks. Generally, the distance that particles drift from their source depends on their size, emission height, and wind speed.

The potential settling distance of dust particles is governed by the initial injection height of the particle, the terminal settling velocity of the particle, and the degree of atmospheric turbulence. For a typical mean wind speed of 10 miles per hour, particles larger than PM 100 micrometers in diameter or smaller are likely to settle out within 20 to 30 feet from the edge of the point of emission (USEPA 2009). Smaller particles (PM 30 micrometers in diameter or smaller] to PM<sub>100</sub>) are likely to settle, depending upon the extent of atmospheric turbulence, within a few hundred feet from the point of emission. Finer particles, particularly PM<sub>10</sub>, and PM<sub>2.5</sub>, settle much slower due to atmospheric turbulence and can travel hundreds of miles (USEPA 2009).

A secondary source of pollutants during construction would be the engine exhaust from construction equipment during all construction activities. The principal pollutants of concern would be NO<sub>x</sub> and volatile organic compounds (VOC) emissions that would contribute to the formation of O<sub>3</sub>, which is a regional non-attainment pollutant.

Federal conformity regulations require analysis of construction impacts for projects when construction activities will last for more than 5 years. Project construction would begin in 2018, and construction of each of the four phases would last one year. Therefore, no quantitative estimate of regional construction emissions is required. However, for informational purposes, construction emissions were quantified (see Section 5.2.1[b]). It is recommended that specific measures to control dust and particulates be incorporated into project specifications. These measures are identified in Chapter 6.0. Additionally, the

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<sup>1</sup> “Fugitive” is a term used in air quality analysis to denote emission sources that are not confined to stacks, vents, or similar paths.

project would be required to comply with Regulation VIII, Rules 800 through 806, which regulate emissions of fugitive dust.

For informational purposes, emissions due to construction of the project were quantified and compared to the APCD construction thresholds. Construction emissions were calculated using the Sacramento Metropolitan Air Quality Management District's (SMAQMD) Road Construction Emissions Model, Version 8.1.0 (SMAQMD 2016). The Road Construction Emissions Model calculates fugitive PM dust, exhaust, and off-gas emissions from grubbing/land clearing, grading/excavation, drainage/utilities/sub-grade, and paving activities associated with construction projects that are linear in nature (e.g., road or levee construction, pipeline installation, transmission lines). The results are summarized in Table 3.

<b>Table 3</b>						
<b>Summary of Worst-Case Construction Emissions</b>						
<b>(pounds per day)</b>						
	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Max Daily Emissions	6	65	47	0	53	13
<i>APCD Significance Threshold</i>	<i>75</i>	<i>100</i>	<i>550</i>	--	<i>100</i>	--
Significant Impact?	No	No	No	--	No	--
ROG = reactive organic gases; NO <sub>x</sub> = nitrous oxide; CO = carbon monoxide;						
PM <sub>10</sub> = particulate matter less than 10 microns; PM <sub>2.5</sub> = particulate matter less than 2.5 microns						

As shown in Table 3, worst-case emissions are projected to be less than the thresholds for all criteria pollutants. According to the ICAPCD, regardless of the size of the project, the standard mitigation measures for construction equipment and fugitive PM<sub>10</sub> must be implemented at all construction sites. The implementation of discretionary mitigation measures apply to those construction sites which are 5 acres or more for non-residential developments or 10 acres or more in size for residential developments. Because the project site is larger than 5 acres, the project is required to implement all standard and discretionary measures. These measures are discussed in Chapter 6.0.

## 5.2.2 Local Emissions

According to 40 CFR, Part 51, Section 93.123 (5), CO, PM<sub>10</sub>, and PM<sub>2.5</sub> hot spot analyses are not required for construction-related activities, which create a temporary increase in air emissions. Temporary is defined as increases that only occur during a construction phase and last 5 years or less at any individual site. Project construction would begin in 2018, and construction of each phase would last less than 5 years. Thus, no local hot spot is anticipated and a hot spot analysis is not required for construction of the project.

Diesel particulate emissions are pollutants of concern, as described in Section 2.7 of this report. While there is no formal guidance for impact analysis, potential adverse impacts would be increased if construction equipment and truck staging areas were to be located near schools, active recreation areas, or areas of higher population density. There are residences along the project alignment. Thus, a measure to reduce this potential impact has been identified in Chapter 6.0.

## 5.3 Cumulative Impacts

The analysis of project impacts to regional air quality, as performed by SCAG and the APCD in conjunction with the 2016 RTP/SCS and 2017 FTIP process, is a cumulative analysis. The project would conform to the assumptions in the conformity analyses for the 2016 RTP/SCS and 2017 FTIP, which are long-range planning documents that include roadway projects throughout the region. Therefore, the project would not result in a cumulative impact to air quality.

## 6.0 Pollution Abatement Measures

As part of the specifications for construction contracts, the Caltrans requirements relative to air quality impacts must be used on this project. The proposed action must conform to the following provisions in Section 14-9.02, "Air Pollution Control," of the 2015 Standard Specifications:

- Comply with air-pollution-control rules, regulations, ordinances, and statutes that apply to work performed under the Contract, including those provided in Government Code Section 11017 (Public Contract Code Section 10231).
- Do not dispose of material by burning.

It is recommended that the following measures be incorporated into the project to minimize the emission of fugitive dust, PM<sub>10</sub>, and PM<sub>2.5</sub>:

### 1. Standard Mitigation Measures for Construction Equipment

- Use alternative fueled or catalyst-equipped diesel-construction equipment, including all off-road and portable diesel-powered equipment.
- Minimize idling time either by shutting equipment off when not in use or reduce the time idling to five minutes as a maximum.
- Limit, to the extent feasible, the hours of operation of heavy-duty equipment and/or the amount of equipment in use.
- Replace fossil-fueled equipment with electrically driven equivalents (provided they are not run via a portable generator set).

### 2. Enhanced Mitigation Measures for Construction Equipment

- Curtail construction during periods of high ambient pollutant concentrations; this may include ceasing of construction activity during the peak hour vehicular traffic on adjacent roadways.
- Implement activity management (e.g., reschedule activities to reduce short-term impacts).

### 3. Standard Mitigation Measures for Fugitive PM<sub>10</sub> Control

- All disturbed areas, including bulk material storage which is not being actively utilized, shall be effectively stabilized, and visible emissions shall be limited to no greater than 20 percent opacity for dust emissions by using water, chemical stabilizers, dust suppressants, tarps, or other suitable material such as vegetative ground cover.
- All on-site and off-site unpaved roads shall be effectively stabilized, and visible emissions shall be limited to no greater than 20 percent opacity for dust emissions by paving, chemical stabilizers, dust suppressants, and/or watering.
- All unpaved areas of one acre or more with 75 or more average vehicle trips per day shall be effectively stabilized, and visible emissions shall be limited to no greater than 20 percent opacity for dust emissions by paving, chemical stabilizers, dust suppressants, and/or watering.
- The transport of bulk material shall be completely covered, unless six inches of freeboard space from the top of the container is maintained with no spillage and loss of bulk material. In addition, the cargo compartment of all haul trucks is to be cleaned and/or washed at delivery site after removal of bulk material.
- All track-out or carry-out shall be cleaned at the end of each workday or immediately when mud or dirt extends a cumulative distance of 50 linear feet or more onto a paved road within an urban area.
- Movement of bulk material handling or transfer shall be stabilized prior to handling or at points of transfer with the application of sufficient water, chemical stabilizers, or by sheltering or enclosing the operation and transfer line.
- The construction of any new unpaved road is prohibited within any area with a population of 500 or more, unless the road meets the definition of a temporary unpaved road. Any temporary unpaved road shall be effectively stabilized, and visible emissions shall be limited to no greater than 20 percent opacity for dust emission by paving, chemical stabilizers, dust suppressants, and/or watering.

## 7.0 References

### California Air Resources Board (ARB)

- 2000a Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles. Stationary Source Division, Mobile Source Control Division. October 2000.
- 2000b Risk Management Guidance for the Permitting of New Stationary Diesel-Fueled Engines. Stationary Source Division, Emissions Assessment Branch. October 2000.
- 2016 Ambient Air Quality Standards. California Air Resources Board. May 4.
- 2017 California Air Quality Data Statistics. California Air Resources Board Internet Site. <http://www.arb.ca.gov/adam/welcome.html>. Top 4 Summary and Hourly Listing. Accessed September 8, 2017.

### California Department of Conservation (CDC)

- 2000 A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos, California Department of Conservation, Geological Surveys. Available at [ftp://ftp.consrv.ca.gov/pub/dmg/pubs/ofr/ofr\\_2000-019.pdf](ftp://ftp.consrv.ca.gov/pub/dmg/pubs/ofr/ofr_2000-019.pdf).

### El Centro, City of

- 2004 Final General Plan, Circulation Element. February 2004.

### Federal Highway Administration (FHWA)

- 2015 Transportation Conformity Guidance for Quantitative Hot-spot Analyses in PM<sub>2.5</sub> and PM<sub>10</sub> Nonattainment and Maintenance Areas. EPA420-B-15-084. November 2015.
- 2016a Letter from Vincent P. Mammano, Division Administrator, FHWA to Hasan Ikhtrata, Executive Director, SCAG. Subject: Conformity Determination for SCAG 2016 RTP/SCS. Dated June 1, 2016.
- 2016b Letter from Vincent P. Mammano, Division Administrator, FHWA to Hasan Ikhtrata, Executive Director, SCAG. Subject: Conformity Determination for SCAG's 2017 FTIP through Amendment No. 17-01 and RTP/SCS – A Plan for Mobility, Accessibility, Sustainability, and High Quality of Life. Dated December 16, 2016.
- 2016c Memorandum: Updated Interim Guidance on Mobile Source Air Toxic Analysis in NEPA Documents. From Emily Biondi, Acting Director, Office of Natural Environment, to Division Administrators, Federal Lands Highway Division Engineers. October 18, 2016.

### Imperial County Air Pollution Control District (APCD)

- 2007 CEQA Air Quality Handbook. Final Draft. November 6.

- 2009 Final 2009 Imperial County State Implementation Plan for Particulate Matter Less Than 10 Microns in Diameter. August 11, 2009.
- 2010a Final 2009 1997 8-Hour Ozone Modified Air Quality Management Plan. July 13, 2010
- 2010b Final 2009 Reasonably Available Control Technology State Implementation Plan. July 13, 2010.
- 2014 Final Imperial County 2013 State Implementation Plan for the 2006 24-Hour PM<sub>2.5</sub> Moderate Nonattainment Area. December 2, 2014.
- 2017 Draft Imperial County 2017 State Implementation Plan for the 2008 8-Hour Ozone Standard. August 2017.
- Linscott, Law & Greenspan (LLG)
- 2018 Transportation Analysis, Imperial Avenue Extension. LLG Ref. 3-16-2567. March.
- Sacramento Metropolitan Air Quality Management District (SMAQMD)
- 2016 Road Construction Emissions Model, Version 8.1.0.
- Southern California Association of Governments (SCAG)
- 2016a The 2016-2040 Regional Transportation Plan/ Sustainable Community Strategy: A Plan for Mobility, Accessibility, Sustainability and a High Quality of Life. Adopted April 2016.
- 2016b Final 2017 Federal Transportation Improvement Program. FY 2016/17 – 2021/22. September 2016.
- U.S. Environmental Protection Agency (USEPA)
- 1996 EPA Takes Final Step in Phaseout of Leaded Gasoline. January 29.
- 2009 AP-42 Compilation of Air Pollutant Emission Factors. Accessed May 20. Available at <http://www.epa.gov/ttnchie1/ap42/>
- 2016 Health and Environmental Effects of Particulate Matter (PM). Accessed at <https://www.epa.gov/pm-pollution/health-and-environmental-effects-particulate-matter-pm>. Last updated July 1, 2016.
- Western Region Climatic Center (WRCC)
- 2017 Western U.S. Climate Historical Summaries. Accessed at: <https://wrcc.dri.edu/cgi-bin/cliMAIN.pl?ca2713>. September 7, 2017.

## 8.0 List of Preparers

Personnel responsible for preparation of this Air Quality Study include the following:

RECON Environmental, Inc.  
1927 Fifth Avenue  
San Diego, California 92101

Nick Larkin, Project Manager  
Bill Maddux, Senior Noise and Air Quality Specialist  
Jessica Fleming, Associate Noise and Air Quality Specialist  
Sean Bohac, GIS Specialist  
Jennifer Gutierrez, Production Specialist

# ATTACHMENTS

## **ATTACHMENT 1**

2016 Regional Transportation Plan/Sustainable Communities Strategy, Amendment 1 and 2017 Federal Transportation Improvement Program Listings Amendment 17-03.

TABLE 1 Modifications to FTIP Projects

#	COUNTY	LEAD AGENCY	RTP ID	FTIP ID	SYSTEM	ROUTE NAME	DESCRIPTION	COMPLETION YEAR	COST (\$1,000's)	FISCAL IMPACT	REASON FOR AMENDMENT
1	IMPERIAL	EL CENTRO	1161L001	IMP160901	LOCAL HIGHWAY	IMPERIAL AVE	IMPERIAL AVENUE EXTENSION SOUTH - NEW ROADWAY FROM I-8 TO MCCABE ROAD. PHASE 1 INCLUDES 6 NEW LANES ON IMPERIAL AVENUE FROM I-8 TO WAKE AVENUE; AND 2 NEW LANES ON WAKE AVENUE FROM IMPERIAL AVENUE TO CYPRESS DRIVE.	2025	\$5,556	NEW RTP PROJECT COST.	NEW PROJECT
2	LOS ANGELES	EL MONTE	1AL04	LAF3125	LOCAL HIGHWAY	RAMONA BLVD	RAMONA CORRIDOR TRANSIT CENTER ACCESS PROJECT. CONSTRUCT A NEW UNDERPASS STRUCTURE ON RAMONA BLVD UNDER SANTA ANITA AVE TO ACCESS THE LOWER LEVEL OF THE EL MONTE TRANSIT CENTER. THE PROPOSED BUS TUNNEL RAMPS WILL BEGIN EAST OF THE SANTA ANITA AVENUE AND RAMONA BOULEVARD INTERSECTION ON RAMONA BOULEVARD AND THE TUNNEL WILL CONTINUE UNDER SANTA ANITA AVENUE (ALONG ROMONA BOULEVARD) TO THE LOWER LEVEL OF THE EL MONTE TRANSIT CENTER AND INCLUDES 1 BUS ONLY LANE IN EACH DIRECTION.	EXISTING: 2016  REVISED: 2020	EXISTING: \$15,302  REVISED: \$15,830	RTP PROJECT COST INCREASE.	REVISED SCHEDULE AND COST
3	LOS ANGELES	INDUSTRY	LAF5100	LAF5100	LOCAL HIGHWAY	GRAND AVE	SR57/60 CONFLUENCE, IMPROVE GRAND AVENUE INTERSECTION AT GOLDEN SPRINGS DRIVE: WIDEN GRAND AVE, FROM SR-60 FREEWAY TO LAVENDER DRIVE, A DISTANCE OF 0.2 MILES. PROJECT WILL ADD 1 THRU SB LANE AND 2 THRU NB LANE. WIDEN GOLDEN SPRINGS DRIVE BETWEEN COPLEY DR AND RACQUET CLUB DRIVE. ADD WB LEFT-TURN LANE AND A DEDICATED RIGHT-TURN LANE, WIDEN SIDEWALKS AND ADD PEDESTRIAN COUNTDOWN SIGNALS.	EXISTING: 2017  REVISED: 2019	\$16,819	NO CHANGE TO RTP PROJECT COST. NO FISCAL IMPACT.	REVISED SCHEDULE

TABLE 2 Modifications to RTP Projects

#	COUNTY	LEAD AGENCY	RTP ID	SYSTEM	ROUTE	DESCRIPTION	COMPLETION YEAR	COST (\$1,000's)	FISCAL IMPACT	REASON FOR AMENDMENT
1	IMPERIAL	EL CENTRO	1161L001	LOCAL HIGHWAY	IMPERIAL AVENUE	IMPERIAL AVENUE EXTENSION SOUTH - NEW ROADWAY FROM I-8 TO MCCABE ROAD.	2025	\$13,216	NEW RTP PROJECT COST.	NEW PROJECT
2	IMPERIAL	IMPERIAL COUNTY	1161L002	LOCAL HIGHWAY	MENVIELLE ROAD	MENVIELLE ROAD WIDENING, FROM 2 TO 4 LANES BETWEEN CARR ROAD TO SR-98	2025	\$4,432	NEW RTP PROJECT COST.	NEW PROJECT
3	IMPERIAL	VARIOUS AGENCIES	6160002	OTHER	SR-7	<p>EXISTING: EXPANSION OF THE CALEXICO EAST PORT OF ENTRY - THE PROPOSED PROJECT IS TO INCREASE THE NUMBER OF COMMERCIAL VEHICLE INSPECTION LANES AND BOOTHS FROM EXISTING 3 TO 6 LANES AND BOOTHS; AND WIDEN BRIDGE OVER THE ALL-AMERICAN CANAL (CANAL SERVES AS U.S./MEXICO BORDER). SUBMITTED TO STATE BY REGION FOR PNRS NOMINATION AND WILL BE AMENDED INTO UPCOMING RTP.</p> <hr/> <p>REVISED: EXPANSION OF THE CALEXICO EAST PORT OF ENTRY - WIDEN BRIDGE OVER THE ALL-AMERICAN CANAL (CANAL SERVES AS U.S./MEXICO BORDER) AND INCREASE THE NUMBER OF COMMERCIAL VEHICLE LANES FROM EXISTING 3 TO 6 LANES; ADD 6 NEW NORTHBOUND PRIVATELY OWNED VEHICLE (POV) LANES; PEDESTRIAN PATHWAY IMPROVEMENTS INCLUDING SHADDED SIDEWALKS AND TRANSIT LOT (PICK-UP AND DROP-OFF AREA). SUBMITTED TO STATE BY REGION FOR PNRS NOMINATION AND WILL BE AMENDED INTO UPCOMING RTP.</p>	2025	\$90,000	NO CHANGE TO RTP PROJECT COST. NO FISCAL IMPACT.	REVISED DESCRIPTION



## 2017 Federal Transportation Improvement Program

Imperial County  
Local Highway  
Including Amendments 1-10 and 12  
(In \$000's)

ProjectID	County	Air Basin	Model	RTP ID	Program	Route	Begin	End	System	Conformity Category	Amendment	
IMP160408	Imperial	SSAB		7120001	NCR31				L	EXEMPT - 93.126	2	
Description:							PTC	466	Agency	CALEXICO		
Paving of dirt road De Las Flores Street between Eady Avenue and Kloke Avenue to include the installation of curb, gutter and sidewalks												
Fund	ENG	R/W	CON	Total	Prior	2016/2017	2017/2018	2018/2019	2019/2020	2020/2021	2021/2022	Total
CMAQ	9		403	412		9	403					412
AGENCY	2		52	54		2	52					54
IMP160408 Total	11		455	466		11	455					466

ProjectID	County	Air Basin	Model	RTP ID	Program	Route	Begin	End	System	Conformity Category	Amendment	
IMP160402	Imperial	SSAB		7120004	NCR31				L	EXEMPT - 93.126	2	
Description:							PTC	1,233	Agency	CALIPATRIA		
Roadway and Pedestrian improvements on North Brown from East Alamo Street to Delta Street												
Fund	ENG	R/W	CON	Total	Prior	2016/2017	2017/2018	2018/2019	2019/2020	2020/2021	2021/2022	Total
CMAQ	29	25	269	323		29	25	269				323
STP LOCAL	53	26	689	768		53	26	689				768
AGENCY	11	6	125	142		11	6	125				142
IMP160402 Total	93	57	1,083	1,233		93	57	1,083				1,233

ProjectID	County	Air Basin	Model	RTP ID	Program	Route	Begin	End	System	Conformity Category	Amendment	
IMP160409	Imperial	SSAB		7120001	ITS02				L	EXEMPT - 93.126	2	
Description:							PTC	351	Agency	EL CENTRO		
Interconnect existing signal lights along Dogwood Avenue and Danenberg Avenue to the El Centro's master computer to permit for synchronization												
Fund	ENG	R/W	CON	Total	Prior	2016/2017	2017/2018	2018/2019	2019/2020	2020/2021	2021/2022	Total
CMAQ	35		275	310		35	275					310
AGENCY	5		36	41		5	36					41
IMP160409 Total	40		311	351		40	311					351

ProjectID	County	Air Basin	Model	RTP ID	Program	Route	Begin	End	System	Conformity Category	Amendment	
IMP160901	Imperial	SSAB		1161L001	CAX66				L	NON-EXEMPT	3	
Description:							PTC	5,556	Agency	EL CENTRO		
Imperial Avenue Extension South - new roadway from I-8 to McCabe Road. Phase 1 includes 4 new lanes on Imperial Avenue from I-8 to Wake Avenue; and 2 new lanes on Wake Avenue from Imperial Avenue to Cypress Drive.												
Fund	ENG	R/W	CON	Total	Prior	2016/2017	2017/2018	2018/2019	2019/2020	2020/2021	2021/2022	Total
STP LOCAL			2,676	2,676			2,023	653				2,676
AGENCY	490	200	2,190	2,880		590	2,090	200				2,880
IMP160901 Total	490	200	4,866	5,556		590	4,113	853				5,556

## **ATTACHMENT 2**

Conformity Determination for Southern California Association  
of Governments' 2016 Regional Transportation  
Plan/Sustainable Communities Strategy Amendment No.1 and  
2017 FTIP Consistency Amendment No.17-03 Approval



U.S. Department  
of Transportation  
**Federal Highway  
Administration**

**California Division**

May 12, 2017

650 Capitol Mall, Suite 4-100  
Sacramento, CA 95814  
(916) 498-5001  
(916) 498-5001  
(916) 498-5008

In Reply Refer To:  
HDA-CA

Mr. Hasan Ikhtrata, Executive Director  
Southern California Association of Governments  
818 West 7<sup>th</sup> Street, 12<sup>th</sup> Floor  
Los Angeles, CA 90017

Mr. Bruce de Terra, Division Chief  
Transportation Programming Federal Resources Office, M.S. 82  
California Department of Transportation  
1120 N Street  
Sacramento, CA 95814

Dear Mr. Ikhtrata and Mr. de Terra:

**SUBJECT: CONFORMITY DETERMINATION FOR SCAG's 2016 RTP/SCS  
AMENDMENT NO. 1 and 2017 FTIP CONSISTENCY AMENDMENT NO.  
17-03 APPROVAL**

The Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) have completed our reviews of the conformity determination for the Southern California Association of Governments' (SCAG) 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) – *A Plan for Mobility, Accessibility, Sustainability and a High Quality of Life* and 2017 – Amendment No. 1 and Federal Transportation Improvement Program (FTIP) Amendment No. 17-03. A FTA/FHWA air quality conformity determination is required pursuant the Environmental Protection Agency's (EPA) *Transportation Conformity Rule*, 40 Code of Regulations (CFR) Parts 51 and 93, and the United States Department of Transportation's *Metropolitan Planning Rule*, 23 CFR Part 450. SCAG's 2017 FTIP Amendment No. 17-03 was completed to ensure consistency with the amended 2016 RTP/SCS.

FTA/FHWA reviewed SCAG's 2017 FTIP Amendment No. 17-03, received by your letter dated April 17, 2017. As detailed in your letter's enclosure this amendment requests to add fifteen (15) new individual project listings to SCAG's FTIP, and to modify thirty-one (31) individual project listings with removal of four (4) individual project listings previously approved for California Federal Statewide Transportation Improvement Program (FSTIP) inclusion. Pursuant the December 15, 2014 *MOU between the FHWA California Division and FTA Region IX*, and based on our review of information submitted with the State's proposed 2017 FSTIP, which includes

revenues, proposed project funding information to demonstrate financial constraint, and statewide and metropolitan planning process documentation, we accept the proposed FSTIP modification in accordance with the Final Rule on Statewide and Metropolitan Transportation Planning that was published in the May 27, 2016 Federal Register. SCAG's FTIP, including Amendment No. 17-03, is financially constrained as required by the Federal surface transportation programs authorizing legislation and statewide planning, metropolitan planning, and programming regulations. SCAG's FTIP was developed through a continuing, cooperative, and comprehensive transportation planning process in accordance with the metropolitan transportation planning provisions of 23 United States Code (U.S.C.) §134 and 49 U.S.C. Chapter 53. Approval is given with the understanding that eligibility determination of individual projects for funding must be met, and the applicant must ensure satisfaction of all administrative and statutory requirements.

On April 6, 2017 SCAG adopted the 2016 RTP/SCS Amendment No. 1 and 2017 FTIP Amendment No. 17-03 via Resolution No. 17-588-2. The conformity analysis given by SCAG indicates all air quality conformity requirements have been met. Based on our review, and after consultation with the EPA Region IX office in accordance with the procedures outlined in the *National Memorandum of Understanding (MOU) between the Department of Transportation (DOT) and EPA on Transportation Conformity* dated April 25, 2000, we find that SCAG's 2016 RTP/SCS Amendment No. 1 and 2017 FTIP Amendment No. 17-03 conform to the applicable State Implementation Plan (SIP) in accordance with the provisions of 40 CFR Parts 51 and 93.

We jointly agree with approval of the air quality conformity determination for SCAG's 2016 RTP/SCS Amendment No. 1 and 2017 FTIP Amendment No. 17-03. If you have questions pertaining to this conformity finding and/or FSTIP amendment acceptance, feel free to contact Michael Morris of the FHWA California Division's Cal-South office at (213) 894-4014, or by email at [michael.morris@dot.gov](mailto:michael.morris@dot.gov); or Ted Matley of the FTA Region IX office at (415) 734-9468, or by email at [ted.matley@dot.gov](mailto:ted.matley@dot.gov).

Sincerely,

*/s/ Leslie T. Rogers*

Leslie T. Rogers  
Regional Administrator  
Federal Transit Administration



For: Vincent P. Mammano  
Division Administrator  
Federal Highway Administration

## **ATTACHMENT 3**

Southern California Association of Governments'  
Transportation Conformity Working Group  
Project of Air Quality Concern Determination

<b>RTIP ID#</b> <i>(required)</i> 1161L001					
<b>TCWG Consideration Date</b> March 27, 2018					
<b>Project Description</b> <i>(clearly describe project)</i> The project would extend Imperial Avenue from Interstate 8 (I-8) to Wake Avenue as a new four-lane facility, and from Wake Avenue to McCabe Road as a two-lane facility. The project would also construct a two-lane roadway segment to connect the separated portions of Wake Avenue located west and east of the Imperial Avenue extension. The project would also construct a two-lane roadway segment to connect to the portion of Danenberg Drive located east of the Imperial Avenue extension.					
<b>Type of Project</b> <i>(use Table 1 on instruction sheet)</i> New Regionally Significant Street					
<b>County</b> Imperial	<b>Narrative Location/Route &amp; Postmiles:</b> The project is located in the southern portion of the City of El Centro, and would extend Imperial Avenue from I-8 south to McCabe Road. See discussion of lane configuration in project description above.  <b>Postmiles: N/A (not a Caltrans project)</b>  <b>Caltrans Projects – EA# N/A (not a Caltrans project)</b>				
<b>Lead Agency:</b> City of El Centro					
<b>Contact Person</b> Abraham Campos	<b>Phone#</b> (760) 337-5182	<b>Fax#</b> (760) 337-4564	<b>Email</b> acampos@cityo		
<b>Hot Spot Pollutant of Concern</b> <i>(check one or both)</i> <b>PM2.5</b> X <b>PM10</b> X					
<b>Federal Action for which Project-Level PM Conformity is Needed</b> <i>(check appropriate box)</i>					
X	<b>Categorical Exclusion (NEPA)</b>	<b>EA or Draft EIS</b>	<b>FONSI or Final EIS</b>	<b>PS&amp;E or Construction</b>	<b>Other</b>
<b>Scheduled Date of Federal Action:</b> June 2018					
<b>NEPA Assignment – Project Type</b> <i>(check appropriate box)</i>					
Exempt		<b>Section 326 –Categorical Exemption</b>	X	<b>Section 327 – Non-Categorical Exemption</b>	
<b>Current Programming Dates</b> <i>(as appropriate)</i>					
	<b>PE/Environmental</b>	<b>ENG</b>	<b>ROW</b>	<b>CON</b>	
<b>Start</b>	December 2016	December 2016	July 2018	July 2019	
<b>End</b>	June 2018	July 2019	June 2019	December 2026	

**Project Purpose and Need (Summary):** *(attach additional sheets as necessary)*

The purpose of the Imperial Avenue Extension project is to accommodate existing and planned growth and traffic circulation system improvements within the City of El Centro and local unincorporated Imperial County area south of the I 8/Imperial Avenue interchange. The project would also have beneficial results by resolving existing traffic network deficiencies within the City and reducing congestion on 4th Street (SR 86), which is one of the most heavily traveled transportation corridors in the City. Imperial Avenue is a major north-south route through the city, with a southern terminus at the intersection with I-8. Motorists heading south and east from Imperial Avenue must travel along I-8 and exit one mile away at 4th Street (SR 86), which exacerbates the existing congested traffic condition at the 4th Street (SR 86)/I-8 interchange. Motorists heading west from Imperial Avenue must travel along I-8 and exit three miles away at Forrester Road.

**Surrounding Land Use/Traffic Generators** *(especially effect on diesel traffic)*

The project site is surrounded by existing residential development, active farmland, and agricultural drains. Existing residential development is located northwest, northeast, and southeast of the future intersection of Imperial Avenue and Wake Avenue. Existing residential development is also located east of the project site from the northern terminus to Danenberg Drive, and from Manuel Ortiz Avenue to Valleyview Avenue. All other land west of the project site south of the future intersection of Imperial Avenue and Wake Avenue to the southern terminus, east of the project site from Valleyview Avenue to the southern terminus, and south of the project site consists of active farmland. A water treatment plant is located east of the project south of the future intersection with Danenberg Drive. The Date Drain, which consists of an earthen agricultural drain, runs parallel along the entire western edge of the proposed Imperial Avenue extension. The Dahlia Lateral, which consists of a concrete lined agricultural drain, runs parallel along the eastern edge of the proposed Imperial Avenue extension from Danenberg Drive to McCabe Road. Land north of the project site consists of an elevated roadway berm supporting I-8.

**Opening Year: Build and No Build LOS, AADT, % and #trucks, truck AADT of proposed facility**

**Table 1: Existing and Opening Year LOS – Roadway Segment**

Street Segment	Existing Year	Opening Day	
		No Build	Build
<b>La Brucherie Road</b>			
I-8 to Wake Ave	A	A	A
Wake Ave to W. McCabe Rd	A	A	A
<b>Imperial Avenue</b>			
I-8 to Wake Ave	DNE	DNE	A
Wake Ave to Danenberg Dr	DNE	DNE	DNE
Danenberg Dr to Manuel Ortiz Ave	DNE	DNE	DNE
Manuel Ortiz Ave to Valley View Ave	DNE	DNE	DNE
Valley View Ave to W. McCabe Rd	DNE	DNE	DNE
<b>Clark Avenue</b>			
I-8 to Wake Ave	D	F	D
Wake Ave to Danenberg Dr	A	A	A
Danenberg Dr to Manuel Ortiz Ave	A	A	A
Manuel Ortiz Ave to Valley View Ave	A	A	A
Valley View Ave to W. McCabe Rd	D	D	D

**Table 2: Existing and Opening Year AADT and Truck Percentages**

Street Segment	Existing Year			Opening Day					
	AADT Total	AADT Truck	Truck %	No Build			Build		
				AADT Total	AADT Truck	Truck %	AADT Total	AADT Truck	Truck %
<b>La Brucherie Road</b>									
I-8 to Wake Ave	5,130	153	3.0	5,950	178	3.0	4,900	147	3.0
Wake Ave to W. McCabe Rd	3,510	105	3.0	3,770	113	3.0	3,000	90	3.0
<b>Imperial Avenue</b>									
I-8 to Wake Ave	DNE	DNE	DNE	DNE	DNE	DNE	5,100		
Wake Ave to Danenberg Dr	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
Danenberg Dr to Manuel Ortiz Ave	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
Manuel Ortiz Ave to Valley View Ave	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
Valley View Ave to W. McCabe Rd	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE	DNE
<b>Clark Avenue</b>									
I-8 to Wake Ave	10,360	310	3.0	14,210	426	3.0	10,200	306	3.0
Wake Ave to Danenberg Dr	8,240	247	3.0	9,480	284	3.0	9,000	270	3.0
Danenberg Dr to Manuel Ortiz Ave	8,240	247	3.0	9,480	284	3.0	9,000	270	3.0
Manuel Ortiz Ave to Valley View Ave	8,240	247	3.0	9,480	284	3.0	9,000	270	3.0
Valley View Ave to W. McCabe Rd	8,240	247	3.0	9,480	284	3.0	9,000	270	3.0

**RTP Horizon Year / Design Year: Build and No Build LOS, AADT, % and # trucks, truck AADT of proposed facility**

**Table 3: Buildout Year 2040 LOS – Roadway Segment**

Street Segment	2040 Build
<b>La Brucherie Road</b>	
I-8 to Wake Ave	11,100
Wake Ave to W. McCabe Rd	7,800
<b>Imperial Avenue</b>	
I-8 to Wake Ave	24,000
Wake Ave to Danenberg Dr	13,400
Danenberg Dr to Manuel Ortiz Ave	10,500
Manuel Ortiz Ave to Valley View Ave	10,100
Valley View Ave to W. McCabe Rd	8,200
<b>Clark Avenue</b>	
I-8 to Wake Ave	11,000
Wake Ave to Danenberg Dr	11,100
Danenberg Dr to Manuel Ortiz Ave	11,700
Manuel Ortiz Ave to Valley View Ave	11,300
Valley View Ave to W. McCabe Rd	11,000

**Table 2: Buildout Year 2040 AADT and Truck Percentages**

Street Segment	AADT Total	AADT Truck	Truck %
<b>La Brucherie Road</b>			
I-8 to Wake Ave	11,100	333	3.0
Wake Ave to W. McCabe Rd	7,800	234	3.0
<b>Imperial Avenue</b>			
I-8 to Wake Ave	24,000	1,152	6.3
Wake Ave to Danenberg Dr	13,400	844	6.3
Danenberg Dr to Manuel Ortiz Ave	10,500	661	6.3
Manuel Ortiz Ave to Valley View Ave	10,100	636	6.3
Valley View Ave to W. McCabe Rd	8,200	516	6.3
<b>Clark Avenue</b>			
I-8 to Wake Ave	11,000	330	3.0
Wake Ave to Danenberg Dr	11,100	333	3.0
Danenberg Dr to Manuel Ortiz Ave	11,700	351	3.0
Manuel Ortiz Ave to Valley View Ave	11,300	339	3.0
Valley View Ave to W. McCabe Rd	11,000	330	3.0

**Opening Year: If facility is an interchange(s) or intersection(s), Build and No Build cross-street AADT, % and # trucks, truck AADT.**

Opening Year – No build is not shown since these intersections do not currently exist. Intersections #2 through #5 will not be built in the Opening Year. Hence do not exist.

<b>Intersection</b>	<b>North</b>	<b>East</b>	<b>South</b>	<b>West</b>	<b>LOS</b>
1. Imperial Ave / Wake Ave					
AADT	5100	4430	0	1720	B
Truck AADT	320	90	0	30	
Truck Percent	6.3%	2.0%	6.3%	2.0%	
2. Imperial Ave / Danenberg Dr	DNE				
AADT					
Truck AADT					
Truck Percent					
3. Imperial Ave / Manuel Ortiz Ave	DNE				
AADT					
Truck AADT					
Truck Percent					
4. Imperial Ave / Valley View Ave	DNE				
AADT					
Truck AADT					
Truck Percent					
5. Imperial Ave / McCabe Rd	DNE				
AADT					
Truck AADT					
Truck Percent					

**RTP Horizon Year / Design Year: If facility is an interchange (s) or intersection(s), Build and No Build cross-street AADT, % and # trucks, truck AADT**

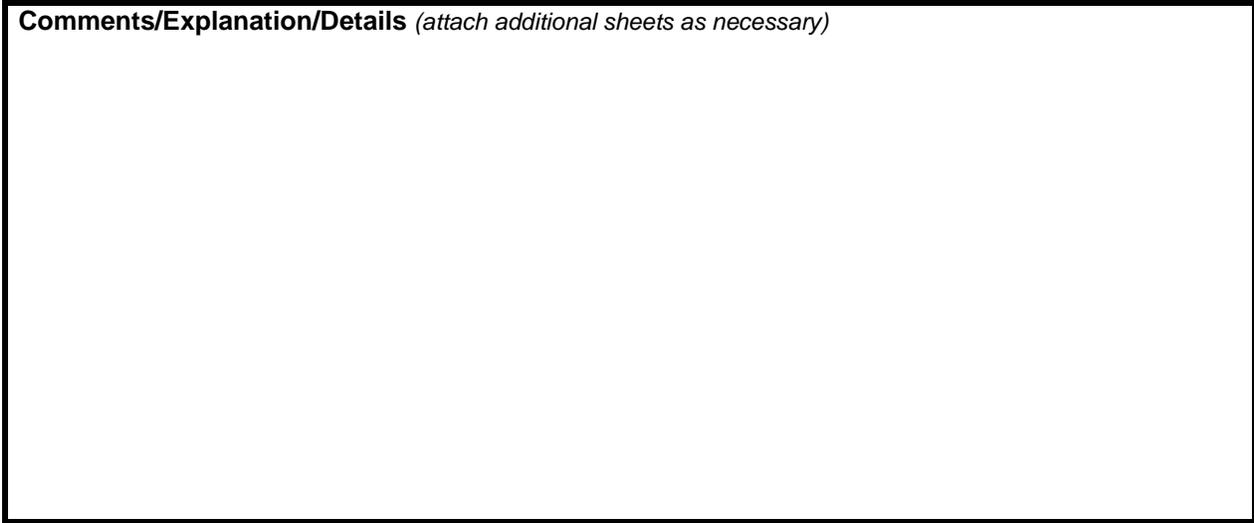
Buildout Year – No build is not shown since these intersections do not currently exist.

Intersection	North	East	South	West	LOS
1. Imperial Ave / Wake Ave					
AADT	24,000	9,540	13,400	3,270	C
Truck AADT	1,510	190	840	70	-
Truck Percent	6%	2%	6%	2%	-
2. Imperial Ave / Danenberg Dr					
AADT	13,400	4,790	10,500	0	B
Truck AADT	840	100	660	0	-
Truck Percent	6%	2%	6%	2%	-
3. Imperial Ave / Manuel Ortiz Ave					
AADT	10,500	3,930	10,100	0	B
Truck AADT	660	80	640	0	-
Truck Percent	6%	2%	6%	2%	-
4. Imperial Ave / Valley View Ave					
AADT	10,100	3,350	8,200	0	B
Truck AADT	640	70	520	0	-
Truck Percent	6%	2%	6%	2%	-
5. Imperial Ave / McCabe Rd					
AADT	8,200	9,840	0	11,510	B
Truck AADT	520	200	0	230	-
Truck Percent	6%	2%	6%	2%	-

**Describe potential traffic redistribution effects of congestion relief (impact on other facilities)**

The project would improve the existing traffic network deficiencies within the city. In Phase 1, existing traffic associated with existing residential development in the vicinity of Wake Avenue destined north would divert to the Phase 1 extension of Imperial Avenue, and a portion of through traffic on La Brucherie Road and Clark Road destined north would divert via Wake Avenue to the Phase 1 extension of Imperial Avenue. In Phases 2 and 3, in addition to the reroute of traffic completed in Phase 1, traffic associated with the existing residential developments adjacent to Danenberg Drive, Manuel Ortiz Avenue, and Valleyview Avenue destined north would reroute to the Imperial Avenue extension instead of Clark Road. Finally, with the connection of Imperial Avenue to McCabe Road in Phase 4, in addition to the rerouting of northbound traffic, traffic associated with the existing residential developments destined south would reroute to the completed Imperial Avenue Extension. As a result of the rerouting of traffic, the proposed project would reduce volumes at existing intersections, thereby reducing delay and LOS. The project includes intersection improvements along the new extension Imperial Avenue to tie the roadway into the existing circulation system, and no other improvement to any other existing intersection is required as the project would not reduce delay or LOS at existing intersections.

**Comments/Explanation/Details** *(attach additional sheets as necessary)*





## MEETING OF THE

# TRANSPORTATION CONFORMITY WORKING GROUP

SOUTHERN CALIFORNIA  
ASSOCIATION OF GOVERNMENTS  
900 Wilshire Blvd., Ste. 1700  
Los Angeles, CA 90017  
T: (213) 236-1800  
www.scag.ca.gov

### REGIONAL COUNCIL OFFICERS

President  
Margaret E. Finlay, Duarte

First Vice President  
Alan D. Wapner, Ontario

Second Vice President  
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Immediate Past President  
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### COMMITTEE CHAIRS

Executive/Administration  
Margaret E. Finlay, Duarte

Community, Economic &  
Human Development  
Rex Richardson, Long Beach

Energy & Environment  
Carmen Ramirez, Oxnard

Transportation  
Curt Hagman, San Bernardino County

**Tuesday, March 27, 2018  
10:00 a.m. – 12:00 p.m.**

**SCAG Main Office  
Policy Committee A Conference Room  
900 Wilshire Blvd., Ste. 1700  
Los Angeles, CA 90017  
213.236.1800**

**Teleconference  
Call-in Telephone: (213) 236-1801  
Conference ID: 396783**

If members of the public wish to review the attachments or have any questions on any of the agenda items, please contact:

Rongsheng Luo at 213.236.1994 or [luo@scag.ca.gov](mailto:luo@scag.ca.gov)

Agendas and Minutes for the Transportation Conformity Working Group are also available at:

<http://www.scag.ca.gov/committees/Pages/CommitteeL2/SingleCommittee.aspx?CID=25>

SCAG, in accordance with the Americans with Disabilities Act (ADA), will accommodate persons who require a modification of accommodation in order to participate in this meeting. SCAG is also committed to helping people with limited proficiency in the English language access the agency's essential public information and services. You can request such assistance by calling (213) 236-1908. We request at least 72 hours (three days) notice to provide reasonable accommodations and will make every effort to arrange for assistance as soon as possible.

# Transportation Conformity Working Group

## AGENDA

	<i>PAGE #</i>	<i>TIME</i>
<b>1.0</b> <b><u>CALL TO ORDER AND SELF-INTRODUCTION</u></b>		<b>Lori Huddleston, Chair</b>
<b>2.0</b> <b><u>PUBLIC COMMENT PERIOD</u></b>		
Members of the public desiring to speak on an agenda item or items not on the agenda, but within the purview of the TCWG, must fill out a speaker's card prior to speaking and submit it to the Staff Assistant. A speaker's card must be turned in before the meeting is called to order. Comments will be limited to three minutes. The Chair may limit the total time for comments to twenty (20) minutes.		
<b>3.0</b> <b><u>CONSENT CALENDAR</u></b>		
3.1 <u>February 6, 2018 TCWG Meeting Minutes</u> <b>Attachment 3.1</b>	3.1-1	
<b>4.0</b> <b><u>INFORMATION ITEMS</u></b>		
4.1 <u>Review of PM Hot Spot Interagency Review Forms</u> <b>Attachments 4.1-1 RIV160101; 4.1-2 1161L001; 4.1-3 LA0G230rev;</b> <b>4.1-4 20179701, 4.1-4 20179701Layout1, 4.1-4 20179701Layout2,</b> <b>4.1-4 20179701Layout3, 4.1-4 20179701Layout4, 4.1-4 20179701Layout5,</b> <b>&amp; 4.1-4 20179701Layout6; 4.1-5 RIV061159rev</b>	4.1-1	45 minutes
4.2 <u>FHWA Survey of Upcoming Project-level Actions Requiring</u> <u>a Conformity Determination</u> <b>Attachments 4.2-1 FHWA Survey; 4.2-2 Map of 1997 8-hour</b> <b>Ozone Nonattainment Areas</b>	Michael Morris, FHWA	10 minutes
4.3 <u>FTIP Update</u>	John Asuncion, SCAG	5 minutes
4.4 <u>RTP Update</u>	Daniel Tran, SCAG	5 minutes
4.5 <u>EPA Update</u> - Standing Update - Sanction Clocks Update	Karina O'Connor and Wienke Tax, EPA	10 minutes
4.6 <u>ARB Update</u> - Standing Update - SIP Update	ARB Representative	10 minutes
4.7 <u>Air Districts Update</u> - Standing Update - AQMP/SIP Update	District Representatives	10 minutes
<b>5.0</b> <b><u>INFORMATION SHARING</u></b>		5 minutes
<b>6.0</b> <b><u>ADJOURNMENT</u></b>		
The next meeting of the Transportation Conformity Working Group will be held on Tuesday, April 24, 2018 at the new SCAG main office in downtown Los Angeles.		

March 2018

### PM Hot Spot Analysis Project Lists

#### Review of PM Hot Spot Interagency Review Forms

March, 2018	Determination
<a href="#">RIV160101 March 2018</a>	
<a href="#">1161L001 March 2018</a>	Not a POAQC - Hot Spot Analysis Not Required (EPA concurrence received via email before the meeting).
<a href="#">LA0G230 March 2018</a>	Not a POAQC - Hot Spot Analysis Not Required (EPA concurrence received via email before the meeting).
<a href="#">20179701 March 2018 Layout3of6</a>	Not a POAQC - Hot Spot Analysis Not Required (EPA concurrence received via email before the meeting).
<a href="#">20179701 March 2018 Layout5of6</a>	
<a href="#">20179701 March 2018 Layout2of6</a>	
<a href="#">20179701 March 2018 Layout4of6</a>	
<a href="#">20179701 March 2018 Layout1of6</a>	
<a href="#">20179701 March 2018</a>	
<a href="#">20179701 March 2018 Layout6of6</a>	
<a href="#">RIV061159 March 2018 Revised</a>	



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