



South Coast  
Air Quality Management District

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FAXED: April 30, 2010

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Mr. Orlando Hernandez, Senior Planner  
Community Development Department  
8353 Sierra Avenue  
Fontana, CA 92335

**Review of the Draft Environmental Impact Report (Draft EIR)  
for the Proposed Fontana Sports Park and Roadway Improvement Project**

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the lead agency and should be incorporated into the Revised Draft or Final Environmental Impact Report (Revised Draft or Final EIR) as appropriate.

Given that recent research has revealed that pollutants found in close proximity to freeways are associated with a variety of adverse health effects, independent of regional air quality impacts, the AQMD staff is concerned about the close proximity (less than 100 feet) of the proposed project to the 210 Freeway. Also, because the proposed project will result in significant localized air quality impacts during construction the AQMD staff recommends that additional mitigation measures be considered to minimize the project's air quality impacts.

Pursuant to Public Resources Code Section 21092.5, AQMD staff requests that the lead agency provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Dan Garcia,

Mr. Orlando Hernandez  
Senior Planner

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April 30, 2010

Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,

A handwritten signature in black ink that reads "Ian V. MacMillan". The signature is written in a cursive style with a large initial "I" and "M".

Ian MacMillan  
Program Supervisor, CEQA Inter-Governmental Review  
Planning, Rule Development & Area Sources

Attachment

IM:DG

SBC100318-03  
Control Number

## **Operational Emissions Analysis and Mitigation Measures:**

### Sensitive Land Use

1. In Section 2.3.2 and Exhibits 3 and 4 (Surrounding Land Uses) of the Draft EIR the lead agency states that the proposed project is located to the north of State Route 210 Freeway and the Citrus Avenue On-ramp, thereby, placing the Fontana Sports Park less than 100 feet north of the State Route 210 Freeway. Given the intended use of the proposed project described in Section 2.0 (Project Description) of the Draft EIR the Fontana Sports Park is considered a sensitive land use according to the California Air Resources Board's Air Quality and Land Use Handbook: A Community Perspective (CARB Land Use Handbook)<sup>1</sup>.

Recent research has revealed that pollutants found in close proximity to freeways are associated with a variety of adverse health effects, independent of regional air quality impacts<sup>2</sup>. These can include reduced lung capacity and growth<sup>3</sup>; cardiopulmonary disease<sup>4</sup>; increased incidence of low birth weight, premature birth, and birth defects<sup>5</sup>; and exacerbation of asthma<sup>6</sup>. In order to address air quality issues such as these that are related to incompatible land uses, CARB published the Land Use Handbook. The CARB Land Use Handbook recommends avoiding siting sensitive land uses (e.g., playgrounds, residences, schools, etc.) within 500 feet of a freeway.

Given these findings, AQMD staff strongly recommends that, prior to finalizing the CEQA process for this project, the lead agency evaluate the potentially significant impact of exposing sensitive receptors to these substantial pollutant concentrations. If these impacts are found to be significant, all feasible mitigation measures should be considered to reduce these impacts.

## **Construction Emissions Air Quality Analysis and Mitigation Measures:**

### Localized PM10 and PM2.5 Mitigation Measures

2. In Section 3.2.3 (Environmental Impacts) the lead agency evaluated localized air quality impacts from construction activities that will occur in close proximity to sensitive receptors (i.e., residential properties) surrounding the project site. As a result, the lead agency's localized construction air quality analysis demonstrates that

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<sup>1</sup> <http://www.arb.ca.gov/ch/handbook.pdf>

<sup>2</sup> "Special Report 17. Traffic-related air pollution: A critical review of the literature on emissions, exposure, and health effects". Health Effects Institute, May 2009; 394 p.

<sup>3</sup> "Effect of exposure to traffic on lung development from 10 to 18 years of age: a cohort study". Gauderman WJ et al., Lancet, February 2007; 369 (9561): 571-7.

<sup>4</sup> "Exposure to traffic and the onset of myocardial infarction". Peters A et al., The New England Journal of Medicine, 351(17):1721-1730

<sup>5</sup> Ritz B, et al. 2002 Ambient air pollution and risk of birth defects in Southern California. Am J Epidemiology, 155:17-25

<sup>6</sup> McConnell R, et al. 2006. Traffic, susceptibility, and childhood asthma. Environ Health Perspectives 114(5):766-72

criteria pollutants including Particulate Matter (PM10) and Fine Particulate Matter (PM2.5) emissions exceed the AQMD's daily significance thresholds primarily due to off-road diesel engine emissions. Therefore, the AQMD recommends that the lead agency consider adding the following mitigation measures to further reduce localized PM10 and PM2.5 air quality impacts from the construction phase of the project, if feasible:

PM10 and PM2.5:

- ❖ Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow,
- ❖ Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site,
- ❖ Reroute construction trucks away from congested streets or sensitive receptor areas,
- ❖ Improve traffic flow by signal synchronization, and ensure that all vehicles and equipment will be properly tuned and maintained according to manufacturers' specifications,
- ❖ Require the use of electricity from power poles rather than temporary diesel or gasoline power generators, and
- ❖ Require all on-site construction equipment to meet EPA Tier 2 or higher emissions standards according to the following:
  - April 1, 2010, to December 31, 2011: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 2 offroad emissions standards. In addition, all construction equipment shall be outfitted with the BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 2 or Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
  - January 1, 2012, to December 31, 2014: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 3 offroad emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
  - Post-January 1, 2015: All offroad diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available.

In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

A copy of each unit's certified tier specification, BACT documentation, and CARB or AQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.

For additional measures to reduce off-road construction equipment, refer to the mitigation measure tables located at the following website:

[www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html)

Also, the lead agency should consider encouraging construction contractors to apply for AQMD "SOON" funds. As an example, incentives could be provided in the bidding process for those construction contractors who apply for AQMD "SOON" funds. The "SOON" program provides up to \$60 million dollars to accelerate clean up of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at the following website:

<http://www.aqmd.gov/tao/Implementation/SOONProgram.htm>