



South Coast
Air Quality Management District

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FAXED: JANUARY 4, 2008

January 4, 2008

Ms. Melinda Pure
Fontana Unified School District
Facilities Planning
9680 Citrus Avenue, P. O. Box 5090
Fontana, CA 92334-5090

Dear Ms. Pure:

**Draft Environmental Impact Report (DEIR) for High School No. 5
November 2007**

The South Coast Air Quality Management District (SCAQMD) 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 in the Final Environmental Impact Report.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Environmental Impact Report. The SCAQMD would be available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Charles Blankson, Ph.D., Air Quality Specialist – CEQA Section, at (909) 396-3304 if you have any questions regarding these comments.

Sincerely

Steve Smith, Ph.D.
Program Supervisor
Planning, Rule Development & Area Sources

Attachment

SS: CB
SBC071121-02
Control Number

**Draft Environmental Impact Report (DEIR) for
Fontana High School No. 5**

URBEMIS 2007 Input and Output Data:

1. According to footnote 2 to Table 5.3-9 of the DEIR, one-quarter of the 45-acre site would be graded at one time. This is the default assumption of the URBEMIS 2007 model, that is, one-quarter of the total acreage is graded on any one day. According to the URBEMIS 2007 output files in Appendix D, total acreage disturbed is 13.52 acres, with only 3.38 acres disturbed per day. As a result, fugitive dust emission estimates are potentially underestimated by over a factor of three. Please explain this apparent discrepancy or revise the total acreage input and rerun the model to reflect actual maximum daily construction emissions for the Final EIR.
2. On page 5.3-20 the lead agency states that 35,000 cubic yards of soil will be imported to raise the site. Review of the URBEMIS 2007 output files in Appendix D indicates that the lead agency did not appear to include emissions from transporting the fill soil or emissions, both off-road and fugitive, from spreading the soil on-site.
3. Table 5.3-10 on page 5.3-21 does not reflect the proposed project's operational emissions presented in the URBEMIS 2007 output printout in Appendix D. Table 5.3-10 presents emissions for operational emissions in the year 2012, while the URBEMIS 2007 output printouts in Appendix D show peak daily operational emissions for the year 2010. For example, URBEMIS 2007 output printouts in Appendix D show that both the summer and winter CO, NO_x and VOC emissions exceed the SCAQMD's recommended significance thresholds. Table 5.3-10 shows substantially lower operational emissions for these pollutants. Please revise the table to accurately reflect the operational data in Appendix D.

Health Risk Assessment:

4. The air dispersion modeling was completed with the rural air dispersion coefficient. SCAQMD requires that the urban air dispersion coefficient be used. Air dispersion modeling should be redone with urban air dispersion coefficient for the Final EIR.
5. The children's health risk was estimated with an exposure duration of four years. The fewest number of years allowed by EPA and OEHHA is nine years. The children's health risk in the Final EIR should be based on a nine year exposure duration in the Final EIR.
6. The health risk assessment was based upon methodology developed by LAUSD. The LAUSD health risk assessment includes a report that details assumptions and calculations. The Final EIR should include a discussion that details the assumptions and methodology used.