



South Coast
Air Quality Management District

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E-Mailed: February 2, 2011
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Community Services Department
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**Review of the Draft Environmental Impact Report (Draft EIR)
for the Proposed Lake Forest Sports Park and Recreation Center 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 final Environmental Impact Report (final EIR) as appropriate.

The AQMD staff is concerned about the project's close proximity (less than 100 feet) to an active mining operation. Given that the proposed project is considered a sensitive land use the AQMD staff is specifically concerned about potential health risk impacts from operational activities at the mine. Therefore, AQMD staff requests that the lead agency conduct a Health Risk Assessment (HRA) to determine that the potential health risk impacts from all mining activities are less than significant or provide a condition of project approval which ensures that all mining activity will cease prior to operation of the proposed project. Also, the AQMD staff recommends that pursuant to Section 15370 of the California Environmental Quality Act (CEQA) Guidelines additional mitigation measures are considered to minimize the project's significant air quality impacts. Details regarding these comments are attached to this letter.

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

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to address these issues and any other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,



Ian MacMillan

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

Attachment

IM:DG

ORC101228-02
Control Number

Health Risk Impacts

1. Based on the project description found in chapter two of the draft EIR the proposed project is located adjacent to an active mining operation (i.e., Baker Ranch Property) that was scheduled to cease activity on November 15, 2010. However, according to the lead agency an active mining permit remains at the Baker Ranch Property.¹ The proposed project (i.e., recreational park) is considered a sensitive land², therefore, AQMD staff is concerned about the potential health risk impacts from mining activity that could occur less than 100 feet from the project site. As a result, the AQMD staff requests that the lead agency conduct a HRA to evaluate the potential health risk impacts to sensitive receptors at the project site from toxic air pollutants emitted by the mining operation or provide a condition of approval that ensures mining activity will cease at the Baker Ranch Property prior to the operational phase of the proposed project. In the event that a HRA demonstrates significant impacts the lead agency should provide mitigation to minimize these impacts pursuant to Section 15370 of the CEQA Guidelines.

Mitigation Measures for Construction Air Quality Impacts

2. Given that the lead agency's construction air quality analysis demonstrates significant air quality impacts from NOx, PM10 and PM2.5 emissions the AQMD staff recommends that the lead agency provide additional mitigation pursuant to CEQA Guidelines §15370. Specifically, AQMD staff recommends that the lead agency minimize or eliminate significant adverse air quality impacts by adding the mitigation measures provided below.
 - 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,
 - Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation,
 - 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 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export).

¹ Based on AQMD staff's phone communication with Ms. Cheryl Kuta in January of 2011.

² California Air Resources Board. April 2005. "Air Quality and Land Use Handbook: A Community Health Perspective." Accessed at: <http://www.arb.ca.gov/ch/landuse.htm>

Further, AQMD staff recommends that the lead agency revise Mitigation Measure AQ-1 as follows:

- During project construction, all internal combustion engines/construction equipment operating on the project site will meet EPA-Certified Tier 2 emissions standards, or higher according to the following:
 - ✓ Project Start, 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 SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.
 - ✓ Encourage construction contractors to apply for AQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for AQMD "SOON" funds. The "SOON" program provides funds 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>

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.