



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

April 13, 2006

Gene Fong
Division Administrator
Federal Highway Administration
650 Capitol Mall Suite 4-100
Sacramento, CA 95814

Subject: Draft Environmental Impact Statement (EIS) for Big Bear Replacement Bridge Project, San Bernardino County, CA (CEQ #20060063)

Dear Mr. Fong:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508) and Section 309 of the Clean Air Act. Based on our review, we have rated the proposed project as Lack of Objections (LO). A Summary of *EPA Rating Definitions* is enclosed.

We recognize the importance of addressing the need to improve the existing bridge and intersection, and commend the Federal Highway Administration (FHWA) and California Department of Transportation (Caltrans) on a well-prepared Draft Environmental Impact Statement (EIS). Because the project is within the San Bernardino National Forest, we encourage FHWA and Caltrans to clarify coordination with and confirm needed approvals and requirements from the United States Forest Service in the Final EIS. We also encourage FHWA and Caltrans to incorporate into the Final EIS referenced materials (including a signed Memorandum of Agreement) resulting from coordination with the State Historic Preservation Officer. These recommendations, as well as others pertaining to bicycle connectivity and construction emissions reductions, are further described in our enclosed comments.

EPA appreciates the opportunity to review this Draft EIS. When the Final EIS is released for public review, please send two copies to the address above (mail code: CED-2). If you have questions, please contact me at 415-972-3988 or Connell Dunning, the lead reviewer for this project. Connell can be reached at 415-947-4161 or dunning.connell@epa.gov.

Sincerely,

/s/ Connell Dunning for

Duane James, Manager
Environmental Review Office

Enclosures:
Summary of EPA Rating Definitions
Detailed Comments

cc: Boniface Udotor, Caltrans
Johathan Snyder, Fish and Wildlife Service
Veronica Magnuson, United States Forest Service

Coordination with United States Forest Service

The Draft Environmental Impact Statement (EIS) indicates that the proposed project is entirely on lands managed by the United States Forest Service (USFS), and will therefore require a USFS transportation easement and temporary use permit (page 51). The Draft EIS further identifies that the USFS may either complete their own National Environmental Policy Act (NEPA) finding or may adopt the Federal Highway Administration (FHWA) and California Department of Transportation (Caltrans) Draft EIS before issuing the temporary use permit.

Recommendations:

Because this project requires action by the USFS, Caltrans and FHWA should initiate and complete the required USFS actions and approvals prior to publication of the Final EIS and document these actions in the Final EIS and Record of Decision (ROD).

Alternatively, the Final EIS should identify a schedule for completing required USFS measures prior to project implementation.

Cultural Resources

According to the Draft EIS, the FHWA has begun consultation under Section 106 of the National Historic Preservation Act. The Draft EIS also states that a Memorandum of Agreement (MOA) and a variety of mitigation measures will be developed as part of the Section 106 consultation process.

Recommendations:

Include in the Final EIS and ROD the completed Section 106 MOA and specific mitigation measures developed for this project. Describe how specific mitigation measures will reduce impacts from the construction and operation of the proposed project

Traffic and Transportation – Bicycle Connectivity

The Draft EIS identifies that the USFS would like a future walking/biking path around Big Bear Lake (page 81). However, Caltrans and FHWA have determined that inclusion of a designated bike path on the improved bridge is not appropriate due to lack of continuity with other pathways and the short length of the project. Via our phone conversations with FHWA and Caltrans, EPA was informed that the project would be designed to accommodate future bicycle lanes (through restriping) should a future bicycle transportation plan be completed for the lake.

Recommendation:

Identify in the Final EIS how the current proposed designs for Alternative 4 and 5 will not preclude a dedicated bicycle lane in the future, should a bicycle path around the lake

be identified and constructed. The Final EIS should describe how the proposed design could provide for bicycle use through minor changes such as restriping.

Construction-related Emissions

Construction emissions from the proposed project may result in human exposure to diesel exhaust, which includes particulate matter less than 2.5 microns in diameter (PM_{2.5}). Older adults, people with heart and lung disease, and children are particularly sensitive to fine particle exposure. Studies have shown a significant association between exposure to PM_{2.5} and adverse health outcomes, including asthma, respiratory disease, and premature death. Given the adverse health effects for PM_{2.5} and diesel exhaust exposure, EPA recommends that the Final EIS include mitigation measures for construction emissions. The Draft EIS indicates that a PM_{2.5} analysis will be completed once guidance is finalized.

Recommendations:

Include a PM_{2.5} analysis and a Construction Emissions Mitigation Plan for fugitive dust and diesel PM (DPM) in the Final EIS and adopt this plan in the ROD. EPA recommends the following mitigation measures be incorporated in the Construction Emissions Mitigation Plan, where feasible and appropriate, in order to reduce impacts associated with emissions of PM₁₀, DPM, and air toxics from construction-related activities:

- Establish an activity schedule designed to minimize traffic congestion around the construction site.
- Utilize EPA-registered particulate traps and other appropriate controls to reduce emissions of diesel particulate matter and other pollutants at the construction site.
- Locate construction equipment and staging zones away from sensitive receptors such as children and the elderly as well as away from fresh air intakes to buildings and air conditioners.
- Use low sulfur fuel (diesel with 15 parts per million or less).
- Reduce trips and unnecessary idling from heavy equipment.
- Lease newer and cleaner equipment (1996 or newer).
- Periodically inspect construction sites to ensure construction equipment is properly maintained at all times.