



South Coast Air Quality Management District

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FAXED: March 10, 2006

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Mr. Aron Liang, Senior Planner
City of San Bernardino
Development Services Department
300 North D Street
San Bernardino, CA 92418

Draft Environmental Impact Report (Draft EIR) for the Proposed Northpointe Professional Office and Commercial Retail Project

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 into 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 adoption of the Final Subsequent Environmental Impact Report. The SCAQMD staff would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

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

Attachment

SS:GM

SBC060125-02
Control Number

**Draft Mitigated Negative Declaration
for the Proposed Tentative Tract Map 33255**

Localized Significance Threshold

1. Consistent with the SCAQMD's environmental justice program and policies, the SCAQMD recommends that the lead agency evaluate localized air quality impacts. Because the proposed site is located near existing single-family residential uses (page 3-1 in the Draft EIR), a localized air quality analysis may be warranted to ensure that any nearby residents are not adversely affected by the construction activities that are occurring in close proximity. SCAQMD guidance for performing a localized air quality analysis can be found at the following web address: <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>.

Construction Emission Estimates

2. Paragraph (c) on page 4.1-12 of the Draft EIR incorrectly states that Rule 403 prohibits a concentration of 100 micrograms per cubic meter as the difference between upwind and downwind samples, averaged over five hours. The correct concentration is 50 micrograms per cubic meter averaged over five hours.
3. At the top of page 4.1-13, the lead agency states that aqueous diesel fuel is not commercially available. This statement is not correct as various types of fuels are currently available. Therefore, the lead agency should investigate the availability of emulsified diesel fuels.

Operational Emission Estimates

4. There appears to be an inconsistency between the worst-case estimate for vehicle trips used in the air quality and traffic analyses. In the Air Quality Assessment of the Draft EIR, the lead agency has used the figure of 5,669 for the number of trips to estimate vehicular emissions but lists the number of net new trips as 6,217 in Table F – Project Trip Generation in the Traffic Impact Analysis. The South Coast Air Quality Management District (SCAQMD) staff believes that the number of trips assumed in the air quality and traffic analyses should be consistent, as the number of vehicle trips are directly related to the vehicle emissions and traffic congestion. Therefore, if the correct number of trips is 6,217, the lead agency should revise the vehicular emissions estimate in Table 7 of the Air Quality Assessment for total project emission in the Final EIR.