



South Coast Air Quality Management District

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August 15, 2019

San Bernardino International Airport Authority
Attention: Mark Gibbs – Director of Aviation
1601 East Third Street, Suite 100
San Bernardino California 92408

Re: Eastgate Air Cargo Facility – Draft Environmental Assessment

Dear Mr. Gibbs:

The South Coast Air Quality Management District (South Coast AQMD) has previously submitted comments under the CEQA process regarding the Eastgate Air Cargo project put forward by the San Bernardino International Airport Authority (SBIAA). The South Coast AQMD appreciates the SBIAA's actions to address our concerns. Immediately prior to South Coast AQMD's submittal of comments, San Bernardino was identified as an AB 617 community which requires the South Coast AQMD to work with the community and other stakeholders to identify and address community concerns in disadvantaged communities suffering from disproportionate air pollution impacts. AB 617 was approved into law in 2017, however, the first communities were not identified until September, 2018. The timing of the AB 617 community designations precluded consideration and inclusion of AB 617 factors in our CEQA comments. Consequently, we note the Eastgate Air Cargo project is being proposed in an area heavily impacted by air pollution and poses important environmental justice issues. The Eastgate Environmental Assessment (EA) shows that the project's NO_x emissions are 18 times above the South Coast AQMD significance level for CEQA. We believe there are opportunities to further work with community groups to explore whether additional mitigation measures can be identified and implemented.

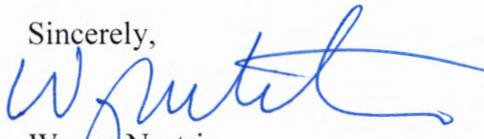
The National Environmental Policy Act ("NEPA") process presents an opportunity for the FAA and SBIAA to reach out to community groups and address environmental justice concerns. We believe it is especially important that the agencies ensure the project does not result in disproportionate impacts, particularly localized air quality impacts. For example, we notice that the NEPA analysis of the impacts on the federal 1-hour NO₂ standard uses the 98th percentile averaged over a five year period rather than a three year period, which is the actual form of the federal standard. Given that the modeled NO₂ impacts were so close to exceeding the federal standard, we recommend that the agencies re-analyze the project's impacts using the proper form of the standard. We would also like to see an explanation of how hourly background NO₂ levels were modeled. It is not appropriate to pair hourly monitored background and modeled concentrations when analyzing impacts. We encourage the SBIAA and FAA to more fully explore these impacts and if appropriate, prepare a full Environmental Impact Statement.

We have also been informed by community representatives that more time is needed for them to fully understand the project and potential mitigation measures. There are important considerations for a project of this size with widespread impacts in an environmental justice area identified under AB 617, including, but not limited to:

- Greater interaction by the SBIAA and the FAA with the community to identify additional strategies to mitigate the impacts of this project. This includes meetings with community groups, the SBIAA and the developer to discuss additional mitigation measures, such as a Community Benefits Agreement. Additional written and enforceable mitigation commitments should be made given the size of the project and its impact on the community. The South Coast AQMD offers to provide technical assistance to the community, the developer and the SBIAA to assist with developing written enforceable practical mitigation measures and adequate community engagement.
- We recommend additional hearings with adequate notice including advertisement of the hearing dates in Spanish and Vietnamese media, and include leaflets about the hearing dates and purpose in both languages, making it clear that simultaneous verbal translation will be provided.
- Additional hearings, with translation services, would ensure there is an adequate process for the public to understand the instructions in their own language for those wishing to give verbal testimony, to help them engage in the process and give comments as well as hear and understand comments from other stakeholders.
- Prior to any additional hearings, basic informational and educational materials about the project should be provided to the community in both Spanish and Vietnamese, including a summary of the impacts identified in the EA.

We appreciate your consideration of these comments and look forward to continuing to work together to reduce air pollution.

Sincerely,



Wayne Nasti
Executive Officer

WN:JW:BB/jwl

cc: Mr. Mark McClardy, Federal Aviation Administration
Mr. David Kessler, Federal Aviation Administration
Mr. Mike Stoker, U.S. EPA Region 9
Ms. Connell Dunning, U.S. EPA Region 9
Mr. Richard Corey, California Air Resources Board