



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:

December 6, 2022

[Aron.Liang@sbccounty.lus.gov](mailto:Aron.Liang@sbccounty.lus.gov)

Aron Liang, Planning Manager  
Land Use Services Department - Planning Division  
County of San Bernadino  
385 North Arrowhead Avenue, First Floor  
San Bernardino, CA 92415-0187

## **Mitigated Negative Declaration (MND) for the Proposed Arrowhead Commercial Retail Plaza Project (Proposed Project)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The County of San Bernadino is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. The following comments include recommended revisions to the CEQA localized air quality impacts analysis during construction and operation and South Coast AQMD permits that the Lead Agency should incorporate in the Final MND.

### South Coast AQMD Staff's Summary of Project Information in the MND

Based on the MND, the Lead Agency proposes to construct a 2,400 square feet convenience store, a gas station with a total of 12 pumping stations and annual throughput of 1 million gallons, a 2,500 square feet drive-thru restaurant, and an 11,877 square feet hotel with a total of 87 rooms on five floors.<sup>1</sup> The Proposed Project is located at 18497 Valley Boulevard at the southwest corner of Valley Boulevard and Linden Avenue on a 2.78-acre vacant land in the unincorporated community of Bloomington.<sup>2</sup> Based on a review of aerial photographs, South Coast AQMD staff found that the nearest sensitive receptor (e.g., mobile home park) is within 100 feet west of the Proposed Project. Construction of the Proposed Project is anticipated to begin in 2023, and operation is expected to start in 2024.<sup>3</sup>

### South Coast AQMD Staff's Comments

#### *Localized Air Quality Impacts Analysis for Construction and Operation Activities*

South Coast AQMD has developed both regional and localized significance thresholds. South Coast AQMD staff recommends that the Lead Agency quantify criteria pollutant emissions and compare the emissions to South Coast AQMD's CEQA regional pollutant emissions significance

---

<sup>1</sup> MND. Page 1.

<sup>2</sup> *Ibid.* Page 1-2.

<sup>3</sup> *Ibid.* Page 16.

thresholds<sup>4</sup> and localized significance thresholds (LSTs)<sup>5</sup> to determine the Proposed Project's air quality impacts. The localized analysis can be conducted by either using the LST screening tables or performing dispersion modeling. However, the Lead Agency only includes the regional air quality impacts from the Project's construction and operation activities but not the LST air quality impacts analysis in the MND.

South Coast AQMD staff recommends that the Lead Agency revise the air quality impacts analysis, including the localized emissions from construction and operation activities, and compare it to South Coast AQMD LST significance thresholds to determine the Proposed Project's localized air quality impacts in the Final MND. If the localized air quality impacts analysis is not included in the Final MND, the Lead Agency should provide reasons for not having them supported by substantial evidence in the record.

#### *South Coast AQMD Permits and Responsible Agency*

If the implementation of the Proposed Project would require the use of stationary equipment, including but not limited to emergency generators, fire water pumps, boilers, etc., permits from South Coast AQMD are required. In addition, the Proposed Project has included the development of a gas station; hence, the Lead Agency should discuss South Coast AQMD Rules that are applicable, such as Rule 461 – Gasoline Transfer and Dispensing<sup>6</sup> in the Final MND. The Final MND should include a discussion on stationary equipment requiring South Coast AQMD permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project. Any assumptions used for the stationary sources in the Final MND will also be used as the basis for the permit conditions and limits for the Proposed Project. Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions on permits. For more general information on permits, please visit South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>.

#### Conclusion

According to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When the Lead Agency's position is at variance with recommendations raised in the comments, the issues raised in the comments should be addressed in detail, giving reasons why specific comments and suggestions are not accepted. There should be good faith and reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision-makers and the public who are interested in the Proposed Project.

---

<sup>4</sup> South Coast AQMD's CEQA regional pollutant emissions significance thresholds can be found at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>.

<sup>5</sup> South Coast AQMD's guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

<sup>6</sup> South Coast AQMD Rule 461 – Gasoline Transfer and Dispensing. Access at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-461.pdf>.

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Danica Nguyen, Air Quality Specialist, at [dnguyen1@aqmd.gov](mailto:dnguyen1@aqmd.gov) should you have any questions.

Sincerely,

*Sam Wang*

Sam Wang

Program Supervisor, CEQA-IGR

Planning, Rule Development, and Implementation

SW:DN

SBC221108-14

Control Number