



South Coast
Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

FAXED: OCTOBER 9, 2007

October 9, 2007

Mr. Michael Burrows
San Bernardino International Airport Authority
294 South Leland Norton Way, Suite 1
San Bernardino, CA 92408

Dear Mr. Burrows:

Mitigated Negative Declaration (MND) for
The SBIA Corporate Aviation Center

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 in the Final Mitigated Negative Declaration.

Please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Mitigated Negative Declaration. The SCAQMD would be available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Charles Blankson, Ph.D., Air Quality Specialist – CEQA Section, at (909) 396-3304 if you have any questions regarding these comments.

Sincerely

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

Attachment

SS: CB

SBC070907-05
Control Number

cc Mr. Kent Norton, Michael Brandman Associates, 621 Carnegie Drive, Suite 100,
San Bernardino, CA 92408

**Mitigated Negative Declaration (MND) for the
SBIA Corporate Aviation Center**

1. Urbemis 2007

The lead agency should also be aware that URBEMIS 2007 is now available and should be used for the air quality analysis of this and all future projects instead of URBEMIS 2002. URBEMIS 2007 calculates PM2.5 emissions, which were not calculated by the lead agency in the MND.

2. Project Size:

It is not clear from the project description the actual size of the proposed developments. On page five of the MND the lead agency states that new corporate and general aviation users would be housed in approximately 403,835 square feet of new hangar and support buildings. On page 26 the lead agency states that daily vehicle trips are based on 1.4 million square feet of hangar space. The lead agency then states that "Exclusive or specific dedicated uses represent approximately 346,000 square feet of space including over 200,000 square feet for governmental law enforcement, and almost 440,000 square feet for private flight training facilities and air ambulance services." Finally, the lead agency states that the project would support 1.058 million square feet of non-exclusive corporate and general aviation uses.

Review of the URBEMIS 2002 output file indicates that the modeled air quality emissions are based on Retail/Institutional, etc., land uses with only 100,000 square feet of building area. Further, the model output shows that only eight acres of the 32-acre site will be disturbed. Given these apparent discrepancies, SCAQMD staff is concerned that the proposed project's construction and operational air quality impacts have been underestimated. The model inputs should be revised and the model rerun and the new output presented in the final CEQA document or the lead agency should explain these apparent discrepancies.

3. Multiple Projects and Cumulative Impacts:

It is unclear what the relationship is between the currently proposed project and the project evaluated in the July 2007 Mitigated negative Declaration for the San Bernardino Airport Facility Improvements Project. These two projects appear to be related projects that are pieces of a single larger project. Further, it is not clear whether the two proposed projects' construction and operation would overlap thus causing overlapping and therefore, potentially significant adverse air quality

impacts. Please explain why these two apparently related projects were not considered together in a single CEQA document.

4. Aircraft Emissions

The SCAQMD continues to be concerned about aircraft emissions at the proposed airport facility. Unlike the July 2007 MND for the San Bernardino Airport Facility Improvements Project, the lead agency did not quantify aircraft emissions, but simply stated that general aviation uses/users from the Rialto Municipal Airport would be relocated to the currently proposed site. Even if this were true these relocated aircraft emissions would affect a different set of local sensitive receptors. The lead agency should perform a health risk assessment evaluating the effects of aircraft emissions on local sensitive receptors.

5. Mitigation Measures

In addition to the air quality mitigation measures on page 28 of the MND, the lead agency should require all applicable mitigation measures identified in the SCAQMD's August 17, 2007 comment letter on the MND for the San Bernardino Airport Facility Improvements Project. A copy of the August 17, 2007 letter is attached and incorporated herein by reference.