



# South Coast Air Quality Management District

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SENT VIA E-MAIL:

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**Initial Study/Mitigated Negative Declaration (IS/MND) for the  
San Bernardino County Fire Station No. 227 (Proposed Project)  
(SCH No: 2025060902)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to review the above-mentioned document. The County of San Bernardino is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff has provided a brief summary of the project information and prepared the following comments which are organized by topic of concern.

**Summary of Proposed Project Information in the IS/MND**

Based on the IS/MND, the Proposed Project consists of the construction of a new fire station to replace the existing Fire Station No. 227, which has been in operation since 1953. The new facility would be developed on a 1.21-acre site within the Arrowhead Elementary School property and includes a 10,764-square-foot fire station building, a 400-square-foot storage building, and a 1,400-square-foot steel-roofed parking lot canopy. The site would also include a 1,000-gallon fuel tank and a backup generator.

The new fire station would accommodate nine on-duty firefighters and include essential facilities such as apparatus bays, living quarters, administrative offices, and public areas. Sensitive receptors, including single-family and multi-family residences, are located within a 0.25-mile radius of the project site. The closest residential use is the Avalon Apartments, approximately 75 feet from the project site. Construction is anticipated to begin in early 2026 and would last up to 18 months.

**South Coast AQMD Comments**

*South Coast AQMD Air Permits and Role as a Responsible Agency*

If implementation of the Proposed Project would require the use of new or replacement of stationary and portable sources, including but not limited to emergency generators, fire water pumps, boilers, etc., air permits from South Coast AQMD will be required. The Project proposes the installation of a 1,000-gallon fuel tank, and a back-up generator.<sup>1</sup> The analysis acknowledges that this is a diesel emergency backup generator, and that diesel consumption is expected to be minimal.<sup>2</sup> The IS/MND state that this generator would be operated in compliance with South Coast AQMD permit requirements, including adherence to Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines<sup>3</sup>.

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<sup>1</sup> Initial Study for San Bernardino County Fire Station No. 227, p. 3. Accessed at: [https://pfm.sbcounty.gov/wp-content/uploads/sites/99/Initial\\_Study\\_for\\_San-Bernardino-County-Fire-Station-No.-227.pdf](https://pfm.sbcounty.gov/wp-content/uploads/sites/99/Initial_Study_for_San-Bernardino-County-Fire-Station-No.-227.pdf)

<sup>2</sup> Initial Study for San Bernardino County Fire Station No. 227, p. 50. Accessed at: [https://pfm.sbcounty.gov/wp-content/uploads/sites/99/Initial\\_Study\\_for\\_San-Bernardino-County-Fire-Station-No.-227.pdf](https://pfm.sbcounty.gov/wp-content/uploads/sites/99/Initial_Study_for_San-Bernardino-County-Fire-Station-No.-227.pdf)

<sup>3</sup> South Coast AQMD. Rule 1470 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf>

However, the statement in Appendix 2 – the Air Quality and Global Climate Change Impact Analysis Technical Report, that Rule 1470 “limits maintenance and testing to 20 hours per day”<sup>4</sup> appears to be incorrect. South Coast AQMD Rule 1470 typically limits non-emergency operation (e.g., maintenance and testing) of emergency standby diesel engines to only **20 hours per year**. Please revise this statement in the Final IS/MND for accuracy.

It is important to note that when air permits from South Coast AQMD are required, South Coast AQMD becomes a Responsible Agency under CEQA, rather than a Commenting Agency. As stated in CEQA Guidelines Section 15086, the Lead Agency must consult with Responsible Agencies during the environmental review process. Additionally, Section 15096 outlines the responsibilities of Responsible Agencies, including making an independent determination on the adequacy of the CEQA document when issuing discretionary approvals.

Please contact South Coast AQMD’s Engineering and Permitting staff at (909) 396-3385 for questions regarding what types of equipment would require air permits. For more general information on permits, please visit South Coast AQMD’s webpage at <https://www.aqmd.gov/home/permits>.

### Conclusion

The Lead Agency is recommended to revise the CEQA analysis to address the aforementioned comments and provide the necessary evidence to sufficiently support the conclusions reached. If the requested information and analysis are not included in the final CEQA document, either the Final IS/MND or other type of CEQA document, the Lead Agency should provide reasons for not doing so. Pursuant to California Public Resources Code Section 21092.5(b) and CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the IS/MND for adoption together with any comments received during the public review process and notify each public agency when any public hearings are scheduled. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final IS/MND. When responding to issues raised in the comments, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided. In addition, if the Lead Agency decides to adopt the Final IS/MND, please provide South Coast AQMD with a notice of any scheduled public hearing(s).

Thank you for the opportunity to provide comments. 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 Jivar Afshar, Air Quality Specialist, at [jafshar@aqmd.gov](mailto:jafshar@aqmd.gov) should you have any questions.

Sincerely,

*Sam Wang*

Sam Wang

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Planning, Rule Development & Implementation

SW:JA

SBC250624-11

Control Number

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<sup>4</sup> Appendix 2 – Air Quality and Global Climate Change Impact Analysis Technical Report, p. 22. Accessed at: [https://pfm.sbcounty.gov/wp-content/uploads/sites/99/Initial\\_Study\\_for\\_San-Bernardino-County-Fire-Station-No.-227.pdf](https://pfm.sbcounty.gov/wp-content/uploads/sites/99/Initial_Study_for_San-Bernardino-County-Fire-Station-No.-227.pdf)