



South Coast Air Quality Management District

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Draft Mitigated Negative Declaration (Draft MND) for the Proposed Big Bear Alpine Zoo Relocation 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 CEQA document.

In the project description, the lead agency proposes demolition of the existing facility, grading with soil import of approximately 25,000 cubic yards of fill and construction of several structures. Building construction will include a 1,800 square foot education center with classrooms, a 700 square foot amphitheater, a 7,600 square foot administration building, 3,500 square feet of retail space, maintenance areas, restrooms, paved parking and other miscellaneous support buildings. In addition, overflow parking would exist using an existing unpaved parking area north of the proposed site by agreement with the lot owner. Construction would take approximately 18 months and be completed in 2014.

In estimating localized construction and operational air quality impacts, the lead agency concluded that both construction and operational localized impacts were less than significant. Since operational impacts from the Overflow Parking Lot exceed the significance thresholds for PM10 and PM2.5 as shown in Tables 8 and 5 in the Assessment, the lead agency has not demonstrated that operational localized impacts are less than significant. The SCAQMD staff recommends that localized operational daily emissions be shown in the Final MND comparing them with the applicable thresholds of significance. Since it is also noted in the project description and in an aerial map inspection that sensitive receptors are located within a quarter mile of the project site (residential properties located north, east and west of the proposed project), the SCAQMD staff recommends the following measures to ensure that any nearby sensitive receptors are not adversely affected by the operational activities that are occurring in close proximity. Specifically, the unpaved overflow parking area north of the project site could create potential adverse fugitive dust impacts to surrounding residences from

vehicles using that parking area. If those impacts are found to be significant, the SCAQMD staff recommends mitigation measures that could include the application of soil stabilizers according to manufacturer's specifications, enforcement of a reduced driving speed, paving the overflow parking area or consideration of other mitigation measures.¹

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. The SCAQMD staff is available 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,



Ian MacMillan
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IM:GM

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¹ http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html