



# South Coast Air Quality Management District

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SENT VIA E-MAIL:

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**Notice of Intent to Adopt an Initial Study/Mitigated Negative Declaration (IS/MND) for the Proposed Bloomington Truck & Trailer Maintenance Facility Project (Proposed Project) (SCH No. 2025010178)**

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

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

Based on the IS/MND, the Proposed Project's applicant requests approval of a Zoning Amendment from Single Residential to Community Industrial and Conditional Use Permit to allow for the renovation, construction, and operation of an existing truck tractor storage facility with maintenance repair capacity.<sup>1</sup>The Proposed Project is located at 11317 Lilac Avenue, Bloomington.<sup>2</sup> The current structures at the Proposed Project site would be demolished, rebuilt, and improved as one new enclosed 15,000-square-foot building.<sup>3</sup> In addition, the existing office building and shop on-site would be rebuilt at the exact location with the same square footage and serve the same uses as office and storage.<sup>4</sup> The number of tractors under the Proposed Project would remain the same as the current conditions.<sup>5</sup> Based on the review of aerial photographs, Staff found that the nearest sensitive receptors (e.g., residents) are adjacent to the east and within 100 feet to the north of the Proposed Project site. According to the IS/MND, construction is anticipated to start in 2023 and complete in 2024.<sup>6</sup>

**South Coast AQMD Comments**

*Completion of CEQA Air Quality Impacts Analysis During Construction and Operation*

According to the IS/MND, the air quality analysis provided by the Lead Agency includes only daily emission tables for determining the significance of the regional air quality impacts during construction and operation in the air quality analysis.<sup>7</sup> However, there is no determination of emissions or related

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<sup>1</sup> IS/MND, p. 1.

<sup>2</sup> *Ibid.*

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

<sup>4</sup> *Ibid.*

<sup>5</sup> *Ibid.*

<sup>6</sup> *Ibid.* p. 22.

<sup>7</sup> *Ibid.* p. 22-23.

analyses addressing the localized air quality significance impacts using the localized significant thresholds (LSTs) for construction and operation.

In addition, pursuant to CEQA guidelines section 15064 - Determining the Significance of the Environmental Effects Caused by a project – the Lead Agency is responsible for performing an in-depth and detailed analysis of an estimation of the potential air quality impact arising from the construction and operation of the Proposed Project. Therefore, South Coast AQMD staff recommends that the Lead Agency revise the air quality analysis section to include:

- 1) Estimated the maximum daily on-site construction emissions using CalEEMod<sup>8</sup> land use emissions software, and subsequently, compare these emissions against the South Coast AQMD LSTs.
- 2) Quantify criteria pollutant emissions and GHG emissions using CalEEMod land use emissions software and compare the emissions to South Coast AQMD's CEQA regional pollutant emissions significant thresholds.<sup>9</sup>
- 3) Estimated the maximum daily on-site operational emissions using CalEEMod land use emissions software and, subsequently, compare these emissions against the South Coast AQMD LSTs.

It is important to note that the localized analysis can be conducted either by using the LST screening tables or by performing dispersion modeling. This analysis will provide us with a preliminary assessment of the potential air quality impacts, both at the regional and localized levels, arising from the Proposed Project.

#### *Health Risk Assessment (HRA) during Project Operation*

Section III. Air Quality of the IS/MND includes the HRA analysis to estimate the Proposed Project's maximum cancer risk on the nearest sensitive receptors. The HRA analysis concludes that the cumulative cancer risk for the 30-year is 9.64 in a million.<sup>10</sup>

Due to the significantly high cancer risk result of close to 10 in a million, Staff recommends that the Lead Agency make a good-faith effort to include all the feasible and applicable mitigation measures to reduce the high cancer risk impact on the nearby residents. Examples of mitigation measures such as requiring cleaner trucks or reducing the number of truck trips travel to and from the Proposed Project site, etc. Thus, these feasible mitigation measures should be included in the Final MND.

#### 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 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

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<sup>8</sup> CalEEMod is available free of charge at [www.caleemod.com](http://www.caleemod.com).

<sup>9</sup> South Coast AQMD's CEQA regional pollutant emissions significance thresholds available at <https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf>

<sup>10</sup> *Ibid.* p. 24.

to approving the Proposed Project, the Lead Agency shall consider the 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 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 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 Danica Nguyen, Air Quality Specialist, at [dnguyen1@aqmd.gov](mailto:dnguyen1@aqmd.gov) should you have any questions.

Sincerely,

*Sam Wang*

Program Supervisor, CEQA IGR

Planning, Rule Development & Implementation

SW:DN

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