



South Coast Air Quality Management District

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E-MAILED: June 10, 2011

June 10, 2011

Mr. Allan Penaflorida, Assistant Planner APenaflorida@lomalinda-ca.gov
City of Loma Linda
Community Development Department
25541 Barton Road
Loma Linda, CA 92354

Draft Mitigated Negative Declaration (Draft MND) **for the Proposed Center Point 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 Mitigated Negative Declaration.

In the Draft MND, the lead agency proposes to divide a 7.7 acre parcel into seven individual lots to construct a new business center. The proposed project would include approximately 73,000 square feet of total building area divided into four pads. AQMD staff is concerned about potential localized air quality impacts from construction activities to sensitive receptors (i.e., residences) located directly south of the project. Therefore, AQMD staff recommends that the lead agency perform a localized significance analysis by either using the localized significance thresholds (LSTs) developed by the AQMD or performing dispersion modeling as necessary. Since the lead agency estimated regional construction grading emissions based on a maximum daily acreage disturbed of 1.92 acres, the lead agency could use the AQMD LST lookup tables¹ providing that a mitigation measure be adopted consistent with the 1.92 acre limit. In the event that the lead agency finds any significant localized air quality impacts from the proposed project the lead agency should consider all feasible mitigation measures² to reduce the project's air quality impacts.

Please provide the AQMD 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 air quality 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.

¹ <http://www.aqmd.gov/ceqa/handbook/LST/LST.htm>

² www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html

Mr. Allan Penaflorida,
Assistant Planner

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June 10, 2011

Sincerely,

A handwritten signature in black ink that reads "Ian V. MacMillan". The signature is written in a cursive style with a large, stylized initial "I".

Ian MacMillan
Program Supervisor, Inter-Governmental Review
Planning, Rule Development & Area Sources

Attachment

IM:GM

SBC110524-02
Control Number