



South Coast Air Quality Management District

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E-Mailed: December 11, 2012
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Mr. James Jenkins
Department of Airports
777 East Rialto Avenue
San Bernardino, CA 92415-0831

Review of the Draft Negative Declaration for the Chino Airport Master Plan Update Project

The South Coast Air Quality Management District (AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are intended to provide guidance to the lead agency and should be incorporated into the final environmental document as appropriate.

Based on a review of the Draft Negative Declaration (ND) the lead agency has not fully disclosed the project's operational emissions thereby lacking sufficient information to substantiate the Draft ND's significance determination. Therefore, the AQMD staff recommends that the lead agency provide additional air quality data in the final environmental document including daily aircraft activity, aircraft emissions factors, airport operational equipment specifications, studies, references and any other information necessary to demonstrate the project's operational air quality impacts. Further, the AQMD staff is concerned about the potential health risk impacts from future airport activity to residential land uses adjacent to the project site (south of the project site). Therefore, the AQMD staff recommends that the lead agency analyze the potential health risk impacts from the proposed project and provide additional data to substantiate the air quality and greenhouse gas (GHG) significance determination in the final environmental document. Details regarding these comments are attached to this letter.

Please provide the AQMD with written responses to all comments contained herein prior to the adoption of the final environmental document. Further, staff is available to work with the lead agency to address these issues and any other questions that may arise. Please

contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,

A handwritten signature in black ink that reads "Ian V. MacMillan". The signature is written in a cursive style with a distinct loop for the letter 'M'.

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

Attachment

IM:DG

SBC121031-08
Control Number

1. Operational Emissions (Criteria and GHG's)

The lead agency provides annual operational emissions values for an interim (2015) plan date, however, the lead agency does not identify the project's peak daily operational emissions (criteria pollutants and GHG's). As a result, it is not clear the 2015 emissions values capture the project's peak daily activity based on capacity of the project site. Further, the lead agency does not provide any supporting data or reference material to demonstrate that the operational emissions impacts identified in the Draft ND properly account for the difference between existing operational activity levels at the project site and the estimated future capacity of the proposed project. As a result, it does not appear that the Draft ND substantiates the lead agency's significance determination. Therefore, AQMD staff recommends that the lead agency provide sufficient air quality data in the final environmental document including, daily aircraft activity, aircraft emission factors, equipment specifications, studies, references, data and any other information necessary to demonstrate the project's impacts. The Final ND should have sufficient detail for AQMD staff and the public to conclude that air quality impacts are adequately evaluated and disclosed.

Health Risk Assessment

2. The AQMD staff is concerned about the potential health risk impacts to sensitive land uses adjacent (south) to the project site from future airport activity at the project site. For example, the Development Plan Concept Map (Figure 4) depicts a variety of new aeronautical uses placed adjacent to sensitive land uses (i.e., residential units) along Kimball Avenue. Also, the plan does not limit flight activity at the project site but identifies a site capacity of over 300,000 flights annually (nearly double existing activity). Therefore, the lead agency should analyze the potential health risk impacts to sensitive land uses from future airport emissions sources (including air craft emissions, airport equipment emissions) and, if applicable, include additional mitigation measures to reduce significant impacts to the extent feasible. Further, the lead agency should quantify and disclose the potential lead impacts from combustion of leaded fuels from the proposed project.