



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178

(909) 396-2000 • www.aqmd.gov

E-Mailed: July 29, 2014  
tom.pace@sbcusd.k12.ca.us

July 29, 2014

Mr. Tom Pace, Project Manager  
San Bernardino City Unified School District  
956 W. 9<sup>th</sup> Street  
San Bernardino, CA 92411

## **Review of the Draft Environmental Impact (Draft EIR) for the Proposed Indian Springs High School Athletic Facilities Improvements Project**

The South Coast Air Quality Management District (SCAQMD) staff 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 Environmental Impact Report (EIR) as appropriate.

Based on a review of the Draft EIR the Lead Agency relies on Mitigation Measure AQ-1 (MM AQ-1) to reduce the project's significant localized construction air quality impacts to a less than significant level. However, MM AQ-1 permits the use of on-site construction equipment that does not meet or/exceed Tier 3 emissions standards if the equipment remains at the project site for 5 days or less. As a result, the SCAQMD staff is concerned that the project could exceed the SCAQMD CEQA Localized Construction Significance Thresholds (i.e., peak daily emissions values) within the five (5) day window provided by MM AQ-1. Therefore, to ensure less than significant air quality impacts the SCAQMD staff recommends that the Lead Agency replace MM AQ-1 as follows:

- All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 3 offroad emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

Pursuant to Public Resources Code Section 21092.5, SCAQMD staff requests that the Lead Agency provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final EIR.

Contact Information

SCAQMD 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 cursive script that reads "Ed Eckerle".

Ed Eckerle  
Program Supervisor  
Planning, Rule Development & Area Sources

EE:DG

SBC140613-04  
Control Number