



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:

August 31, 2023

JAguilo@ontarioca.gov

Jeanie Irene Aguilo, Associate Planner
City of Ontario Planning Department
303 East B Street
Ontario, CA 91764

Notice of Availability of a Draft Subsequent Environmental Impact Report (SEIR) for the PSPA21-005, Subarea 29 Specific Plan Amendment Project (Proposed Project)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The City of Ontario is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. The following comments include additional recommended air quality mitigation measures for construction and information about South Coast AQMD rules and permits that the Lead Agency should include in the Final SEIR.

South Coast AQMD Staff's Summary of Project Information in the Draft SEIR

Based on the Draft SEIR, the Lead Agency proposes construction of 1,470 residential units on 151.1 acres.¹ The project is located on the southeast corner of Eucalyptus Avenue and Haven Avenue.² The Proposed Project's construction would last approximately 48 months, in the beginning of February 2023 to the completion which is expected in July 2025.³

South Coast AQMD Staff's Comments

Air Quality Mitigation Measures for NO_x and PM emissions from construction

Based on the Air Quality Section of the Draft SEIR, it is evident that the construction activities associated with the Proposed Project are expected to have significant air quality impact on NO_x emissions before implementing mitigation measures.⁴ Given the project's scope, it is crucial to ensure that the levels of construction emissions, particularly NO_x and PM₁₀, remain below significant thresholds during the 48-months of construction period. An effective approach to achieve this goal, when feasible, is opting for electric emission-free engines instead of diesel-fueled ones for the construction equipment. This proactive choice not only aligns with environmental concerns but also demonstrates a commitment to minimizing the project's environmental footprints. To mitigate NO_x emissions, the Proposed Project should consider promoting greener construction practices, such as limiting the older engines use in favor of latest available advanced technologies or choosing to retrofit some to cutting-edge cleaner exhaust aftertreatment techniques. Additionally, the South Coast AQMD's CEQA Air Quality

¹ Draft SEIR, p. 16.

² Ibid.

³ Ibid. p. 23.

⁴ Ibid. p. 187.

Handbook⁵ offer resources to help the Lead Agency identify additional potential mitigation measures for the Proposed Project for both operational and construction emissions.

South Coast AQMD Permits and Responsible Agency

If the implementation of the Proposed Project would require the use of new stationary equipment (e.g., internal combustion engines), permits from South Coast AQMD are required. The Final SEIR should include a discussion on any existing and new stationary equipment requiring South Coast AQMD permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project. Any assumptions used for the stationary sources in the Final SEIR will also be used as the basis for the permit conditions and limits for the Proposed Project. Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions on permits. For more general information on permits, please visit South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>.

Conclusion

According to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the Draft SEIR for adoption together with any comments received during the public review process. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final SEIR. When the Lead Agency's position is at variance with recommendations raised in the comments, the issues raised in the comments should be addressed in detail, giving reasons why specific comments and suggestions are not accepted. There should be good faith and reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision-makers and the public who are interested in the Proposed Project.

We appreciate the opportunity to review the Proposed Project. Thank you for considering these 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 Sahar Ghadimi, Air Quality Specialist, at sghadimi@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

Sam Wang

Program Supervisor, CEQA IGR

Planning, Rule Development & Implementation

SW:SG

SBC230719-10

Control Number

⁵<http://www.aqmd.gov/docs/default-source/ceqa/handbook/capcoa-quantifying-greenhouse-gas-mitigation-measures.pdf>