



# South Coast Air Quality Management District

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

SENT VIA E-MAIL:

October 20, 2022

Salvador Quintanilla, Associate Planner  
[squintanilla@fontana.org](mailto:squintanilla@fontana.org)  
City of Fontana, Planning Department  
8353 Sierra Avenue  
Fontana, CA 92335

**Mitigated Negative Declaration (MND) for the Proposed  
Courtplace at Fontana Project (Proposed Project)  
Design Review No. 20-034 (Master Case No. 20-094)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The City of Fontana is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. The following comments include recommended revisions to the CEQA regional air quality impacts analysis for construction and operation overlapping activities and information about South Coast AQMD permits and responsible agency that the Lead Agency should incorporate in the Final MND.

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

Based on the MND, the Lead Agency proposes modifying the two existing parcels to allow for two-phased affordable housing, including multi-level residential apartment buildings for a total of 106 units associated with green space, community gathering areas, vehicle parking, landscaping, and security fencing on the approximately 4.8-acres of land.<sup>1</sup> The Proposed Project is developed into two phases; Phase I is anticipated to begin in the second half of 2023 and be completed in the first quarter of 2025, while Phase II is anticipated to begin in the second half of 2024 and be completed in the first quarter of 2026.<sup>2</sup> The Proposed Project is located at 11196 Sierra Avenue, Fontana.<sup>3</sup> Based on a review of aerial photographs, South Coast AQMD staff found that the nearest sensitive receptor (e.g., residence) is within 50 feet south of the Proposed Project. The duration of construction activities associated with Phase I and II is conservatively anticipated to take a total of 28 months; however, the construction timing will likely be longer, which is approximately 35 months.<sup>4</sup>

---

<sup>1</sup> MND. Page 5.

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

<sup>3</sup> *Ibid.* Page 4.

<sup>4</sup> *Ibid.* Page 53.

South Coast AQMD Staff's Comments*CEQA Regional Air Quality Impacts Analysis for Construction and Operation Overlapping Activities*

Based on the construction timing provided in the MND<sup>5</sup>, the Proposed Project would have an overlapping between construction and operation activities between Phase I and Phase II. Emissions from overlapping construction and operation activities should be combined and compared to South Coast AQMD's regional air quality CEQA operational thresholds to determine the level of significance. However, the Lead Agency only includes the regional and localized air quality impacts from the Project's construction and operation activities but not the overlapped air quality impacts analysis in the MND. South Coast AQMD staff recommends that the Lead Agency revise the air quality impacts analysis, including the overlapped emissions from construction and operation activities, and compare it to South Coast AQMD's regional air quality CEQA operational thresholds to determine the Proposed Project's level of significance in the Final MND. In the event that the overlapped emissions exceed the South Coast AQMD's regional air quality CEQA operational thresholds, the Lead Agency should provide and discuss the mitigation measures to reduce the overlapped emissions in the Final MND. If the overlapped air quality impacts analysis is not included in the Final MND, the Lead Agency should provide reasons for not having them supported by substantial evidence in the record.

*South Coast AQMD Permits and Responsible Agency*

If the implementation of the Proposed Project would require modifying the existing or use of new stationary equipment, including but not limited to emergency generators, fire/water pumps, etc., permits from South Coast AQMD are required. Stationary equipment not only requires permits to construct but also permits to operate. Therefore, the Lead Agency should include a discussion on stationary equipment, which would be utilized in the Proposed Project's construction and operation, requiring South Coast AQMD permits and identifying South Coast AQMD as a Responsible Agency for the Proposed Project in the Final MND. Any assumptions used for the stationary sources in the Final MND 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 MND 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 MND. 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

---

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

are not meaningful, informative, or useful to decision-makers and the public who are interested in the Proposed Project.

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*

Sam Wang

Program Supervisor, CEQA-IGR

Planning, Rule Development, and Implementation

SW:DN

SBC221011-11

Control Number