



# South Coast Air Quality Management District

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SENT VIA E-MAIL:

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**Draft Subsequent Environmental Impact Report (SEIR) for the Proposed  
The Ontario Plan 2050 Policy Plan Amendment (Proposed Project)  
(SCH No.: 2025110102)**

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. To provide context, South Coast AQMD staff have provided a brief summary of the project information and prepared the following comments, organized by topic of concern.

**Summary of Project Information in the Draft SEIR**

Based on the Draft SEIR, the Proposed Project consists of two primary components: The Ontario Plan (TOP) Policy Plan Amendment (PPA) and the Eucalyptus Business Park Specific Plan (EBPSP).

The PPA component would modify the existing and planned land use pattern within the TOP area, encompassing more than 1,300 acres in the southern portion of the City of Ontario.<sup>1</sup> In addition, the PPA includes updates to the City's designated truck route network to ensure consistency with Assembly Bill 98 (AB 98).<sup>2</sup> Specifically, two roadway segments would be removed from, and three segments added to, the City's official truck route system.<sup>3</sup>

The EBPSP component would establish a specific plan over approximately 189 acres, consisting of nine Planning Areas (PAs).<sup>4</sup> Land uses would include approximately 137.9 acres designated for Business Park uses, 36.15 acres for Open Space–Parkland, and 14.97 acres for roadway and circulation improvements.<sup>5</sup> Development within PAs 1 through 6 would accommodate up to approximately 2,939,000 square feet (sf) of industrial/business park uses. Individual building sizes would not exceed 560,000 sf, and cold storage uses would be prohibited.<sup>6</sup> PAs 7 through 9 would be developed as Open Space–Parkland.<sup>7</sup> Additionally, the Specific Plan allows for the potential development of a 35,000 sf publicly operated animal resource center, should the City elect to

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<sup>1</sup> Draft SEIR. p. 2-17.

<sup>2</sup> *Ibid.* p. 2-20.

<sup>3</sup> *Ibid.* p. 2-54.

<sup>4</sup> *Ibid.* p. 2-20.

<sup>5</sup> *Ibid.* p. 2.49.

<sup>6</sup> *Ibid.* p. 2-50.

<sup>7</sup> *Ibid.* p. 2-53.

include it in the Specific Plan areas.<sup>8</sup> The EBPSP site is generally bounded by Campus Avenue to the west, Eucalyptus Avenue to the south, and Walker Avenue to the east.<sup>9</sup> Based on a review of aerial imagery, the nearest sensitive receptor is located approximately 100 feet north of the EBPSP site.

The EBPSP construction is anticipated to commence in January 2027 and continue through June 2031,<sup>10</sup> and would occur in three phases,<sup>11</sup> with the details<sup>12</sup> as follows:

- Phase 1 (2028)
  - 340,700 sf industrial park
  - 553,300 sf warehousing
  - 326,200 sf high-cube fulfillment center (sort)
  - 33.8-acre park
- Phase 2 (2029)
  - 273,700 sf industrial park
  - 553,300 sf warehousing
  - 261,000 sf high-cube fulfillment center (sort)
  - 5,000 sf retail
  - 5,000 sf fast-food restaurant with drive-thru
  - 35,000 sf public animal shelter
  - 37.7-acre park
- Phase 3 (2031)
  - 162,600 sf industrial park
  - 211,700 sf manufacturing
  - 163,600 sf warehousing
  - 47,900 sf high-cube fulfillment center (sort)
  - 21-acre park

### South Coast AQMD Comments

#### *Truck Idling Duration and Emissions Modeling*

Appendix C4 (EBPSP HRA) of the Draft SEIR evaluates truck emissions with 15 minutes of idling per truck per day to estimate diesel particulate matter (DPM) emissions for the health risk assessment (HRA).<sup>13</sup> However, the actual idling times may be longer in duration since the EBPSP is anticipated to involve a total of 1,218 two-way truck trips per day.<sup>14</sup> Moreover, it is reasonable to expect that individual trucks may experience extended periods of idling due to on-site queuing, security checks, staging, loading, and unloading operations, among other factors, particularly during peak hours or in congested circulation areas. As such, a 15-minute idling duration may underestimate actual on-site idling behavior and, consequently, DPM emissions, which are a key contributor to localized health risks.

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<sup>8</sup> *Ibid.*

<sup>9</sup> *Ibid.* p. 2-54.

<sup>10</sup> *Ibid.* p. 2-75.

<sup>11</sup> *Ibid.* p. 2-77.

<sup>12</sup> Appendix C3: EBPSP AQ Study. p. C3-17.

<sup>13</sup> Appendix C4: EBPSP HRA. p. C4-19.

<sup>14</sup> Appendix C4: EBPSP HRA. p. C4-20.

While the California Air Resources Board (CARB) limits diesel truck idling to five minutes as set forth in the Airborne Toxic Control Measure (ATCM), an exemption from this requirement is allowed for trucks equipped with engines that meet the optional low-NOx idle emission standard, which is typically applicable to model year 2008 and newer trucks. These vehicles, often referred to as “clean idle” certified, are permitted to idle longer than five minutes when situated more than 100 feet from sensitive land uses such as homes and schools.<sup>15</sup> Furthermore, CARB’s EMFAC2021 Volume III Technical Document (Table 4.4.2-5) indicates that heavy-duty trucks may idle for up to five hours at a single location under certain conditions.<sup>16</sup> For these aforementioned reasons, as a practical matter, the idling duration for onsite heavy-duty trucks visiting the Proposed Project site could idle for a much longer duration than what was analyzed in the Draft EIR. Thus, the HRA may have substantially underestimated the full extent of operational health risks associated with the DPM emissions from the anticipated onsite heavy-duty truck activities.

Accurate characterization of idling activity is essential to fully assess the potential health risk impacts, particularly for nearby sensitive receptors. Therefore, to ensure the HRA provides an accurate and health-protective estimate of potential exposure, the Lead Agency is recommended to either: 1) revise the operational emissions modeling in the Final SEIR to assume a minimum of 30 minutes of idling per truck per day, unless site-specific data or operational constraints justify a shorter duration; or 2) provide empirical evidence, such as facility-specific queuing and processing time studies, vehicle circulation modeling, or comparable industry data, to substantiate the 15-minute assumption as representative of expected operations of the Proposed Project.

#### *Completion of the Overlapped Emissions Analysis*

Appendix C3 (EBPSP Air Quality Study) of the Draft SEIR includes a discussion of the temporal overlap between construction and operational activities.<sup>17</sup> However, the analysis presents combined emissions without a corresponding determination of significance.<sup>18</sup> While the South Coast AQMD has not established specific thresholds of significance for overlapping construction and operational emissions, a standard practice is to conservatively compare the combined (overlapping) emissions to the applicable operational significance thresholds to evaluate potential impacts. Therefore, the Lead Agency is recommended to revise the air quality analysis to include a determination for overlapping construction and operational emissions using South Coast AQMD’s air quality *operational* significance thresholds. Where exceedances of applicable thresholds are identified, the analysis should identify, evaluate, and incorporate all available and feasible mitigation measures to reduce emissions to the maximum extent practicable. Such measures may include, but are not limited to, enhanced equipment emissions controls, construction scheduling refinements to minimize overlap, and increased reliance on zero- and near-zero

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<sup>15</sup> CARB, Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling was promulgated in Chapter 13 of the California Code of Regulations, Section 2485: Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling, available at [https://ww2.arb.ca.gov/sites/default/files/2022-06/13\\_CCR\\_2485\\_OAL\\_06222022-2\\_ADA\\_06272022\\_0.pdf](https://ww2.arb.ca.gov/sites/default/files/2022-06/13_CCR_2485_OAL_06222022-2_ADA_06272022_0.pdf)

<sup>16</sup> CARB, EMFAC2021 Volume III Technical Document, Table 4.4.2-5, p. 161., available at [https://ww2.arb.ca.gov/sites/default/files/2021-03/emfac2021\\_volume\\_3\\_technical\\_document.pdf](https://ww2.arb.ca.gov/sites/default/files/2021-03/emfac2021_volume_3_technical_document.pdf)

<sup>17</sup> Appendix C3: EBPSP AQ Study. p. C3-65.

<sup>18</sup> Appendix C3: EBPSP AQ Study. p. C3-926.

emission technologies. The revised analysis and conclusions should be included in the Final SEIR to ensure a complete and transparent assessment of potential air quality impacts.

### *Recommend Conducting a Quantitative Analysis of Human Health Consequences*

Section 3.3 (Air Quality) of the Draft SEIR states that the health impacts or human health consequences analysis is not conducted.<sup>19</sup> The health impacts are acknowledged; however, the Lead Agency relies on infeasibility arguments to conclude that the quantification of the health effects analysis is not provided in the Draft SEIR. However, the February 2023 Friant Community Plan Update and Friant Ranch Specific Plan contained a detailed quantitative analysis of Human Health Consequences Analysis,<sup>20</sup> which is evidence that this type of calculation can be performed.

For context, the Bloomington Business Park Specific Plan Project<sup>21</sup> was required to recirculate its Draft EIR following a legal challenge in San Bernardino County Superior Court (Case No. CIVSB2228456). In that proceeding, the court directed the County to set aside its prior approvals, finding that the EIR was legally inadequate with respect to its analysis of air quality impacts, including the application of the Friant Ranch methodology for evaluating health effects. As articulated in the court's ruling, "*a sufficient discussion of significant impacts requires not merely a determination of whether an impact is significant, but some effort to explain the nature and magnitude of the impact.*"<sup>22</sup> This standard underscores the requirement under the CEQA that an EIR provide a meaningful, evidence-based analysis that allows decision-makers and the public to understand the extent and severity of a project's environmental and public health impacts.

Therefore, the Lead Agency is recommended to review the analysis in the above-referenced document, perform a quantitative analysis specific to the Proposed Project, and incorporate the results in the Final SEIR.

### *Recommended Air Quality Mitigation Measures to Reduce Construction Emissions*

Section 3.3 (Air Quality) of the Draft SEIR evaluates emissions associated with construction activities of the EBSP and concludes that construction-related impacts would be less than significant; therefore, no mitigation measures are proposed.<sup>23</sup> Notwithstanding this determination, the Lead Agency is recommended to incorporate all feasible and available best management practices to further minimize criteria pollutants and precursor emissions to the maximum extent practicable.

Furthermore, given the extent, scale, and duration of the Proposed Project, the Lead Agency is recommended to evaluate the applicability of the statewide clean-fleet and clean-construction programs under development by the California Air Resources Board (CARB). These programs provide a framework for achieving substantial near-term reductions in nitrogen oxide (NOx),

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<sup>19</sup> *Ibid.* p. 3.3-73.

<sup>20</sup> Quantitative Analysis of Human Health Consequences Analysis, Table 3.3-8. Available at: [https://www.fresnocountyca.gov/files/sharedassets/county/v/1/vision-files/files/72347-friant-prr-deir\\_2-7-23.pdf](https://www.fresnocountyca.gov/files/sharedassets/county/v/1/vision-files/files/72347-friant-prr-deir_2-7-23.pdf)

<sup>21</sup> Bloomington Business Park Specific Plan Project (SCH: 2020120545). Available at <https://ceqanet.lci.ca.gov/2020120545/10>

<sup>22</sup> Bloomington Business Park Specific Plan Project. Court Ruling. p. 34 of PDF. Available at [https://www.climatecasechart.com/documents/california-superior-court-found-that-ceqa-review-for-industrial-rezoning-improperly-analyzed-greenhouse-gas-reduction-measures\\_4d86](https://www.climatecasechart.com/documents/california-superior-court-found-that-ceqa-review-for-industrial-rezoning-improperly-analyzed-greenhouse-gas-reduction-measures_4d86)

<sup>23</sup> *Ibid.* p. 3.3-56.

VOC, and DPM emissions from on- and off-road fleets, which are the key precursors to the formation of ozone, which have associated adverse health impacts. Taking full advantage of these programs would provide additional opportunities to minimize the significant effects of the Proposed Project. CARB's California Clean Construction Program is designed to recognize and encourage off-road construction fleets that voluntarily exceed regulatory requirements by deploying cleaner-than-Tier 4 Final or zero-emission off-road equipment.<sup>24</sup> Similarly, CARB's Clean Fleet Connect<sup>25</sup> and Advanced Clean Fleets (ACF) programs support on-road fleet transitions toward zero-emission technologies.<sup>26</sup> These frameworks demonstrate that both construction and operational fleets can achieve meaningful emissions reductions through the adoption of newer, cleaner equipment and zero-emission technologies.

In addition to the use of the cleanest available construction technologies (e.g., Tier 4 Final engines), renewable diesel fuel, super-compliant low-volatile organic compound (VOC) architectural coatings, and zero-emission (fully electric) equipment where feasible, the Lead Agency is recommended to consider implementing enhanced fugitive dust control measures (e.g., increased watering frequency, application of soil stabilizers, and minimizing disturbed areas), idling restrictions for on-road and off-road equipment, and optimized construction phasing and scheduling to reduce equipment overlap and associated emissions. Further measures may include the establishment of designated construction haul routes to minimize exposure to sensitive receptors and the preparation of a construction emissions management plan to ensure effective implementation and monitoring of these practices.

Incorporation of these mitigation measures would further reduce short-term air quality impacts and potential localized health risks, particularly in proximity to sensitive receptors. These additional mitigation measures should be evaluated, disclosed, and incorporated, as appropriate, in the Final SEIR to demonstrate the Lead Agency's commitment to minimizing air quality impacts beyond the identified level of significance.

*Recommended Air Quality and Greenhouse Gas Mitigation Measures and Project Design Features for Consideration*

CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse air quality impacts. To further reduce the Proposed Project's air quality impacts, the following mitigation measures and project design considerations are recommended to be incorporated into the Final SEIR.

Mitigation Measures to Reduce Operational Air Quality Impacts from Mobile Sources

1. Require ZE or NZE on-road haul trucks, such as heavy-duty trucks with natural gas engines that meet the CARB's adopted optional NO<sub>x</sub> emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr), if and when feasible.

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<sup>24</sup> CARB – California Clean Construction Program. Available at: <https://ww2.arb.ca.gov/our-work/programs/california-clean-construction-program>.

<sup>25</sup> CARB – Clean Fleet Connect. Available at: <https://ww2.arb.ca.gov/our-work/programs/clean-fleet-connect>.

<sup>26</sup> CARB – Advanced Clean Fleets Program. Available at: <https://ww2.arb.ca.gov/our-work/programs/advanced-clean-fleets>.

*Note: Given CARB's clean truck rules and regulations aiming to accelerate the utilization and market penetration of ZE and NZE trucks, such as the Advanced Clean Trucks Rule and the Heavy-duty Low NOx Omnibus Regulation, ZE and NZE trucks will become increasingly more available for use.*

2. Require a phase-in schedule to incentivize the use of cleaner operating trucks to reduce any significant adverse air quality impacts.

*Note: South Coast AQMD staff are available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency.*

3. Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the Final EIR. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the Proposed Project through CEQA prior to allowing this higher activity level.
4. Provide electric vehicle (EV) charging stations or, at a minimum, provide electrical infrastructure, and electrical panels should be appropriately sized. Electrical hookups should be provided for truckers to plug in any onboard auxiliary equipment.

#### Mitigation Measures to Reduce Operational Air Quality Impacts from Other Area Sources

1. Maximize the use of solar energy by installing solar energy arrays.
2. Use light-colored paving and roofing materials.
3. Utilize only Energy Star heating, cooling, and lighting devices and appliances.

#### Design Considerations for Reducing Air Quality and Health Risk Impacts

1. Clearly mark truck routes with trailblazer signs so that trucks will not travel next to or near sensitive land uses (e.g., residences, schools, daycare centers, etc.).
2. Design the Proposed Project such that truck entrances and exits are not facing sensitive receptors, and trucks will not travel past sensitive land uses to enter or leave the Proposed Project site.
3. Design the Proposed Project such that any truck check-in point is inside the Proposed Project site to ensure no trucks are queuing outside.
4. Design the Proposed Project to ensure that truck traffic inside the Proposed Project site is as far away as feasible from sensitive receptors.
5. Restrict overnight truck parking in sensitive land uses by providing overnight truck parking inside the Proposed Project site.

Lastly, the South Coast AQMD also suggests that the Lead Agency conduct a review of the following references and incorporate additional mitigation measures as applicable to the Proposed Project in the Final EIR:

1. State of California – Department of Justice: Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act<sup>27</sup>
2. South Coast AQMD 2022 Air Quality Management Plan,<sup>28</sup> specifically:
  - a) Appendix IV-A – South Coast AQMD’s Stationary and Mobile Source Control Measures
  - b) Appendix IV-B – CARB’s Strategy for South Coast
  - c) Appendix IV-C – SCAG’s Regional Transportation Strategy and Control Measure
3. United States Environmental Protection Agency (U.S. EPA) Transportation, Air Quality, and Climate Change.<sup>29</sup>

*Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program*

On May 7, 2021, South Coast AQMD’s Governing Board adopted Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program,<sup>30</sup> and Rule 316 – Fees for Rule 2305.<sup>31</sup> Rules 2305 and 316 are new rules that will reduce regional and local emissions of NOx and particulate matter (PM), including DPM. These emission reductions will reduce public health impacts for communities located near warehouses from mobile sources that are associated with warehouse activities. Also, the emission reductions will help the region attain federal and state ambient air quality standards. Rule 2305 applies to owners and operators of warehouses greater than or equal to 100,000 sf. Under Rule 2305, operators are subject to an annual WAIRE Points Compliance Obligation that is calculated based on the annual number of truck trips to the warehouse. WAIRE Points can be earned by implementing actions in a prescribed menu in Rule 2305, implementing a site-specific custom plan, or paying a mitigation fee. Warehouse owners are only required to submit limited information reports, but they can opt to earn Points on behalf of their tenants if they choose, because certain actions to reduce emissions may be better achieved at the warehouse development phase, for instance, the installation of solar and charging infrastructure. Rule 316 is a companion fee rule for Rule 2305 to allow South Coast AQMD to recover costs associated with Rule 2305 compliance activities. Since the Proposed Project consists of the development of up to 2,939,000 sf of warehouses, fulfillment centers, industrial park uses, etc., the Proposed Project’s warehouse owners and operators will be required to comply with Rule 2305 once the warehouse is occupied. Therefore, South Coast AQMD staff

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<sup>27</sup> State of California – Department of Justice, Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act available at <https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf>

<sup>28</sup> South Coast AQMD, 2022 Air Quality Management Plan (AQMP) available at <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan>

<sup>29</sup> United States Environmental Protection Agency (U.S. EPA) Transportation, Air Quality, and Climate Change available at <https://www.epa.gov/transportation-air-pollution-and-climate-change>

<sup>30</sup> South Coast AQMD Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program available at <http://www.aqmd.gov/docs/default-source/rule-book/reg-xxiii/r2305.pdf>.

<sup>31</sup> South Coast AQMD Rule 316 – Fees for Rule 2305 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-iii/r316.pdf>

recommends that the Lead Agency review South Coast AQMD Rule 2305 to determine the potential WAIRE Points Compliance Obligation for future operators and explore whether additional project requirements and CEQA mitigation measures can be identified and implemented at the Proposed Project that may help future warehouse operators meet their compliance obligation. South Coast AQMD staff is available to answer questions concerning Rule 2305 implementation and compliance by phone or email at (909) 396-3140 or [waire-program@aqmd.gov](mailto:waire-program@aqmd.gov). For implementation of guidance documents and compliance and reporting tools, please visit South Coast AQMD's WAIRE Program webpage.<sup>32</sup>

### *South Coast AQMD Air Permits and Role as a Responsible Agency*

Appendix C3 (EBPSP AQ Study) of the Draft SEIR states that the Proposed Project would include a total of two emergency fire pumps in Phase 1, four emergency fire pumps in Phase 2, and five emergency fire pumps in Phase 3.<sup>33</sup> Thus, air permits from South Coast AQMD will be required. The Final SEIR should include a discussion about the South Coast AQMD rules that may be applicable to the Proposed Project. Those rules may include, for example, Rule 201 – Permit to Construct,<sup>34</sup> Rule 203 – Permit to Operate,<sup>35</sup> Rule 401 – Visible Emissions,<sup>36</sup> Rule 402 – Nuisance,<sup>37</sup> Rule 403 – Fugitive Dust,<sup>38</sup> Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,<sup>39</sup> Rule 1113 – Architectural Coatings,<sup>40</sup> and Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines,<sup>41</sup> etc.

It is important to note that if air permits from the South Coast AQMD are required, South Coast AQMD's role under CEQA will become the Responsible Agency of the Proposed Project. Per CEQA Guidelines Section 15086, the Lead Agency is required to consult with South Coast AQMD. CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of the process for conducting a review of the Proposed Project and issuing discretionary approvals. Also, as set forth in CEQA Guidelines Section 15096(h), the Responsible Agency is required to make Findings in accordance with CEQA Guidelines Section 15091 for each significant effect of the project and issue a Statement of Overriding Considerations in accordance with CEQA Guidelines Section 15093, if necessary. Lastly, as set forth in CEQA Guidelines Section 15096(i), the Responsible Agency may file a Notice of Determination.

CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of the process for conducting a review of the Proposed Project and issuing discretionary approvals. Moreover, it is important to note that if a Responsible Agency determines that a CEQA document is not adequate to rely upon for its discretionary approvals, the Responsible Agency must take further actions listed in CEQA Guideline Section 15096(e), which could have the effect of delaying the

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<sup>32</sup> South Coast AQMD WAIRE Program available at <http://www.aqmd.gov/waire>.

<sup>33</sup> Appendix C3: EBPSP AQ Study. p. C3-59.

<sup>34</sup> South Coast AQMD, Rule 201 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>

<sup>35</sup> South Coast AQMD, Rule 203 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>

<sup>36</sup> South Coast AQMD, Rule 401 available at <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf>

<sup>37</sup> South Coast AQMD, Rule 402 available at <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>

<sup>38</sup> South Coast AQMD, Rule 403 available at <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403>

<sup>39</sup> South Coast AQMD, Rule 1110.2 available at [https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110\\_2.pdf](https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf)

<sup>40</sup> South Coast AQMD, Rule 1113 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf>

<sup>41</sup> South Coast AQMD, Rule 1470 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf>

implementation of the Proposed Project. In its role as CEQA Responsible Agency, the South Coast AQMD is obligated to ensure that the CEQA document prepared for this Proposed Project contains a sufficient project description and analysis to be relied upon in order to issue any discretionary approvals that may be needed for air permits.

For these reasons, the final CEQA document should be revised to include a discussion about any and all new stationary and portable equipment requiring South Coast AQMD air permits, provide the evaluation of their air quality and greenhouse gas impacts, and identify South Coast AQMD as a Responsible Agency for the Proposed Project as this information will be relied upon as the basis for the permit conditions and emission limits for the air permit(s). Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions regarding what types of equipment would require air permits. For more general information on permits, please visit South Coast AQMD's webpage at <https://www.aqmd.gov/home/permits>.

### Conclusion

As set forth in Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), the Lead Agency shall evaluate comments from public agencies on environmental issues and prepare a written response at least 10 days prior to certifying the Final SEIR. As such, please provide South Coast AQMD written responses to all comments contained herein at least 10 days prior to the certification of the Final SEIR. In addition, as provided by CEQA Guidelines Section 15088(c), if the Lead Agency's position is at variance with recommendations provided in this comment letter, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided.

Thank you for the opportunity to provide comments. South Coast AQMD staff are 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

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SW:DN

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