

**City of Rancho Cucamonga
El Camino Project
Final Environmental Impact Report
(State Clearinghouse # 2023080369)**

Lead Agency:

City of Rancho Cucamonga
Planning Department
10500 Civic Center Drive
Rancho Cucamonga, CA 91730



Consultant to the City:

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September 16, 2025

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- B California Air Resources Board (CARB)
- C State Water Resources Control Board

Regional Agencies/Companies

- D Southern California Gas Company
- E Cucamonga Valley Water District (CVWD)
- F South Coast Air Quality Management District (SCAQMD)

Regional Organizations

- G Lozeau-Drury LLP representing Supporters Alliance for Environmental Responsibility (SAFER)
- H Blum, Collins, & Ho LLP representing Golden State Environmental Justice Alliance (GSEJA) including supporting analysis letter from SWAPE
- I Advocates for the Environment

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1.0 INTRODUCTION

This Final Environmental Impact Report (FEIR) has been prepared to comply with Sections 15088 and 15089 of the State California Environmental Quality Act (CEQA) Guidelines (Guidelines). The City of Rancho Cucamonga (City) has prepared the Final EIR pursuant to the CEQA Guidelines, including Sections 15086 (Consultation Concerning Draft EIR) and 15088 (Evaluation of and Responses to Comments). As noted in Section 15089(b) of the Guidelines, the focus of a FEIR should be on responses to comments on the Draft Environmental Impact Report (DEIR). In conformance with these guidelines, the Final EIR consists of the following volumes:

- (1) The **Draft EIR** circulated for a 45-day public agency and public review and comment period commencing on April 29, 2025, and ending on June 13, 2025. A Notice of Availability was sent to neighboring cities, other government agencies and non-governmental interested parties. The City's Notification List for the DEIR is provided in Section 4.0 (Public Circulation) of this FEIR.
- (2) This **Final EIR document** includes all written comments received on the Draft EIR during the 45-day public review period, the written responses of the City to these comments, revisions to the Draft EIR in response to comments (presented in Section 3, Errata) and the public circulation record. None of the revisions to the Draft EIR represents a substantial increase in the severity of an identified significant impact or the identification of a new significant impact, or alternative considerably different from those already considered in the Draft EIR.

Certification of this Final EIR by the Rancho Cucamonga City Council must occur prior to approval of the El Camino Project (proposed Project or Project).

Availability of EIR Materials

All materials related to the preparation of this EIR, including information incorporated by reference, were available for public review. The Notice of Preparation and the Draft EIR were posted on the City's website:

https://www.dropbox.com/scl/fo/ezgw6i02xipw2atbx5iv8/AEd9DB51IJZvnP3RkgI0-u8/EI%20Camino?dl=0&rlkey=is2wz9w5mgwjiezsbt50d6c1e&subfolder_nav_tracking=1

All materials related to the preparation of this EIR were also available for public review at the three local libraries and at the following location:

Rancho Cucamonga Planning Department
10500 Civic Center Drive
Rancho Cucamonga, CA 91730

Following the 45-day period of circulation and public review of the Draft EIR, all comments and the City's responses to the comments have been incorporated into this Final EIR prior to certification of the document by the City of Rancho Cucamonga.

Summary Project Description

A private company, Lone Oak – Rancho LLC, is proposing to expand an existing beverage distribution facility. Existing development currently occupies the southern and northern portions of the site (approx. 17.9 acres) while the central portion (a former vineyard) occupies 12.2 acres of the site. The southern portion is developed with a beverage distribution facility and two office buildings. The northern portion of the site contains an existing 62,210-square foot warehouse on approximately three acres. The Project applicant is proposing to demolish up to 237,895 square feet of existing buildings and construct up to 1,054,541 square feet of new manufacturing, light industrial, and office uses on the Project site. Building heights will range from 34 to 130 feet and the Project will have a solar energy/battery storage system and a cogeneration system to help reduce energy consumption.

The proposed Project includes two different development options. Phase 1 plus Phase 2A results in 783,741 net square feet of building area of non-residential uses (Industrial and Office), not including a new parking structure which does not generate vehicular trips or house employees. In contrast, Phase 1 plus Phase 2B results in 761,616 square feet of building area, or 22,125 less square feet than Phase 1 plus Phase 2A. The difference between the two options is that Phase 2A would reuse an existing 62,210 square-foot warehouse building while Phase 2B would demolish the existing warehouse building and construct a new 40,085 square foot light industrial building.

IMPORTANT NOTE: The applicant originally submitted a request for a Tentative Parcel Map but during the public review period of the EIR decided to eliminate the Development Agreement and instead use a Vesting Tentative Parcel Map (VTPM) to memorialize the various development fees associated with the parcel map. With the VTPM, there would no longer be a need for a Development Agreement. These changes to the Project Description are outlined in FEIR Section 3, Errata.

Contents of this Final EIR

The contents of this FEIR include the following sections:

Section 1: Introduction

Provides an overview of the EIR process and how comments on the Draft EIR will be addressed.

Section 2: Responses to Comments

The City published a Notice of Availability and circulated the Draft EIR for public review and comment for a 45-day review period from April 29, 2025, through June 13, 2025. Ten (10) pieces of correspondence were submitted to the City during the review period (either written letters or emails). This section includes a list of all correspondence submitted to the City of Rancho Cucamonga, each identified by a letter for later reference, together with the authors and the dates the letters were issued. Following this list, each comment letter is presented, with numbered brackets to highlight specific comments, followed by a written responses to each bracketed comment.

Review of Environmental Documents. Section 15204 of the CEQA Guidelines provides guidance to the public and public agencies in reviewing CEQA documents. This section is designed not to limit the scope of comments that can be submitted but to focus comments on issues that are

substantive to the environmental analysis. Commenting entities should focus on the adequacy of the document in identifying and analyzing impacts to the environment, and should identify any areas they believe to be inadequate. The guidance indicates that comments should be submitted in a manner that:

- Identifies a specific environmental effect
- Supports the effect and its significance with substantial evidence

Comments should include alternatives or mitigation measures to avoid or reduce identified, specific environmental effects. This section reiterates that the lead agency is bound by “reasonableness” and “good faith” in its analysis and that the lead agency is not required to respond to comments on the FEIR that do not identify significant environmental issues.

Each response provided in this Final EIR is coded to correspond to the individual comment/author and each of the bracketed comments in that letter. The response will identify if the response introduces “new significant information” under any of the four categories identified in Section 15088 et seq. of the CEQA Guidelines.

Evaluation of Comments. Section 15088 et seq. of the State CEQA Guidelines provides guidance on the evaluation and response to comments received during circulation of the Draft EIR. To summarize:

- The lead agency must evaluate all comments received during the public review period and prepare a written response to comments on significant environmental issues.
- The lead agency must provide the response to the commenting entity at least 10 days prior to certification of the EIR.
- The response must:
 - Identify any significant environmental issues raised in the comment;
 - Explain, if necessary, why any recommendations provided in the comment were not accepted; and
 - Be supported by reasoned analysis.
- Responses may be provided as direct revisions to the DEIR or as a separate section of the FEIR with marginal notes in the DEIR text indicated that it was subsequently revised.

A lead agency is required to recirculate the DEIR if “significant new information” is introduced during the public comment period. “Significant new information” includes:

1. New significant impacts
2. Substantial increases in the severity of impacts
3. Feasible alternatives or mitigation that would reduce significant impacts
4. Identification of inadequacies in the analysis

Recirculation is *not* required when new information is not significant; this includes:

- Revisions that clarify or amplify an adequate analysis
- Insignificant modifications (such as spelling and grammar corrections)

Section 3: Errata

This section identifies revisions to the Draft EIR to incorporate clarifications developed in response to comments on the Draft EIR. Additions to the text are underlined and deletions have

been stricken through. No substantial revisions were made to the Draft EIR, and recirculation of the document is not required pursuant to CEQA.

Section 4: Notices and Distribution

This consists of notices concerning the City's intent to prepare an EIR (Notice of Preparation) and release of the Draft EIR for public review and comment (Notice of Completion and Availability), and the list of agencies, groups and individuals who were sent notices and/or a copy of the Draft EIR.

Section 5: Mitigation Monitoring and Reporting Program

CEQA and the State CEQA Guidelines (PRC Section 21081.6 and State CEQA Guidelines Sections 15091[d] and 15097) require public agencies "to adopt a reporting and monitoring program for changes to the project which it has adopted or made a condition of project approval to mitigate or avoid significant effects on the environment." A Mitigation Monitoring and Reporting Program (MMRP) is required for the proposed project because the EIR identifies potential significant adverse impacts related to the project implementation, and mitigation measures have been identified to reduce those impacts. Adoption of the MMRP would occur along with approval of the project.

2.0 RESPONSE TO COMMENTS

The Draft EIR was circulated for 45-day public review and comment period beginning April 29, 2025 and ending on June 13, 2025. A Notice of Availability was sent to government agencies, neighboring cities, and non-governmental interested parties. The City's Local Agency Notification List, showing who received notice of the Draft EIR, is provided in Section 4.0 - Public Circulation - of this FEIR. Ten (10) comment letters or emails were received from various agencies, conservation organizations, and private groups, as well as electronic notice from the California Office of Planning and Research (OPR) acknowledging receipt of the Draft EIR.

The correspondence listed in Table 2-1 (Draft EIR Comments) was submitted to the City of Rancho Cucamonga concerning the Draft EIR. Written responses to comments are subsequently provided. The following responses to comments include a summary statement to identify if the response will introduce "new significant information" under any of the four categories identified in Section 15088 et seq. of the CEQA Guidelines or if it does not introduce "new significant information." The four general categories are:

1. New significant impacts
2. Substantial increases in the severity of impacts
3. Feasible alternatives or mitigation that would reduce significant impacts
4. Identification of inadequacies in the analysis

A copy of each comment letter, followed by the City's written responses to those comments follow.

**Table 2-1
DEIR Comments**

ID	Agency/Organization/Individual	Date
State Agencies		
A	California Office of Planning & Research, State Clearinghouse acknowledging receipt and posting of the DEIR	4-29-25
B	California Air Resources Board (CARB)	6-13-25
C	State Water Resources Control Board	6-12-25
Regional Agencies/Companies		
D	Southern California Gas Company	4-29-25
E	Cucamonga Valley Water District (CVWD)	6-12-25
F	South Coast Air Quality Management District (SCAQMD)	6-13-25
Regional Organizations		
G	Lozeau-Drury LLP representing Supporters Alliance for Environmental Responsibility (SAFER)	4-29-25
H	Blum, Collins, & Ho LLP representing Golden State Environmental Justice Alliance (GSEJA) including supporting analysis letter from SWAPE	6-11-25
I	Advocates for the Environment	6-12-25
City Organizations		
J	City of Ontario	6-12-25
Private Individuals/Organizations/Companies		
	None	NA

COMMENT LETTER A – CALIFORNIA STATE CLEARINGHOUSE

2.0 Response to Comments

4/30/25, 12:36 PM

Moore Iacofano Goltsman Inc Mail - FW: SCH Number 2023080369



LETTER A

Kent Norton <norton@migcom.com>

FW: SCH Number 2023080369

3 messages

Mcpherson, Sean <Sean.McPherson@cityofrc.us>
To: Kent Norton <norton@migcom.com>

Wed, Apr 30, 2025 at 11:39 AM

Hi Kent, See confirmation below.

Thanks for all your hard work.

Thanks,

Sean

From: Marilyn Wesley <MARILYN.WESLEY@lci.ca.gov>
Sent: Tuesday, April 29, 2025 6:35 PM
To: Mcpherson, Sean <Sean.McPherson@cityofrc.us>
Subject: SCH Number 2023080369

CAUTION: This email is from outside our Corporate network. Do not click links or open attachments unless you recognize the sender and can confirm the content is safe.

Thank you for using CEQA Submit.

Public Resources Code (PRC) Section 21091(c)(3) and Guidelines Section 15105(e) allows the State Clearinghouse (SCH) to distribute CEQA documents within three working days after the date of receipt if the submittal is determined by the State Clearinghouse to be complete. Additionally, the State agency review period does not begin until the SCH distributes the CEQA document to State agencies. (Pub. Resources Code, § 21093(c)(2).)

Your project is published and available for review. Please note the State and Local review 'start' and 'end' dates.

To view your project and any attachments via CEQAnet, from CEQA Submit: Click "Navigation" and select "Published Document"

Additional information is on State Clearinghouse (SCH) website - FAQs: <https://lci.ca.gov/sch/faq.html>

Notice of Closing Letters: The SCH will not provide a close of review period acknowledgement on your CEQA environmental document. Comments submitted by State agencies are made available on CEQAnet by the SCH during and after the review period.

To view comments on your project via CEQAnet, please visit: <https://ceqanet.opr.ca.gov/Search/Advanced>

- Search for the SCH# using the Advanced Search in [CEQAnet](#)
- Select the correct document.
- Under "Attachments," view attachments labeled "State Comment Letters [Comments from State Reviewing Agency(ies)]"
- If there are no comments from a State agency about your project, it means none have been received.

To get more information on a specific project, contact the lead agency responsible for it directly.

****When Requesting Updates to Published/Posted Document(s)/Project(s):** Please note that the State Clearinghouse (SCH) does not remove attachments from published projects unless there is confidential information that cannot be displayed online.

To make changes to a published document, send requests and any attachments to state.clearinghouse@opr.ca.gov. Please also provide a brief memo on lead agency letterhead explaining what changes/corrections have been made.

<https://mail.google.com/mail/u/0/?ik=663d1de7a0&view=pt&search=all&permthid=thread-f:1830842644979787958&simpl=msg-f:18308426449797879...> 1/2

4/30/25, 12:36 PM

Moore Iacofano Goltsman Inc Mail - FW: SCH Number 2023080369

To view your submission, use the following link.
<https://ceqasubmit.opr.ca.gov/Document/Index/290298/4>

Please contact the SCH with any questions at state.clearinghouse@opr.ca.gov.

Thank you,

Marilyn Wesley
CEQA Program Analyst, State Clearinghouse
Governor's Office of Land Use and Climate Innovation
1400 10th Street | Sacramento, CA 95814
Email: Marilyn.Wesley@lci.ca.gov



****Note:** No reply, response, or information provided constitutes legal advice.

Confidentiality Notice: The information contained in this email and any attachments is for the exclusive use of the intended recipient(s) and may contain confidential and privileged information. It is the property of the California Governor's Office of Land Use and Climate Innovation. Unauthorized use, disclosure, or copying of this communication or any part thereof is strictly prohibited and may be unlawful. If you are not the intended recipient, please notify the sender immediately by return email and destroy all copies of the original message and any attachments.

Kent Norton <knorton@migcom.com>
To: "Mcpherson, Sean" <Sean.McPherson@cityofrc.us>

Wed, Apr 30, 2025 at 12:34 PM

Glad to help, too bad it was such a difficult process...
[Quoted text hidden]

Kent Norton <knorton@migcom.com>
To: "Mcpherson, Sean" <Sean.McPherson@cityofrc.us>

Wed, Apr 30, 2025 at 12:35 PM

nevermind, I see what I need is in another email...

On Wed, Apr 30, 2025 at 11:40 AM Mcpherson, Sean <Sean.McPherson@cityofrc.us> wrote:
[Quoted text hidden]

<https://mail.google.com/mail/u/0/?ik=663d1de7a0&view=pt&search=all&permthid=thread-f:1830842644979787958&simpl=msg-f:18308426449797879...> 2/2

ID	Response to Comment Email A - State Clearinghouse
A-1	The City acknowledges this notice from the State Clearinghouse of receipt of the Draft EIR and that they were distributed to state agencies for their review and comment. We also acknowledge the 45-day public review period runs from April 29, 2025, to June 13, 2025, consistent with our local distribution and newspaper notification date. Thank you for your assistance in this regard.

COMMENT LETTER B – CALIFORNIA AIR RESOURCES BOARD (CARB)



Gavin Newsom, Governor
Yana Garcia, CalEPA Secretary
Liane M. Randolph, Chair

LETTER B

June 13, 2025

Sean McPherson
Principal Planner
City of Rancho Cucamonga
10500 Civic Center Drive
Rancho Cucamonga, California 91730
sean.mcpherson@cityofrc.us

Sent via email

Sean McPherson:

Thank you for providing the California Air Resources Board (CARB) with the opportunity to comment on the El Camino Project (Project) Draft Environmental Impact Report (DEIR), State Clearinghouse No. 2023080369. The Project proposes to expand an existing beverage distribution facility by demolishing up to 237,895 square feet of existing buildings and construct up to 1,054,541 square feet of new manufacturing, light industrial, and office uses on a Project site of 30.1 acres. The Project is proposed to be developed in two phases. Phase 1 includes the demolition of approximately 175,685 square feet of existing structures, the reuse of 32,890 square feet of existing building space, and the construction of 959,441 square feet of new office, light industrial, and warehouse facilities, including a multi-level parking structure. Phase 2 focuses on redeveloping roughly four acres in the northern portion of the site, where an existing building is located, and offers two alternatives. Phase 2A would retain and repurpose the existing 62,210-square-foot building for light industrial use, while Phase 2B would demolish that building and construct a new 40,085-square-foot light industrial facility in its place. Once fully built, the proposed Project would result in up to 3,230 daily vehicle trips along local roadways, including 1,300 daily truck trips.¹ The Project is proposed within the City of Rancho Cucamonga (City), California, which is the lead agency for California Environmental Quality Act (CEQA) purposes.

B1

CARB staff are concerned that the Project will expose nearby residential communities to elevated levels of air pollution beyond the existing baseline emissions at the Project site. Residences are located to the east and southeast of the Project site, with the closest residence located within 1,798 feet of the Project's northwesternmost boundary. In addition to residences, Cucamonga Elementary School, Ontario Charter School Elementary School, and Rancho Cucamonga Middle School are located within two miles of the Project. These residences and schools are located near existing toxic diesel particulate matter (diesel PM) emission sources, which include existing industrial facilities, aircraft traffic from Ontario

B2

¹ City of Rancho Cucamonga. El Camino Project Draft Environmental Impact Report. Page 4.17-13. Table 4.17-2. Accessible at <https://ceqanet.opr.ca.gov/2023080369/4/Attachment/CihHJY>

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International Airport, rail traffic along existing rail lines, and vehicular traffic along State Routes 10 and 15.

The State of California has placed additional emphasis on protecting local communities from the harmful effects of air pollution through the passage of Assembly Bill 617 (AB 617) (Garcia, Chapter 136, Statutes of 2017). AB 617 is a significant piece of air quality legislation that highlights the need for further emission reductions in communities with high exposure burdens, like those in which the Project is located. Diesel PM emissions generated during the construction and operation of the Project would negatively impact neighboring communities.

Through its authority under Health and Safety Code section 39711, the California Environmental Protection Agency (CalEPA) is charged with the duty to identify disadvantaged communities. CalEPA bases its identification of these communities on geographic, socioeconomic, public health, and environmental hazard criteria (Health and Safety Code, section 39711, subsection (a)); In this capacity, CalEPA currently defines a disadvantaged community, from an environmental hazard and socioeconomic standpoint, as a community that scores within the top 25% of the census tracts as analyzed by the California Communities Environmental Health Screening Tool Version 4.0 (CalEnviroScreen). CalEnviroScreen uses a screening methodology to help identify California communities currently disproportionately burdened by multiple sources of pollution. The census tract containing the Project is within the top 74% for Pollution Burden. Although not classified as a disadvantaged community, the City must ensure that the Project does not adversely impact neighboring disadvantaged communities.

B2

Industrial developments, such as those proposed under the Project, can result in high daily volumes of heavy-duty diesel truck traffic and operation of on-site equipment (e.g., forklifts and yard tractors) that emit toxic diesel emissions, and contribute to regional air pollution and global climate change.² Due to the Project's proximity to residences and schools already disproportionately burdened by multiple sources of pollution, CARB's comments below express concerns with the potential cumulative air quality impacts associated with the construction and operation of the Project. To protect the health of these communities, City and applicant have an obligation to construct and operate the Project using the zero-emission technologies provided in this letter.

² With regard to greenhouse gas emissions from this project, CARB has been clear that local governments and project proponents have a responsibility to properly mitigate these impacts. CARB's guidance, set out in detail in the Scoping Plan issued in 2022, explains that in CARB's expert view, local mitigation is critical to achieving climate goals and reducing greenhouse gases below levels of significance. CARB's 2022 Scoping Plan for Achieving Carbon Neutrality, published November 16, 2022, is available at https://ww2.arb.ca.gov/sites/default/files/2022-12/2022-sp_1.pdf

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The City Used Inappropriate Trip Lengths When Modeling the Project's Air Quality Impacts from Mobile Sources

The City may have underestimated mobile source air pollutant emissions in the DEIR by relying on unrealistic truck trip lengths. According to the California Emissions Estimator Model (CalEEMod) input files presented in Appendix C (Air Quality, Health Risk, GHG, and energy DATA) of the DEIR, the Project's mobile air quality impacts were modeled assuming trucks would travel a maximum distance of 38 miles. The City does not provide any substantial evidence in the DEIR explaining why this would be a conservative trip distance. Since trucks serving the Project may originate from the Ports of Long Beach and Los Angeles, which are approximately 57 miles from the Project site, CARB urges the City to use Project-specific truck trip distances in their air quality impact analysis. Unless the City re-evaluates or provides substantiation for the designated truck trip lengths, the Project should include a mitigation measure or project design feature that restricts trucks from traveling a distance greater than what was analyzed in the DEIR.

B3

The City Used Inappropriate Assumptions When Modeling the Project's Health Risk Impacts

The Health Risk Analysis (HRA) prepared for the Project and presented in Section 4.3 (Air Quality) of the DEIR concluded that residences near the Project site would be exposed to diesel PM emissions that would result in cancer risks of approximately 8.1 chances per million during the combined construction and operation of the Project. Since the Project's cancer risks were below the South Coast Air Quality Management District's (SCAQMD) significance threshold of 10 chances per million, the DEIR concluded that the Project would have a less than significant health risk impact. CARB is concerned that the City may have underestimated the Project's potential health risk impacts by relying on modeling assumptions not supported by substantial evidence.

The City may have underestimated the Project's operational health risk impacts by assuming an idling duration for onsite heavy-duty trucks that is not supported by substantial evidence. The City assumed an idling duration of 15 minutes for onsite heavy-duty trucks when evaluating the Project's health risk impacts. CARB's Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling (ATCM) restricts trucks from idling longer than five minutes. However, the ATCM has an exemption for trucks equipped with a diesel engine meeting the optional nitrogen oxides (NOx) idling emissions standard when operating outside of 100 feet of a restricted area (e.g., residences, schools).³ Because trucks starting with model year 2008+ are clean-idle certified, many of the trucks operating within the Project site could idle longer than five minutes. According to Table 4.4.2-5 of the EMFAC2021 Volume III Technical Document, heavy-duty trucks can idle for as long as

B4

³ CARB. Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling. Accessible at https://ww2.arb.ca.gov/sites/default/files/2022-06/13_CCR_2485_OAL_06222022-2_ADA_06272022_0.pdf

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approximately five hours in any one location, well above the 15 minute idling duration assumed in the HRA.⁴ To fully evaluate the Project's potential unmitigated health risk impacts, the City must revise the Project's HRA to assume a heavy-duty truck idling duration supported by substantial evidence.

The Project's operational HRA did not evaluate potential health risk impacts from the operation of trucks and trailers with transport refrigeration units (TRUs) visiting the Project site.⁵ TRUs on trucks and trailers can emit large quantities of diesel PM while operating within the Project site and along local roadways. Residences and other sensitive receptors (e.g., daycare facilities, senior care facilities, and schools) located near where these TRUs could be operating, would be exposed to diesel PM that could result in a significant air quality impact. According to the Section 3.5 (Project Characteristics) of the DEIR, the Project would include 1,000 square feet of cold storage space. Although the Project would include cold storage space, the City states in the DEIR that health risk impacts associated with trucks and trailers with TRUs were not evaluated "since the facility would only include approximately 1,000 square feet of warehousing space dedicated to cold storage."⁶ To fully understand the Project's potential health risk impacts to neighboring communities, the operational HRA should be revised to include the potential health risk impacts associated with the on- and off-site operation of trucks and trailers with TRUs visiting the Project site.

B5

The Project's operational HRA does not account for all nearby residential receptors. Based on CARB's review of Appendix C3.3 (Health Risks) of the Draft EIR, the City's modeling identifies the maximum exposed individual receptor as being located southeast of the Project site. However, aerial imagery reviewed by CARB indicates the presence of additional residences to the northwest of the Project site, specifically near the intersection of Haven Avenue and 26th Street, approximately 1,798 feet from the site's northwestern boundary. These residences were not included in the Project's AERMOD receptor grid. To accurately evaluate the Project's health risk impacts, these northwest residences should be incorporated into the HRA to ensure a complete and representative analysis of potential community exposure.

B6

⁴ CARB. EMFAC2021 Volume III Technical Document. Page 161. Table 4.4.2-5. Accessible at https://ww2.arb.ca.gov/sites/default/files/2021-03/emfac2021_volume_3_technical_document.pdf

⁵ TRUs are refrigeration systems powered by integral diesel engines that protect perishable goods during transport in an insulated truck and trailer vans, rail cars, and domestic shipping containers.

⁶ City of Rancho Cucamonga. El Camino Project Draft Environmental Impact Report. Page 4.3-39. Accessible at <https://ceqanet.opr.ca.gov/2023080369/4/Attachment/CIhHJY>

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The City Does Not Analyze Potential Air Quality Impacts from the Project's Transport Refrigeration Units

As previously discussed, the City did not estimate the potential air quality impacts associated with trucks and trailers with TRUs serving the Project.⁷ The unmitigated air pollutant emission estimates provided in Section 4.3 (Air Quality) of the DEIR, were modeled using the CalEEMod. Although CalEEMod can estimate air pollutant emissions from area, energy, and mobile sources, the current version of CalEEMod does not account for air pollutant emissions from trucks and trailers with TRUs. Since a portion of the Project could be used for cold storage, CARB urges the City to model and report the Project's air pollution emissions from the operation of on and off site TRUs using CARB's latest emission factors. The City should assume that a percentage of the Project's truck fleet is equipped with TRUs and should estimate the idling duration for each TRU; assumptions should be supported by substantial evidence, and estimates of TRU percentage and idling time should be conservative from a health protection standpoint.

B7

The City Must Include Meaningful Mitigation Measures to Reduce the Project's Potentially Significant Impact on Air Quality

The City concluded in Section 4.3 (Air Quality) of the DEIR that the operation of the Project would result in a potentially significant impact on air quality. According to Tables 4.3-23 (Unmitigated Operation - Phase 1 Regional Emissions Estimates) and 4.3-24 (Unmitigated Project Operation - Phase 2 Regional Emissions Estimates) of the DEIR, the operation of the Project emit NOx emissions as high as approximately 169 pounds per day, which would exceed the SCAQMD's 55 pounds per day significance threshold and would result in a significant impact on air quality.⁸ To mitigate the Project's operational air quality impacts, the DEIR includes five mitigation measures (Mitigation Measure AIR-2A through AIR-2E), which include requiring applicants to follow the voluntary Tier 1 clean air vehicle parking and EV charging rules from the California Green Building Code, implementing a commute trip reduction program, prohibiting diesel-fueled TRUs onsite, and requiring the installation of electric power to power on-site electric TRUs. Even after implementation of Mitigation Measure AIR-2A through AIR-2E, the City concludes in the DEIR that the Project's operational emissions of NOx would result in a significant and unavoidable impact on air quality.

B8

⁷ TRUs are refrigeration systems powered by integral diesel engines that protect perishable goods during transport in an insulated truck and trailer vans, rail cars, and domestic shipping containers.

⁸ City of Rancho Cucamonga. El Camino Project Draft Environmental Impact Report. Table 4.3-23 through Table 4.3-24. Page 4.3-55. Accessible: <https://ceqanet.opr.ca.gov/2023080369/4/Attachment/CihHJY>

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While CARB commends the City for requiring all trucks and trailers with TRUs to be electric and for requiring the installation of electric infrastructure to support electric TRUs. CARB urges the City revise Mitigation Measure AIR-2E to include one of the following mitigation measures in the DEIR:

- Require contractual language in tenant lease agreements that prohibits tenants from operating diesel powered TRUs within the Project-site; or
- A condition requiring a restrictive covenant over the parcel that prohibits the applicant's use of TRUs on the property unless the applicant seeks and receives an amendment to its conditional use permit allowing such use.

To further reduce the health risk impacts of the Project, particularly those related to diesel PM and other toxic air contaminants (TACs), CARB urges the City to implement the following emission reduction measures as either project design features or mitigation measures in the DEIR.

- Include contractual language in tenant lease agreements that requires future tenants to exclusively use zero-emission light and medium-duty delivery trucks and vans.
- Include contractual language in tenant lease agreements that requires all service equipment (e.g., yard hostlers, yard equipment, forklifts, and pallet jacks) used within the project site to be zero-emission.
- Include contractual language in tenant lease agreements that requires all heavy-duty trucks entering or on the project site to be zero-emission, and to be fully zero-emission. Incentive funds can be obtained from the Carl Moyer Program and Voucher Incentive Program.⁹
- Include contractual language in tenant lease agreements restricting trucks and support equipment from idling longer than two minutes while on site.
- Include rooftop solar panels for each proposed industrial building to the extent feasible, with a capacity that matches the maximum allowed for distributed solar connections to the grid.
- Include contractual language in tenant lease agreements, requiring all emergency generators to be powered by a non-diesel fuel.

These measures are not only technically and economically feasible, but also consistent with the increasing availability of zero-emission technologies in the heavy-duty transportation and industrial sectors. Implementing these requirements will significantly reduce health risks, improve local air quality, and ensure that the Project does not exacerbate existing environmental burdens.

⁹. Carl Moyer Program and Voucher Incentive Program. <https://ww2.arb.ca.gov/carl-moyer-program-apply>

Sean McPherson
June 13, 2025
Page 7

Conclusion

CARB is concerned about the Project's air quality and public health impacts. To fully assess the Project's impact on neighboring communities, the City must evaluate the potential air quality and health risk impacts associated with trucks and trailers with TRUs visiting the Project site and assess air quality impacts using trip distances supported by substantial evidence. The HRA should be updated to include a justification for the assumed 15-minute truck idling duration and health risk impacts from on- and off-site trucks and trailers with TRUs. Lastly, to mitigate the Project's significant and unavoidable impact on air quality, CARB urges the City to include a mitigation or design measure in the DEIR that requires trucks serving the Project to be zero-emission at the start of operations.

CARB appreciates the opportunity to comment on the DEIR for the Project. Given the breadth and scope of projects subject to CEQA review throughout California that have air quality and greenhouse gas impacts, coupled with CARB's limited staff resources to substantively respond to all issues associated with a project, CARB must prioritize its substantive comments here based on staff time, resources, and its assessment of impacts. CARB's deliberate decision to substantively comment on some issues does not constitute an admission or concession that it substantively agrees with the lead agency's findings and conclusions on any issues on which CARB does not submit substantive comments.

CARB staff can provide assistance with zero-emission technologies and emission reduction strategies, as needed. Please include CARB on your list of selected State agencies that will receive the Final Environmental Impact Report (FEIR). If you have questions, please contact Stanley Armstrong, Air Pollution Specialist via email at stanley.armstrong@arb.ca.gov.

Sincerely,



Matthew O'Donnell, Chief, Risk Reduction Branch

cc: State Clearinghouse
state.clearinghouse@opr.ca.gov

Sam Wang, Program Supervisor- CEQA IGR, South Coast Air Quality Management District
swang1@aqmd.gov

Morgan Capilla, NEPA Reviewer, U.S. Environmental Protection Agency, Air Division, Region 9
capilla.morgan@epa.gov

Stanley Armstrong, Air Pollution Specialist, Risk Reduction Branch

9

ID	Response to Comment Letter B – California Air Resources Board
B-1	The California Air Resources Board (CARB) provides introductory remarks that provide an accurate summary of the Project. Since the comment does not raise any specific questions or comments on the DEIR, no further response is warranted.
B-2	CARB presents information on the Project's environmental and regulatory setting, its potential cumulative air quality impacts, and the Project's obligation to be constructed using zero-emission (ZE) technologies. As described in more detail, below the environmental and regulatory information provided by CARB is commensurate with the information in the DEIR, and the DEIR incorporates feasible mitigation measures into the Project that reduce the Project's potential adverse air quality impacts. First, CARB expresses concern that the Project will expose nearby residential and school receptors to elevated levels of air pollution. Specifically, CARB identifies that residential receptors are located 1,798 feet from the Project's northwesternmost boundary, that the Cucamonga Elementary School, Ontario Charter Elementary School, and Rancho Cucamonga Middle School are all located within two miles of the Project site, and that these residences and schools are exposed to toxic air contaminants (TACs), including diesel particulate matter (diesel PM), from existing industrial facilities, air and rail facilities, and Interstate 10 (I-10) and I-15. As a point of clarification, the three schools identified by CARB are all located at least approximately 0.7 miles (3,650 feet) from the Project boundary and even farther from on-site emissions sources like truck docks and stationary sources. The DEIR (pp. 4.3-10 and 4.3-11) defines and identifies the sensitive air quality receptors located closest to the Project site, including a daycare and residences approximately 370 feet and 1,430 feet east of the Project, respectively, both of which are closer than the residences identified by CARB. Furthermore, the DEIR also specifically states (p. 4.3-11): "The existing sensitive air quality receptors located adjacent to or in proximity of the Project site, are exposed to air pollution associated with light industrial / warehousing activities in proximity of the site, motor vehicles operating on the I-10 and I-15 (as well as the local streets around the Project site), and overhead aircraft from Ontario International Airport." Thus, the DEIR already accurately identifies the locations and environmental setting for the sensitive air quality receptors that would be most affected by the Project. Second, CARB presents information on Assembly Bill (AB) 617 and notes the California Environmental Protection Agency is charged with a duty to identify disadvantaged communities, defined as a community that scores within the top 25% of the census tracts as analyzed by the California Communities Environmental Health Screening Tool (CalEnviroScreen), Version 4.0. CARB also notes the census tract that contains the Project site is within the top 74% for pollution burden. However, the history of the census tract's scoring under the previous 2017 version of CalEnviroScreen (Version 3.0) should be mentioned. In order to maintain funding and program consistency, SB 535 continues to designate areas that were in the top 25th percentile under CalEnviroScreen Version 3.0, but that are no longer in the top 25th percentile under CalEnviroScreen Version 4.0, as disadvantaged communities. CalEnviroScreen Version 4.0 was updated with improvements to data and methodology, and is considered an accurate reflection of the most recent pollution exposures and population vulnerabilities that communities face. As shown in the DEIR

ID	Response to Comment Letter B – California Air Resources Board
	(pp. 4.3-13 and 4.13-4), under CalEnviroScreen Version 4.0, the Project site is not located in a census tract in the top 25th percentile for statewide pollution burden. The DEIR (pp. 4.3-11 to 4.3-14) includes a detailed description of existing sources of air pollution that could affect local air quality conditions, including information on the South Coast Air Quality Management District's (SCAQMD) Multiple Air Toxics Evaluation Study (MATES V), CalEnviroScreen information for the census tract the Project is located in (6071002110), and a list of existing light industrial, manufacturing, and warehousing facilities within approximately ¼ mile of the Project site. Thus, the DEIR already includes pollution burden information that is commensurate with that provided by CARB. The City notes the DEIR did not include a description of AB 617 in DEIR (4.3.2 (Air Quality Regulatory Framework)) because the Project area is not specifically subject to any community emission reduction plan requirements pursuant to this legislation. Thus, AB 617 is not an applicable regulation that requires discussion in the EIR. However, it should be noted that AB 617 is a distinct and separate process from SB 535 disadvantaged community status and most SB 535 disadvantaged communities do not have AB 617 emission reduction plans. Finally, CARB generally states that industrial developments, such as the proposed Project, can result in high levels of truck traffic and on-site equipment operations that emit diesel PM and contribute to regional air pollution and global climate change. CARB then notes that given the Project's proximity to residences and schools already disproportionately burdened by pollution, the remainder of CARB's comments focus on the potential cumulative air quality impacts of the Project and the need to construct and operate the Project using ZE technologies. As described above, the DEIR already includes environmental and regulatory setting information commensurate with information provided by CARB that supports the DEIR's evaluation of potential individual and cumulative air quality impacts. Refer to response to comments B3 to B8 for additional details on the DEIR's air quality analysis. However, it should be noted that MM-AIR-2E has been revised to include a commitment to initially use 8 ZE trucks.
B-3	CARB asserts the DEIR's use of an average truck trip length of approximately 38 miles per one-way trip is not supported by substantial evidence and underestimates potential emissions from trucks because the Project site is located 57 miles from the Ports of Long Angeles and Long Beach (POLA/LB). As described in more detail below, the DEIR's analysis of potential emissions from truck travel is based on SCAQMD-methodology and is consistent with information on the existing and anticipated future trucking activity at the site provided by the applicant (see FEIR Appendix I). The DEIR's methodology and analysis of truck emissions, therefore, are substantiated, and there is no specific evidence presented by the SCAQMD to support its assertion that the DEIR underestimates truck emissions. First, as explained on DEIR pp. 4.3-16 and 4.3-35, the DEIR's average one-way truck trip length for existing (37.4 miles per one-way trip) and Project (37.8 miles per one way trip) conditions was derived using a combination of Project-specific truck trip generation rates and truck trip length data from the Southern California Association of Governments' (SCAG) 2016 Regional Transportation Plan (RTP) that was used by the SCAQMD in its development of SCAQMD Rule 2305 (Warehouse Indirect Source Rule - Warehouse Actions and Investments to Reduce Emissions [WAIRE] Program). The SCAG and SCAQMD data identify a 15.3-mile trip length for Class 2b-3 trucks, a 14.2-mile trip length for Class 4-7 trucks, and a 39.9-mile trip length for Class 8 trucks.

ID	Response to Comment Letter B – California Air Resources Board
	The DEIR's analysis weights the truck trip length based on the Project-specific truck trip characteristics identified in the Project's transportation impact study (TIS)(DEIR Appendix K-2). Thus, the DEIR's methodology considers the fact that some trucks may travel farther than others to reach the Project and applies Project-specific information to derive a weighted average trip length for the Project. Second, CARB asserts the DEIR underestimates truck emissions based solely on the fact that the Project site is located more than 38-miles from the POLA/LB. While, as a general fact, it is true the Project site is located more than 38 miles from the POLA/LB, CARB provides no specific evidence that Project truck trips would travel directly between these ports and the Project site. Therefore, the use of a 57-mile one-way truck trip length is not appropriate for the Project. Third, the proposed Project does not consist of a speculative warehouse building that may or may not be served by trucks from POLA/LB. Rather, the proposed Project is a beverage manufacturing and distribution facility that would replace existing beverage distribution operations. In the case of the proposed Project, the existing trucking operations at the site consist of a mix of Direct Store Distribution trips, or DSD trips, that go from the existing Rancho Cucamonga distribution center to retail and other point of sale locations, and shuttles that bring product from Rancho Cucamonga to another distribution center located in Victorville, approximately 43 miles from Rancho Cucamonga. The proposed Project would expand these existing operations and result in the displacement of other truck trips that currently travel from production centers in Downey and Los Angeles to distribution centers in Orange, Oceanside, Coachella, and Las Vegas. The City has reviewed information provided by the applicant on the average truck trip length based on existing and future anticipated operations at the Ranch Cucamonga site that indicates (see FEIR Appendix I): • The existing average trip distance for DSD, Victorville, and production/distribution routes is 44.0 miles per one-way trip, which is more than the EIR's 37.4-mile one-way trip length assumption. The DEIR, therefore, likely underestimated existing Project truck trip lengths. • The future average trip distance for DSD, Victorville, and production/distribution center routes with the proposed Project would be 37.4 miles per one-way trip, which is less than the EIR's 37.8-mile one-way trip length assumption. The DEIR, therefore, slightly overestimates future Project truck trip lengths. • Existing and future truck trip generation rates are likely to be lower than assumed by the DEIR. Thus, the DEIR's estimates of mobile source emissions are likely overestimated (see applicant info in FEIR Appendix I). Thus, since the DEIR underestimates existing truck trip lengths and overestimates future truck trip lengths, the resulting net change in emissions shown in DEIR Tables 4.3-23, 4.3-24, and 4.3-25 are slight overestimates of potential Project emissions and air quality impacts. For the reasons described above, the DEIR's weighted average truck trip length methodology represents a fact-based methodology that is consistent with existing and future trucking operations at the site. CARB does not present any specific evidence

ID	Response to Comment Letter B – California Air Resources Board
	that the Project's would result in a weighted average trip length that is substantially higher than that assumed in the DEIR, nor does it present any additional, specific information regarding why the DEIR underestimates truck emissions.
B-4	CARB accurately summarizes the findings of the DEIR's construction and operational health risk assessment (HRA) and expresses concern that DEIR may have underestimated health risk impacts by relying on modeling assumptions that are not supported by substantial evidence. As described in more detail below, the DEIR's HRA is based on fact-based assumptions for truck idling and changes to the air quality analysis are not warranted at this time. CARB states that the DEIR's idling duration assumption (15 minutes per truck that accesses the site) is not supported by substantial evidence because: 1) State regulations permit trucks to idle for more than 5 minutes when certain engine specification and location requirements are met, and 2) the EMFAC2021 Volume III Technical Document indicates certain trucks may idle for up to five hours per day. The City has reviewed the EMFAC Technical Document (pp. 159 to 161) and concluded the documentation shows only "out-of-state" registered trucks idle for up to five hours at a time. As noted in response to comment B-3, the existing and proposed Project trucking operations include primarily in-state routes that would be served by trucks registered in-state. While the EMFAC Technical Document (Table 4.4.2-5) does indicate that in-state truck idling times can vary between approximately 13 minutes and 4 hours and 17 minutes per day (i.e., not per stop), this general statewide data is not representative of the Project for the following reasons: - Existing and proposed Project trucking operations at the Project site are and would be subject to the Reyes Holdings Idle Policy (see FEIR Appendix I). This company-wide policy manages vehicle idle times, promotes fuel efficiency, reduces emissions, and ensures compliance with manufacturer engines specifications. The policy requires all fleet-owned vehicles to be set to automatically shut down after 5 minutes of idling unless ambient temperatures are above 100 degrees Fahrenheit or below 20 degrees Fahrenheit. - Fleet maintenance logs between March 25, 2025, and July 7, 2025, indicate that fleet trucks averaged less than 6 minutes of idling per stop (see FEIR Appendix I). - Existing and proposed non-fleet trucks are and would be informed of site policy that limits idling to 15 minutes or less under most conditions. As described above, the DEIR's assumption that trucks accessing the Project may idle for up to 15 minutes is supported by factual evidence including company policies and maintenance logs, and no change to the DEIR's evaluation of idling emissions is warranted at this time.
B-5	CARB states that the DEIR's operational HRA did not evaluate potential health risk impacts from the operation of trucks and trailers with TRUs. CARB is correct. As shown in FEIR Chapter 3, Errata, the City has revised the operational HRA to include the operation of TRUs and address other comments provided by CARB and the SCAQMD (see responses to comments F-7 and F-19. As shown in FEIR Chapter 3, the results of the revised HRA continue to show that the proposed Project would not

ID	Response to Comment Letter B – California Air Resources Board
	result in significant adverse health risks. Furthermore, the City notes that Mitigation Measure AIR-2E, as revised (see Chapter 3, Errata, requires the applicant to limit the use of diesel-fueled TRUs at the Project site. The TRU assumptions used in the revised HRA are described below. As noted in the DEIR (p. 4.3-39), the proposed Project includes 1,000 square feet of cold storage. This space would be used for limited storage of dry ingredients used in the beverage manufacturing process. Based on the operations at other beverage production centers, the applicant has estimated that up to two trucks per month would deliver cold storage ingredients to the Project site. Each truck was assumed to be equipped with a 33-horsepower TRU that meet Tier 2 emissions standards, and each truck would remain on-site for two hours. These assumptions are likely to overestimate TRU-related emissions because they assume diesel TRUs used at the site do not meet ultra-low emissions standards and have not yet been phased out pursuant to CARB's Airborne Toxic Control Measure for In-Use Diesel-Fueled TRUs and TRU Generator Sets, and Facilities Where TRUs Operate.
B-6	CARB states the DEIR's HRA does not account for all nearby residential receptors, specifically identifying residential receptors that are located 1,798 feet to the northwest of the Project site. As described in response to comment B-2, the DEIR (pp. 4.3-10 and 4.3-11) defines and identifies the sensitive air quality receptors that are located closest to the Project site, including a daycare and residences approximately 370 feet and 1,430 feet east of the Project site, respectively, and downwind of the Project's emissions sources (see DEIR Figure 4.3.1 and Figure 4.3.2). Thus, these receptors would be more impacted by the Project than receptors located farther away and upwind of the Project. The City has revised the modeled receptor grid (see FEIR Appendix H) to capture the CARB-identified residential area to the northwest and to include a discrete receptor point at the nearest school identified by CARB (Rancho Cucamonga Middle School) and these points have been used to estimate adverse health risks at the CARB-identified receptors. The results of the revised HRA indicate the residential area approximately 1,800 feet to the northwest of the Project would be exposed to annual average diesel PM concentrations and corresponding health risks that are approximately 91.3% less than the MEIR located 1,430 feet to the east of the Project site. Thus, the DEIR did accurately estimate worst-case health risks at sensitive receptor locations.
B-7	CARB restates that the DEIR's evaluation of potential air quality impacts does not include trucks and trailers with TRUs. As described in response to comment B-5, the City has revised the HRA to include the operation of TRUs at the site based on similar operations at other production facilities, and the inclusion of TRU operations in the air quality analysis did not result in a new or more severe air quality impact than identified in the DEIR.
B-8	CARB accurately summarizes the findings of the DEIR's air quality analysis and commends the City for certain actions incorporated into Mitigation Measure AIR-2E; however, CARB recommends additional requirements for mitigation measures. With regard to TRUs, CARB recommends the City either 1) require contractual language in tenant lease agreements that prohibits tenants from operating diesel-powered TRUs within the Project-site; or 2) include a restrictive covenant over the parcel that prohibits the applicant's use of TRUs on the property unless the applicant

ID	Response to Comment Letter B – California Air Resources Board
	seeks and receives an amendment to its conditional use permit allowing such use. The City has reviewed these recommendations and determined they are not necessary for the Project for several reasons. First, the proposed Project consists of the replacement of an existing beverage distribution with a larger beverage production and distribution center that would be constructed, owned, and operated by the applicant. The Project, therefore, would not involve speculative tenants that would necessitate contractual language in tenant lease agreements. Second, as discussed in more detail in response to comment B-5, Mitigation Measure AIR-2E, as revised (see Chapter 3), requires the applicant to power TRUs at the site using electricity or limit the amount of diesel TRUs at the site to know more than two trucks per month. Third, as shown in the proposed Mitigation Monitoring and Reporting Program (MMRP) for the Project, the requirements of all EIR mitigation measures will be incorporated into the Project's Conditional Use Permit (CUP; DRC-2023-00068). The inclusion of these measures in the CUP provides a legal enforcement mechanism to ensure EIR mitigation measures are implemented. As such, the inclusion of land use covenants in Mitigation Measure AIR-2E would not provide additional mitigation action and, therefore, is unnecessary. With regard to other sources of TACs, including diesel PM, CARB recommends the use of contractual language in tenant lease agreements to exclusively use ZE light and medium-duty delivery trucks and vans, service equipment, and heavy-duty trucks, to limit idling to no longer than two minutes on-site, and to require emergency generators to be powered by non-diesel fuel. As noted above, the proposed Project would not involve tenant lease agreements. Nonetheless, the City has reviewed the measured suggested by CARB and determined: • Light and medium-duty delivery trucks and vans and heavy-duty trucks: While ZE technologies in the heavy-duty transportation sector do exist, the City does not consider it feasible for the Project to require all light-, medium-, and heavy-duty trucks to be ZE vehicles from the start of operations because such technology has not yet been fully demonstrated at the distribution scale proposed by the Project. The applicant anticipates eventually having a full ZE fleet but will be dependent on potential electrical infrastructure planned for the future. In addition, goods movement is a complex process that may involve multiple stops. Trucks may be owned, operated, contracted, etc. as needed depending on operating characteristics, and neither the City nor individual developers can regulate mobile emissions, which is within the purview of regulatory agencies such as the U.S. EPA, CARB, and the SCAQMD. Those agencies can, and have, adopted regulations intended to reduce emissions from mobile sources, including trucks. The DEIR, for example, summarizes CARB's Advanced Clean Truck Rule, which accelerates the large-scale reduction of tailpipe emissions by focusing on ZE medium and heavy-duty vehicles based on what CARB considered to be feasible implementation schedules; however, the U.S. EPA recently rescinded the waiver necessary to implement this regulation. This action adds uncertainty to the implementation and adoption of ZE truck technologies that further renders a commitment to full ZE truck fleets infeasible at this time. The DEIR does, however, include Mitigation Measure AIR-2E, which requires the Project to exceed the mandatory EV charging readiness requirements for planned off-street loading spaces specified in the version of the California Green Building (CalGreen)

ID	Response to Comment Letter B – California Air Resources Board
	Code that is in effect at the time of building permit approval. Based on the 2022 CalGreen Code, this would result in the Project installing electric vehicle service equipment at 10% of the total truck docks included in the final Project design, and ensure all remaining docks have the infrastructure to support future electrification as ZE truck technology becomes more common. In addition, as shown in Chapter 3, Errata, the City has added a requirement to Mitigation Measure AIR-2E requiring the Project to use at least 8 ZE or near ZE on-road trucks in its proprietary vehicle fleet within the first year of operations after receiving a certificate of occupancy. Finally, as suggested by CARB, the City has modified Mitigation Measure AIR-2E to include a requirement to provide third-party trucking operators that access the site using diesel-fueled trucks information on the Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project (HVIP). HVIP provides point-of-sale vouchers for ZE vehicles, including trucks. By making ZE vehicle technologies more affordable, the program serves to accelerate their deployment of ZE vehicle technologies. • Service equipment: The proposed Project does not involve the use of any diesel-powered service equipment. As described in the DEIR (pp. 4.8-7 and 4.8-25), all existing and proposed yard equipment at the Project site, including forklifts, sweepers/scrubbers, aerial lifts, and yard trucks would be electric powered. Thus, all proposed yard equipment would be ZE equipment as recommended by CARB, and mitigation to reduce emissions from these sources is not required for the Project. • Diesel idling: CARB recommends the City incorporate measures to limit on-site diesel idling by trucks and support equipment to no longer than two minutes. This recommendation is not consistent with comment B-4, in which CARB states some trucks can idle for hours at a time and recommends the City evaluate idling emissions by assuming a minimum of 30 minutes of idling per truck. As described in response to comment B-4, trucks that access the site would be subject to company policies that limit idling of fleet-owned and third-party trucks to no more than 5 minutes and 15 minutes, respectively, under most conditions. These policies would be augmented by Mitigation Measure AIR-2E, which requires the applicant to post clear signage identifying on-site idling restrictions, including requirements to turn off primary diesel engines when not in use and to otherwise comply with the idling limitations in Title 13 of the California Code of Regulations, Section 2485. Thus, the combination of existing company wide-policies and mitigation requirements would ensure on-site diesel truck idling would be limited to the minimum amount necessary. Therefore, additional mitigation to limit on-site truck idling is not required for the Project. Furthermore, as noted above, the proposed Project would not involve the use of diesel-fueled off-road equipment that would require idling limitations. • Use of non-diesel generators: CARB recommends the City incorporate measures to require the use of non-diesel generators; however, the results of the revised HRA prepared for the Project (see FEIR Chapter 3, Errata) indicate the proposed Project would not result in significant adverse health risks from diesel PM and other toxic air contaminants. Therefore, mitigation measures

ID	Response to Comment Letter B – California Air Resources Board
	are not necessary to reduce or avoid a significant impact. In addition, from a technical standpoint, the applicant has indicated that the use of non-diesel fueled backup generators, such as those powered by natural gas, are not feasible as they rely on a gas line, which can be disrupted during natural disasters or other emergencies, and that diesel generators are preferred due to their higher power output, better fuel efficiency, and greater reliability than non-diesel generators. Finally, CARB recommends the Project include rooftop solar panels to the extent feasible. As described in the DEIR (pp. 4.6-31 and 4.8-33), the proposed Project design minimizes all roof areas shaded by natural and external structures and occupied by building system infrastructure. This maximizes the available solar access roof area and supports the Project's battery energy storage system. Thus, the proposed Project already maximizes the installation of solar panels on Project buildings, and additional mitigation is not necessary to reduce the Project's electricity consumption. The Project solar system will be specified as a 1.7 megawatt rooftop solar system with 2.8 gigawatt-hours estimated annual production supported by a 2 megawatt battery energy storage system (BESS) to store electricity from the solar system during the nighttime per a 2023 Reyes Rancho Roof Proposal by Motive Energy.
B-9	CARB provides conclusionary remarks reiterating its concern for the Project's air quality and public health impacts, the need for the EIR to justify modeling assumptions related to truck trip lengths, idling times, and use of TRUs, and the need for the Project to use ZE technologies at the start of operations. The City appreciates CARB's review of the DEIR. As described in response to comments B-2 to B-8, the EIR's air quality analysis incorporated justifiable, fact-based assumptions regarding truck trip lengths and idling times, and has been revised to address TRU operations as suggested by CARB. The results of the revised air quality analysis, which are presented in FEIR Chapter 3, Errata, indicate the proposed Project would continue to result in significant and unavoidable impacts to regional air quality, but would not result in significant health risk impacts nor significantly exacerbate existing adverse air quality conditions. Accordingly, the City has incorporated feasible mitigation measures into the EIR that reduce regional air quality emissions impacts that are commensurate with CARB suggestions and recommendations.

References added by inclusion in Responses to Comments in Letter B

CARB, 2021. EMFAC2021 Volume III Technical Document. Version 1.0.0. Sacramento, CA. March 31, 2021. <https://ww2.arb.ca.gov/sites/default/files/2021-03/emfac2021_volume_3_technical_document.pdf>

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SCAQMD, 2008. Final Localized Significance Threshold Methodology Document. Diamond Bar, CA. July 2008. < https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf?sfvrsn=8c641d61_2 >

U.S. EPA 2025. Smartway Program Highlights for 2024. December 2024. < <https://www.epa.gov/system/files/documents/2024-12/420f24041.pdf> >

COMMENT LETTER C – STATE WATER RESOURCES CONTROL BOARD (SWRCB)



LETTER C



State Water Resources Control Board

June 12, 2025

Sean McPherson and Claudia Vargas
 Rancho Cucamonga
 Planning Department
 10500 Civic Center Drive
 Rancho Cucamonga, CA 91730

RANCHO CUCAMONGA (CITY) ENVIRONMENTAL IMPACT REPORT (EIR) FOR
 THE EL CAMINO PROJECT (PROJECT), STATE CLEARINGHOUSE # 2023080369

Dear Sean McPherson and Claudia Vargas:

Thank you for the opportunity to review the EIR for the proposed Project. The State Water Resources Control Board, Division of Drinking Water (DDW), issues domestic water supply permits under the Safe Drinking Water Act. This Project falls under DDW's San Bernardino District jurisdiction. The San Bernardino District issues permit amendments according to Title 22 California Code of Regulations chapter 16. Public water systems need a permit amendment for modification of the water supply including new sources, new reservoirs with 100,000-gallon capacity or greater, service area expansions of twenty percent or more, and treatment design capacity or process changes as per Cal. Code Regs. § 64556. The Cucamonga Valley Water District (CVWD) will need to apply for an amendment for the new drinking water source (well) and treatment changes, as needed.

C1

The State Water Board, DDW, as a responsible agency under the California Environmental Quality Act (CEQA), has the following comments on the EIR:

- Under 3.7 Intended Uses of this EIR, State and Regional Agencies, please include "State Water Resources Control Board, Division of Drinking Water for approval of a domestic water supply permit amendment of a new source and possible treatment changes (Cal. Code Regs. § 64556)."
- Please discuss if the Project will include any treatment. If so, please discuss the possible treatment location, infrastructure, and impacts in the EIR.
- On PDF page 425 the EIR states that Rancho Cucamonga Municipal Utility will operate and maintain the well. This seems to be an error as the EIR also indicates ownership of the well would transfer to CVWD (PDF page 81) and access would be limited to CVWD District employees (PDF page 587).

C2

C3

C4

E. JOAQUIN ESQUIVEL, CHAIR | ERIC OPPENHEIMER, EXECUTIVE DIRECTOR

1001 I Street, Sacramento, CA 95814 | Mailing Address: P.O. Box 100, Sacramento, CA 95812-0100 | www.waterboards.ca.gov

Sean McPherson and Claudia Vargas - 2 -

June 12, 2025

Once the CEQA process is completed, please forward the following items in support of CVWD's permit application to the State Water Board, DDW San Bernardino District at DDW-SanBernardinoFO@waterboards.ca.gov:

- The EIR and Mitigation Monitoring and Reporting Plan (MMRP);
- The Resolution or Board Minutes certifying the EIR, adopting the MMRP, and approving the Project; and
- The date stamped Notice of Determination filed at the County Clerk's Office and the State Clearinghouse.

C5

Please contact Lori Schmitz of the State Water Board at (916) 449-5285 or Lori.Schmitz@waterboards.ca.gov, for questions regarding this comment letter.

Sincerely,

 Digitally signed by Lori Schmitz
Date: 2025.06.12 14:39:55 -07'00'

Lori Schmitz
Environmental Scientist
Division of Financial Assistance
Special Project Review Unit
1001 I Street, 16th floor
Sacramento, CA 95814

Cc:

State Clearinghouse

Wei Chang
District Engineer
San Bernardino District

Daniel White
Water Resources Control Engineer
San Bernardino District

ID	Response to Comment Letter C – State Water Resources Control Board
C-1	The City understands the roll of the SWQCB and its Division of Drinking Water (DDW) in the protection of water supplies and water quality in the state. The City also understands the Cucamonga Valley Water District will need to apply for an amendment to the DDW for the new service well proposed on the Project site. Therefore, the following information will be added to Section 4.19, <i>Utilities and Service Systems</i>, as outlined in Section 3.0, Errata of the Final EIR (<u>additional text shown in underline</u>, text to be deleted shown in ~~strikeout~~): <u>Relative to the new water well, the CVWD will need to apply to the State Water Resources Control Board, Division of Drinking Water (DDW), for approval of a domestic water supply permit amendment of a new source (well) and possible treatment changes per Cal. Code Regs. § 64556. [DEIR Section 4.19.4, Utilities, Impacts and Mitigation (Water), page 4.19-13, paragraph 2]</u> In addition, similar information will be included in DEIR Section 3.7, Intended Uses of the EIR, as shown in Response C-2 below.
C-2	The following information will be added to the DEIR indicating that the State Water Resource Control Board will, as a Responsible Agency, use the EIR to support approvals related to the potable water well. Specific changes are provided in Section 3.0, Errata, of the Final EIR (<u>additional text shown in underline</u>, text to be deleted shown in ~~strikeout~~): DEIR Section 3.7, Intended Uses of the EIR State and Regional Agencies <u>State Water Resources Control Board, Division of Drinking Water for approval of a domestic water supply permit amendment of a new source and possible treatment changes (Cal. Code Regs. § 64556).</u>
C-3	According to the CVWD, the water from the future groundwater well will be pumped by the well, then transferred via the new transmission line to the existing CVWD reservoir located off-site northeast of Cleveland Avenue/7th Street east of the project site. At that point, the water from the new well would be combined with existing CVWD supplies and would be chlorinated in this reservoir as part of the existing and ongoing water treatment process. Water quality from the future well is anticipated to be similar to existing CVWD wells in the vicinity which meets water quality standards and do not require treatment. There are no additional regional water treatment facilities or processes anticipated to be added by CVWD to incorporate the new well water into its regional water supply system. Therefore, the EIR did not need to evaluate any potential impacts in this regard.
C-4	The reference to ownership and maintenance of the well on DEIR PDF page 425 is incorrect and will be modified to CVWD as shown below (<u>additional text shown in underline</u>, text to be deleted shown in ~~strikeout~~) and will be incorporated into Chapter 3, Errata, of the Final EIR under Section 4.19, Utilities and Service Systems (Water): <u>Cucamonga Valley Water District</u> ~~Rancho Cucamonga Municipal Utility~~ will operate and maintain the well.

ID	Response to Comment Letter C – State Water Resources Control Board
C-5	Once the CEQA process is completed, the following items in support of CVWD's permit application (see Response C-1 above) to the State Water Board, DDW San Bernardino District at DDW-SanBernardinoFO@waterboards.ca.gov: • The EIR and Mitigation Monitoring and Reporting Plan (MMRP); • The Resolution or City Minutes certifying the EIR, adopting the MMRP, and approving the Project; and • The date stamped Notice of Determination filed at the County Clerk's Office and the State Clearinghouse.

COMMENT EMAIL D - SOUTHERN CALIFORNIA GAS COMPANY (SCGC or SoCalGas)

2.0 Response to Comments

4/30/25, 2:52 PM

FW: El Camino Project SCH No. 2023080369 - knorton@migcom.com - Moore Iacofano Goltzman Inc Mail

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Azusa Temple EIR Add

Baldwin Park HE

Banning Point

BENEPASS-CIGNA

Cameron EBS

Chino Hills misc

Clayton GP EIR

CM Fairview Park

Commerce ESA Review

Hi Sean,

Thank you,

Claudia Vargas | Associate Planner

7 Rancho Cucamonga | Planning Department

909-477-2750 ext. 4312

avargas@dtvofrc.us | www.dtvofrc.us

From: Liao, William <WLiao@soocalgas.com>

Sent: Tuesday, April 29, 2025 9:33 AM

To: Mopherson, Sean <Sean.McMopherson@dtvofrc.us>; Vargas, Claudia <Claudia.Vargas@dtvofrc.us>

Cc: SOG SE Region Redlands Utility Request <SOGSERegionRedlandsUtilityRequest@semmcrautilines.com>

Subject: El Camino Project SCH No. 2023080369

CAUTION: This email is from outside our Corporate network. Do not click links or open attachments unless you recognize the sender and can confirm the co

Hi Sean, Hi Claudia,

My name is Will Liao, I am the Region Planning Supervisor for SoCalGas. I received your Notice of Availability for the El Camino Project, SCH No. 2023080369.

We have existing facilities along all four named streets, as well as existing services for the existing structures.

Please help us ensure everyone's safety and have the builder contact 811 prior to any demolition and/or excavation activities so we can get out to Locate & Mark out our facilities.

If the builder requires alterations to our facilities, or if they require new gas service, please have to reach out to our Builder Services team to begin the application process as soon as p

SoCalGas.com.

Also, please ask builder to share any construction plans with us so we can review for potential conflicts with our existing facilities. Any required alterations will have to go through our p

anywhere between three to nine months from planning to end of construction depending on the complexity of the work involved

D1

<https://mail.google.com/mail/u/0/#inbox/FMfcgzQbdrWCWQRvdZxjCtmcWFGwdVjs>

1/1

ID	Response to Email D – Southern California Gas Company
D-1	The City understands SoCalGas has natural gas facilities in all four streets bordering the Project site as well as to the existing buildings on the site at present. The City and the developer/applicant will contact 811 and/or DigAlert to identify the locations of existing gas lines prior to demolition and new construction on the Project site. The information from this email will be added to FEIR Chapter 3, Errata, to modify Section 4.19, Utilities and Service Systems, of the Draft EIR. The developer/applicant and/or the City as appropriate will reach out to the SoCal Gas Builder Services team to begin the application process for this project following certification of the EIR and approval of the requested land use entitlements. This information will be added to Section 4.19, <i>Utilities and Service Systems</i>, regarding natural gas service. (See FEIR Chapter 3, Errata).

COMMENT LETTER E – CUCAMONGA VALLEY WATER DISTRICT (CVWD)



LETTER E

10440 Ashford Street, Rancho Cucamonga, CA 91730-2799
P.O. Box 638, Rancho Cucamonga, CA 91729-0638
(909) 987-2591 Fax (909) 476-8032

John Bosler
Secretary/General Manager/CEO

June 12, 2025

Sean McPherson
Claudia Vargas
City of Rancho Cucamonga Planning Department
10500 Civic Center Drive
Rancho Cucamonga, CA 91730

Dear Mr. McPherson and Ms. Vargas,

Thank you for the opportunity to provide comment on the El Camino Project Draft Environmental Impact Report. Cucamonga Valley Water District will be providing retail water and sewer collection services for the El Camino project which includes the construction of a groundwater supply well and associated transmission pipeline. These projects are included in the Draft Environmental Impact Report and are described in the Well Siting Study, prepared by Kear Groundwater and included in Appendix L-2, along with the Water Supply Assessment, prepared by Dudek, which is included in Appendix L-1.

E1

The District respectfully requests that the Well Siting Study and the Water Supply Assessment be replaced with the most current documents, which are attached to this letter to fully reflect the most up to date information. The District also requests inclusion of the Preliminary Engineering Design Report for the groundwater well which describes the targeted groundwater well capacity of 2,253 gallons per minute. We would also like to clarify that the groundwater well will be owned and operated by the District after construction.

E2

E3

E4

Thank you for your consideration and we are always available if you have any questions.

Sincerely,

Amanda Coker, PE
Engineering Manager
Cucamonga Valley Water District

Randall James Reed
President

James V. Curatalo, Jr.
Vice President

Mark Gibboney
Director

Kevin Kenley
Director

Jimmie Moffatt
Director

ID	Response to Comment Letter E – Cucamonga Valley Water District
E-1	The City acknowledges the new groundwater well and transmission line are included in the improvements listed in DEIR Section 3.0. Project Description, and that these improvements are also included in the technical studies cited in the comment.
E-2	The City acknowledges the Well Siting Study (WSS) and the Water Supply Assessment (WSA) were updated prior to release of the Draft EIR. The WSS used in the DEIR was dated 4/2023 but was updated on 12/18/2023. The WSA used in the DEIR was dated 5/2023 but was updated in 8/2023. The updated reports are included as FEIR Appendices B and C. The updated WSS did not have substantive changes relative to the well design compared to the earlier version other than the maximum well output was recalculated to 2,253 gallons per minute (gpm) from 1,270 gpm so several minor DEIR text changes are needed. In addition, the updated WSA did have some updated changes relative to the Project's water supply compared to the earlier version. Therefore, the discussion of water supply relative to these two studies will be modified slightly as shown below and in Section 3.0, Errata, of the Final EIR. Section 4.10.4, Hydrology & Water Quality, Impacts & Mitigation, page 4.10-17 The Project involves construction and operation of a new domestic water well for CVWD. According to CVWD staff¹⁶, this well will be drilled to a depth of 1,200 feet and is expected to supply the District with <u>2,253</u> ~~1,270~~ gallons of water per minute (gpm). A New Well Preliminary Report¹³ was also prepared for this CVWD well by Kear Groundwater dated <u>December 18, 2023</u> ~~April 28, 2023~~. The Project is constructing the new CVWD well onsite to help improve supply and reliability of the entire CVWD water system consistent with its 2020 UWMP. Section 4.10.4, Hydrology & Water Quality, Impacts & Mitigation, page 4.10-18 A Water Supply Assessment⁷ (WSA) prepared by Dudek in <u>August 2023</u> ~~May 2023~~ estimates the existing water demand for the Project site is 610.4 acre-feet per year (AFY, 1 AF = approximately 326,000 gallons) that is currently utilized for manufacturing, office uses, irrigation and bottled beverage distribution. Section 4.19.4, Utilities, Impacts and Mitigation, page 4.19-14 <i>Table 4.19-1 (see modified table numbers in Chapter 3, Errata)</i>
E-3	The City acknowledges the updated Preliminary Engineering Design Report for the groundwater well dated 12/18/23 describes the targeted groundwater well capacity of 2,253 gallons per minute (gpm). The DEIR cited a slightly older version of the study (4/2023) which stated 1,270 gpm was the well capacity. The updated engineering report is included as FEIR Appendix D. Therefore, Chapter 3, Errata, of the Final EIR will acknowledge this change as in Response E-2 above.
E-4	The reference to ownership and maintenance of the well on DEIR PDF page 425 (DEIR page 4.19-2) is incorrect and will be modified to CVWD as shown below (<u>additional text shown in underline</u>, text to be deleted shown in ~~strikeout~~): <u>Cucamonga Valley Water District</u> ~~Rancho Cucamonga Municipal Utility~~ will operate and maintain the well.

COMMENT LETTER F – SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD)



SENT VIA E-MAIL:

LETTER F

June 13, 2025

sean.mcpherson@cityofrc.us

Sean McPherson, Principal Planner
City of Rancho Cucamonga
10500 Civic Center Drive
Rancho Cucamonga, CA 91730

**Draft Environmental Impact Report (EIR) for the
El Camino Project (Proposed Project)
(SCH No: 2023080369)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to review the above-mentioned document. The City of Rancho Cucamonga is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff has provided a brief summary of the project information and prepared the following comments which are organized by topic of concern.

Summary of Proposed Project Information in the Draft EIR

Based on the Draft EIR, the El Camino Project is a proposed development in the City of Rancho Cucamonga initiated by a private company, Lone Oak – Rancho LLC. It involves the expansion of an existing beverage distribution facility into a site that will also include production and bottling capabilities, along with expanded warehousing and distribution.

The project site, a 30.1-acre property located in the southern area of the City of Rancho Cucamonga in southwestern San Bernardino County, is bounded by 7th Street to the north, Utica Avenue to the east, 6th Street to the south, and Haven Avenue to the west. The site is near major transportation routes, approximately 1.8 miles west of the I-15 Freeway and 1.2 miles north of the I-10 Freeway. The site consists of eight contiguous Assessor Parcels.

Under existing conditions, the southern and northern portions of the site (approximately 17.9 acres) are developed, while the central portion (12.2 acres) is vacant and was formerly a vineyard. Specifically, the southern parcels contain an operating beverage distribution facility, two office buildings, and support infrastructure totaling 208,590 square feet. The northern parcels contain an existing 62,210 square foot warehouse. The total existing building area is 270,800 square feet. The site is in an urbanized area surrounded by land uses typical of urban and suburban areas, including warehousing, commercial, medical offices, hospitality, and professional offices.

The Proposed Project would demolish up to 237,895 square feet of existing buildings and construct approximately 1,054,541 square feet of new manufacturing, light industrial, and office space. Major new facilities include a Production Center (PC), a Distribution Center (DC), and an Automated Storage and Retrieval System (ASRS). A new four-story, 335,475-square-foot parking structure and truck deck would be located southwest of the PC building. Building heights would

F1

Sean McPherson, Principal Planner

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June 13, 2025

range from 34 to 131 feet, with the tallest (the ASRS) requiring a Master Plan due to exceeding current zoning height limits. Additional infrastructure improvements and new features include:

- Construction of a new groundwater supply well at the southeastern corner of the site with a 2,700-foot new water transmission line to the site's existing reservoir. Raw groundwater would be chlorinated and stored onsite in the existing reservoir until it is transferred to offsite to the Coachella Valley Water District (CVWD).
- Installation of a new cogeneration (Cogen) microgrid facility comprised of two natural gas engines, each rated at 2,146 brake horsepower. The Cogen facility is designed to produce 24,656 megawatt-hours of electricity annually while recovering the waste heat from electricity production, capturing the carbon dioxide (CO₂) from the engine exhaust, and purifying it for beverage-grade use. The Cogen facility would reduce the need for trucked-in supplies of CO₂ needed to produce carbonated beverages.
- Installation of two new diesel-fueled emergency standby engines, each with a rating of 2,011 brake horsepower. Their primary function would be for monthly testing and operation during emergencies or sustained power outages when the cogeneration system is not in use or operating at reduced loads.
- Installation of up to three new vertical exhaust towers for the Cogen facility to be integrated into the parking deck design, and would not extend above the maximum building heights of the overall project
- Installation of new a rooftop solar (approximately 2.8 MWh/year) grid with a 2,000-kW battery energy storage system to provide electricity to support the Proposed Project.
- Installation of new electric vehicle (EV) charging infrastructure that will be accessible by passenger and freight vehicles.

F1

Project development is planned in two phases:

- Phase 1 includes construction of the core facilities (PC, DC, ASRS, parking structure), the groundwater well and water transmission line, and other site-wide infrastructure.
- Phase 2 focuses on the northern 3.89 acres and poses two potential scenarios: reuse the existing warehouse building (Phase 2A) or demolish it and construct a new one (Phase 2B). The Cogen facility would also be constructed and become operational during Phase 2.

South Coast AQMD Comments

Import and/or Export Information During Construction

The construction activities include demolition, site preparation, grading, building construction, paving, and the application of architectural coatings.¹ According to the Draft EIR, grading for Phase 1 would require the import of approximately 122,000 cubic yards of soil to establish the necessary pads and elevations. Additionally, Phase 2B would involve the export of approximately 16,200 cubic yards of material for construction of a new building. In addition, the Draft EIR indicates that construction of a new groundwater well to support Phase 1 would generate

F2

¹ Draft EIR, Table 3-3, P. 3-45.

approximately 3,965 cubic yards of debris and soil to be hauled away for off-site disposal.² However, the CalEEMod modeling reflects a slightly lower quantity of soil and debris (e.g., 3,770 cubic yards) that would be generated by the construction of the groundwater well.³

Furthermore, the Draft EIR states that the Mid-Valley Landfill in Rialto will be the primary disposal site for construction waste, with San Timoteo Landfill in Redlands and El Sobrante Landfill in Corona serving as secondary and backup facilities in the event of closures due to high wind conditions.⁴ Despite this, the CalEEMod analysis relies on a default haul distance of 20 miles for waste disposal. Given that both San Timoteo and El Sobrante landfills are located approximately 30 miles from the project site, the use of the default 20-mile distance underestimates potential emissions associated with hauling construction waste.

F2

The Lead Agency is recommended to revise the calculations and revise the Draft EIR to:

1. Reflect the maximum total volume of material anticipated to be removed as part of constructing the new groundwater well; and
2. Update the haul truck distances to reflect the maximum potential haul trip distances to the to the San Timoteo or El Sobrante landfill, whichever is greater.

Localized Significance Thresholds Analysis

The localized significance threshold (LST) analysis in the Draft EIR appears to incorrectly rely on the LST screening tables to determine the significance of localized air quality impacts. As indicated in Table 3-2 of the LST methodology,⁵ these screening tables are not applicable for projects larger than five acres. Since the Proposed Project site size is 30.1 acres, involves the use of large combustion sources and is located in close proximity to sensitive receptors, reliance on the LST screening tables may underestimate localized air quality impacts. Therefore, it is recommended that the Lead Agency conduct project-specific dispersion modeling to assess the localized air quality impacts from both the construction and operational phases of the Proposed Project accurately and include the results in the Final EIR.

F3

Warehouse Cold Storage Land Use and the Associated Emissions from Transport Refrigeration Units (TRUs)

The project description in the Draft EIR indicates that 1,000 square feet of warehouse space will be designated for cold storage and the use of diesel-fueled Transport Refrigeration Units (TRUs) on-site will be prohibited. Instead, all TRUs operated at the facility will be required to be electrically powered.⁶ However, the Draft EIR does not quantify the number of TRUs anticipated to be used. Cold storage facilities typically attract a higher volume of trucks and trailers equipped with TRUs compared to standard warehouse operations. As such, the Final EIR should: 1) include an estimate of the number of TRU-equipped vehicles expected during project operations; 2) clarify how the all-electric TRU requirement will be implemented, monitored, and enforced; 3) disclose whether any flexibility or exceptions are allowed (e.g., for power outages, equipment failure, or tenant operations); 4) evaluate potential TRU emissions if enforcement is not feasible or electric-only operations are not feasible in all scenarios; and 5) calculate the cancer risk or health impacts associated with these TRUs.

F4

² Ibid. p. 4.3-33.

³ Appendix C1.2, p. 166

⁴ Draft EIR, p. 4.19-2

⁵ Draft EIR, p. 4.3-36.

⁶ Draft EIR, p.2-25.

Truck Idling Mitigation and Emissions Modeling

The mitigation measures and modeling assumptions related to truck idling appear to be inconsistent in the Draft EIR. Specifically, Mitigation Measure AIR-2B states that idling of diesel-powered construction equipment, vendor delivery trucks, and hauling trucks will be limited to two minutes. However, the operational emissions modeling assumes 15 minutes of idling per truck per day. In any case, the two-minute idling limit may not be operationally feasible given the size and configuration of the facility, which includes multilevel loading docks and high truck volumes. The Final EIR should clarify how this measure will be enforced and whether it reflects realistic operational conditions.

F5

In addition, the 15-minute truck idling assumption may underestimate actual idling activity for a facility of this scale. The Lead Agency is recommended to revise the modeling analysis to reflect at least 30 minutes of idling per truck per day to provide a more realistic estimate of the potential diesel particulate matter (DPM) emissions. To ensure consistency and accuracy, the Final EIR should reconcile the mitigation measures with the assumptions relied upon in the emissions modeling and provide justification for the assumptions used.

Verification of Truck Trip Distance Assumption Used in Emissions Modeling

The analysis of truck trips in the Draft EIR assumes a 37.8-mile one-way trip distance without providing supporting evidence for the basis for the selected trip origins and destinations, the proportion of trips by truck type, or whether these trips reflect actual routes commonly used by the facility's current or future fleet. Given the importance of applying an accurate trip distance which is necessary when estimating mobile source emissions, particularly DPM and greenhouse gases (GHGs), the Final EIR should include documentation which explains why the 37.8-mile average trip distance was applied. The documentation may include empirical data, fleet-specific routing patterns, or information on major origin-destination points (e.g., ports, regional warehouses, distribution centers), for example. Also, if the trip distances include port-related activity, that information should be explicitly stated, and the trip distance should reflect the actual mileage between the facility and the port(s). Absent such documentation, the Lead Agency is recommended to either revise the trip distance assumption and recalculate the associated emissions or provide additional evidence demonstrating that the modeled distance is representative of actual or reasonably foreseeable operations.

F6

Potential Underestimation of Cancer Risk Calculations and the Ground-Level Pollutant Concentrations Near Buildings in Health Risk Assessment

For the health risk assessment (HRA) during operation, the AERMOD air dispersion modeling files did not appear to include the industrial buildings in the building downwash option, which resulted in an underestimation of the ground-level pollutant concentrations near the buildings. According to the Draft EIR, the maximum height of the tallest building (the ASRS building) would be approximately 131 feet (40 meters).⁷ Therefore, the Lead Agency is recommended to revise the AERMOD dispersion model input files to include the industrial buildings in the building downwash to analyze more accurate ground-level concentrations and include the revised HRA results in the Final EIR.

F7

⁷ Draft EIR, p.3-20.

In addition, Appendix C3.3: Health Risks,⁸ the cancer risk associated with construction and operational activities of the Proposed Project was evaluated and presented by scenario, as shown in following summary and excerpt from Appendix C3.3:

- Year 1 reflects construction activities for Phase 1 during the first year;
- Year 2 corresponds to continued construction of Phase 1 in the second year;
- Year 3 includes simultaneous operation of Phase 1 and construction of Phase 2 in the first year;
- Year 4 represents continued Phase 1 operation and Phase 2 construction in the second year; and
- Years 5 through 30 represent the full operational buildout of the Proposed Project.

Figure 1: Staff's Screenshot from Appendix C3.3

Risk Assessment at MEIR		
Scenario	AERMOD DPM Conc.	Chronic Hazard Quotient
Year 1 (P1Y1)	0.01954	0.00391
Year 2 (P1Y2)	0.01727	0.00345
Year 3 (P2Y1+Ops)	0.00503	0.00101
Year 4 (P2Y2+Ops)	0.00226	0.00045
Year 5-30 (Ops)	0.00140	0.00028

The cancer risks were estimated by following the Office of Environmental Health Hazard Assessment (OEHA) methodology, with results disaggregated by age group and exposure scenario. However, the third-trimester exposure group was only considered in the Year 1 construction scenario, and the 0–2-year age group was only included in Years 1 and 2. Notably, both sensitive receptor age groups were excluded from the operational phase (Years 3–30), during which DPM emissions continue to pose potential health risks. This limited inclusion of sensitive age groups may have resulted in an underestimation of the lifetime cancer risk associated with the Proposed Project. Given that the total excess cancer risk was reported as 8.1 in one million,⁹ the exclusion of early-life exposures during the operational phase is a substantial omission. Therefore, the Lead Agency is recommended to revise the cancer risk calculation to incorporate DPM-related impacts from the third trimester through 30 years of age for residential exposures during the operational period and include the updated analysis in the Final EIR.

Additional Explanation of the Cooling Towers as part of the Cogen Facility

As noted in the Draft EIR, the Proposed Project includes the development of a Cogen facility designed to capture CO₂ from the industrial exhaust streams for purification and reuse as beverage-grade CO₂ in carbonation processes.¹⁰ Although the detailed design of the Cogen facility has not been finalized, it appears that cooling towers will be needed. However, the Draft EIR does not contain specific information regarding the installation and operation of cooling towers, including the number of units, design specifications, or operational parameters. While the exhaust from cooling towers primarily consists of water vapor, also it may also include criteria pollutants such as particulate matter (PM₁₀ and PM_{2.5}), as well as air toxics and volatile or semi-volatile

⁸ Appendix C3.3: Health Risk, p. 2.

⁹ Ibid. p.4.3-70.

¹⁰ Ibid. p. 3-39.

Sean McPherson, Principal Planner

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compounds related to water treatment chemicals. Given the potential for low-level emissions of air pollutants from cooling towers, the Lead Agency is recommended to provide detailed information in the Final EIR about the cooling tower systems including the number, type, and capacity of the cooling towers, the use of any water treatment additives, and associated emissions. Furthermore, in accordance with South Coast AQMD Rule 222 – Filing Requirements for Specific Emission Sources Not Requiring a Written Permit Pursuant to Regulation II,¹¹ the cooling towers may be subject to registration and compliance requirements. The Lead Agency should verify whether the cooling towers qualify for exemption under Rule 219 – Equipment Not Requiring a Written Permit Pursuant to Regulation II,¹² or require registration under Rule 222 and ensure that any emissions from these sources are quantified and incorporated into the Proposed Project's total operational emissions inventory in the Final EIR.

Clarification on Meteorological Data Used in AERMOD Modeling

The Draft EIR states that AERMOD-ready meteorological data for the Ontario International Airport station was obtained from the South Coast AQMD for the five-year period spanning January 1, 2012, to December 31, 2016. However, Appendix C3.2 – AERMOD indicates that the modeling relied on the most current meteorological dataset, specifically MET dataset Version 11.¹³ To ensure consistency and transparency in the environmental analysis, the Lead Agency is recommended to revise the Final EIR to clearly state that MET dataset Version 11 was used in the AERMOD modeling.

F10

Cumulative Impacts during Operation

As set forth in CEQA Guidelines Section 15130, an EIR is required to analyze the cumulative impacts of a proposed project. According to the air quality analysis in Section 4.3 of the Draft EIR, the Proposed Project's regional operational emissions of nitrogen oxides (NOx), along with combined operational and construction-phase emissions, would exceed South Coast AQMD's regional air quality significance thresholds, even after feasible mitigation measures (MM-AIR-2C through MM-AIR-2E) are applied. The Draft EIR identifies a large volume of planned development in the surrounding region, approximately 174 projects within a five-mile radius, including over 15 million square feet of non-residential use and as such, the analysis concludes that cumulative operational air quality impacts would remain significant and unavoidable. . However, the Draft EIR does not include a detailed or project-specific analysis of how the cumulative emissions from these developments may collectively affect regional air quality or localized toxic air contaminant (TAC) exposures, particularly in communities already overburdened by environmental pollution.

F11

Therefore, the Lead Agency is recommended to include in the Final EIR: 1) a qualitative analysis of the potential cumulative air quality impacts in consideration by listing all surrounding past, present, and probable future projects; or 2) a more detailed and robust quantitative analysis of cumulative air quality impacts and potential health risk implications.

¹¹ South Coast AQMD, Rule 222 is available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/Rule-222.pdf>.

¹² South Coast AQMD, Rule 219 is available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-219.pdf>.

¹³ Draft EIR, p. 4.3-41

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

Since the Proposed Project consist of the development of 1,054,541 square feet of warehouse, once the warehouse is occupied, the Proposed Project's warehouse owners and operators will be required to comply with South Coast AQMD Rule 2305 – Warehouse Indirect Source Rule – WAIRE Program and Rule 316 – Fees for Rule 2305. Rule 2305 and Rule 316 aim to reduce regional and local emissions of NO_x and PM, including diesel PM so as to reduce adverse public health impacts on communities located near warehouses. Rule 2305 applies to owners and operators of warehouses greater than or equal to 100,000 square feet. 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 WAIRE Points on behalf of their tenants if they so 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.

F12

Therefore, the Lead Agency is recommended to review Rule 2305 to determine the potential WAIRE Points Compliance Obligation for future operators and explore whether additional project requirements, design features/enhancements, and CEQA mitigation measures can be identified and implemented at the Proposed Project that may help future warehouse operators meet their compliance obligation¹⁴. For questions concerning Rule 2305 implementation and compliance by phone or email at (909) 396-3140 or waire-program@aqmd.gov. For implementation guidance documents and compliance and reporting tools, please visit South Coast AQMD's WAIRE Program webpage.¹⁵

Additional 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, South Coast AQMD recommends incorporating the following mitigation measures and project design considerations into the Final EIR.

Mitigation Measures to Reduce Operational Air Quality Impacts from Mobile Sources

F13

1. Require zero-emission (ZE) or near-zero emission (NZE) on-road haul trucks, such as heavy-duty trucks with natural gas engines that meet the CARB's adopted optional NO_x emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr), if and when feasible.

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

¹⁴ South Coast AQMD, Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program is available. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xxiii/r2305.pdf>.

¹⁵ South Coast AQMD, WAIRE Program, is available at: <http://www.aqmd.gov/waire>.

Trucks Rule and the Heavy-duty Low NOx Omnibus Regulation, ZE and NZE trucks will become increasingly more available to 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 is 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.

F13

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.

F14

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.

F15

Lastly, the South Coast AQMD also suggests that the Lead Agency conduct a review of the following references and incorporating 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 Act¹⁶
2. South Coast AQMD 2022 Air Quality Management Plan,¹⁷ 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): Mobile Source Pollution - Environmental Justice and Transportation.¹⁸

F16

Air Quality Mitigation Measures for NOx Emissions from Construction

Given the long-range plan of the Proposed Project from 2024 to 2028, Tier 4 technology may not be the cleanest technology when construction occurs later for individual projects. According to the CARB Strategies for Reducing Emissions from Off-Road Construction Equipment, the implementation of off-road Tier 5 starting in 2027 or 2028 and the Governor’s Executive Order in September 2020 requires CARB to develop and propose a full transition to Zero Emissions (ZE) by 2035.¹⁴ Considering the scope of the Proposed Project, it is crucial to ensure that the levels of construction emissions, specifically NOx, remain less than the air quality significance thresholds during the construction period for phase. Moving towards achieving this goal, where feasible, involves opting for electric emission-free engines instead of diesel-fueled engines 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. The abatement of NOx can also be pursued by enforcing greener constructions, such as, limiting the usage of older engines in favor of adopting the latest available technologies, or even incorporating exhaust retrofits such as cutting-edge exhaust aftertreatment techniques. In addition, while the Draft EIR utilizes many South Coast AQMD’s recommended thresholds and mitigation strategies, it lacks clear discussion on whether all feasible mitigation measures relative to recent warehouse best practices have been adopted.

F17

Recommended Revision to Air Quality Mitigation Measure MM AIR-2E for Operation

The air quality analysis in the Draft EIR concludes that the Proposed Project’s regional operational emissions for NOx would remain significant even after mitigation measures are applied. The Draft EIR also states that the majority of the Proposed Project’s NOx operational emissions come from mobile sources. Once operational, the Proposed Project is anticipated to result in approximately 1,300 one-way truck trips per day. CEQA also requires that all feasible mitigation measures that

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¹⁶ 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>

¹⁷ 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>

¹⁸ United States Environmental Protection Agency (U.S. EPA), Mobile Source Pollution - Environmental Justice and Transportation. Available at: <https://www.epa.gov/mobile-source-pollution/environmental-justice-and-transportation>

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go beyond what is required by law be utilized to minimize or eliminate any significant adverse air quality impacts.

The Draft EIR contains mitigation measure MM AIR-2E which states that “To reduce truck trip emissions (i.e., light-heavy, medium-heavy, and heavy-heavy duty trucks with a gross vehicle weight of 8,501 pounds or greater) and promote the use of near-zero emission (NZE) and zero emission vehicles (ZEV), the City shall require the applicant to, ...” To further reduce the Proposed Project’s significant and unavoidable air quality impacts during operation, the Lead Agency is recommended to consider revising MM AIR-2E so that tenants which do not already operate 2014 and newer model year trucks are encouraged by the developer/successor-in-interest to apply for funding to replace the older diesel trucks with newer, less emitting trucks.

Assessment of Emissions and Operational Hours for Emergency Standby Engines

The Proposed Project involves the installation of two new emergency standby engines, each with a rating of 2,011 brake horsepower. The Draft EIR indicates that these engines are anticipated to have a non-emergency runtime of 50 hours per year for monthly testing; otherwise, these engines would only operate during emergencies or sustained power outages when the Cogen facility is not in operation or operating at reduced loads. In addition, according to Table 4 – Stationary Source Emissions Estimates of Appendix C2, and the technical files prepared by MIG, Inc., the emission calculations are based on the assumption that the emergency standby engines will be operating 50 hours per year.

It is important to note that South Coast AQMD air permits issued for emergency engines typically allow up to 50 hours per year for maintenance and testing, with a maximum of 200 total operational hours per year (including emergency use). As a result, the analysis of operational emissions for these two new emergency engines should calculate the future emissions based on the assumption of 200 hours of operation per year per unit. If fewer hours are assumed for the two new emergency engines, South Coast AQMD staff would need to include a permit condition to limit operations of these emergency engines to the hours specified in the CEQA analysis. Therefore, it is recommended that the Lead Agency revise the emissions calculations for the emergency engines to reflect the maximum allowable usage. These revisions should be incorporated into the analysis of operation emissions and the level of significance should be re-examined and updated accordingly. The revised calculations and supporting evidence should be included in the Final EIR.

F19

South Coast AQMD Air Permits and Role as a Responsible Agency

Implementation of the Proposed Project would require the use of new stationary and portable sources for which air permits from South Coast AQMD will be required. Specifically, the Draft EIR describes features of the Proposed Project including a new Cogen facility which will have two new natural gas engines and two new diesel-fueled emergency standby engines, a new groundwater well and transmission water line with chlorinated water treatment. However, the Draft EIR does not provide details or emission estimates associated with these industrial processes and equipment that will be utilized such as the engines, pumps and associated chemicals (delivery and use) for the water treatment activities. In addition, it is unclear whether a new or modified electrical transmission line to the local utility will be needed. The Lead Agency is recommended to revise the project description and analysis/calculations to include all of the construction and operation emissions associated with all of the industrial equipment plus any chemicals and their associated storage needs and delivery methods.

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In addition, the Final EIR 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,¹⁹ Rule 203 – Permit to Operate,²⁰ Rule 401 – Visible Emissions,²¹ Rule 402 – Nuisance,²² Rule 403 – Fugitive Dust,²³ Rule 1110.2 – Emissions from Gaseous and Liquid-Fueled Engines,²⁴ Rule 1113 – Architectural Coatings,²⁵ Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil,²⁶ Rule 1179 – Publicly Owned Treatment Works Operations,²⁷ Regulation XIII – New Source Review,²⁸ Rule 1401 – New Source Review of Toxic Air Contaminants,²⁹ Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants,³⁰ Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines,³¹ etc. It is important to note that when air permits from South Coast AQMD are required, the role of South Coast AQMD would change from a Commenting Agency to a Responsible Agency under CEQA. In addition, if South Coast AQMD is identified as a Responsible Agency, per CEQA Guidelines Sections 15086, the Lead Agency is required to consult with South Coast AQMD.

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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 Guidelines Section 15096(e), which could have the effect of delaying the 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. Based on the earlier comments, South Coast AQMD is concerned that the project description and analysis in its current form in the Draft EIR is inadequate to be relied upon for this purpose. For these reasons, the Final EIR 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>.

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¹⁹ South Coast AQMD, Rule 201 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>

²⁰ South Coast AQMD, Rule 203 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>

²¹ South Coast AQMD, Rule 401 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf>

²² South Coast AQMD, Rule 402 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>

²³ South Coast AQMD, Rule 403 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403>

²⁴ South Coast AQMD, Rule 1110.2 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf

²⁵ South Coast AQMD, Rule 1113 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf>

²⁶ South Coast AQMD, Rule 1166 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>

²⁷ South Coast AQMD, Rule 1179 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1179.pdf>

²⁸ South Coast AQMD, Regulation XIII is available at: <https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii>

²⁹ South Coast AQMD, Rule 1401 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf>

³⁰ South Coast AQMD, Rule 1466 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf>

³¹ South Coast AQMD, Rule 1470 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf>

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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 the environmental issues and prepare a written response at least 10 days prior to certifying the Final EIR. 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 EIR. 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.

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Thank you for the opportunity to provide 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 Jivar Afshar, Air Quality Specialist, at jafshar@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

Sam Wang

Program Supervisor, CEQA IGR

Planning, Rule Development & Implementation

BR:SW:DN:JASBC250502-10

Control Number

ID	Response to Comment Letter F – South Coast Air Quality Management District
F-1	In this comment, the SCAQMD introduces their letter and provides an accurate summary of the Project. Since the comment does not raise any specific questions or comments on the DEIR, no further response is warranted.
F-2	The SCAQMD summarizes import/export assumptions used to estimate the proposed Project's construction emissions. The SCAQMD identifies that the DEIR text (p. 4.3-33) describing the amount of soil and debris hauling for the ground water well (3,965 cubic yards) is more than the modeled value shown in the CalEEMod output file contained in FEIR Appendix H.1.2 (3,770 cubic yards). Accordingly, the SCAQMD recommends the DEIR's emissions estimates be revised to reflect the maximum amount of hauling activity that could occur for the Project. In addition, the SCAQMD identifies the DEIR (p. 4.9-17) describes both primary and secondary waste disposal sites for the Project. The primary disposal site is Mid Valley Landfill in Rialto, approximately 14 miles from the Project Site), while the secondary sites include San Timoteo Landfill in Redlands and El Sobrante Landfill in Corona, approximately 26 to 28 miles from the Project site via the shortest routes. The SCAQMD notes that the secondary land fill sites require trucks to travel farther than the assumed by the DEIR's air quality analysis (20 miles per haul trip). Accordingly, the SCAQMD recommends the DEIR's emissions estimates be revised to reflect the maximum hauling distance that could occur for the Project. As shown in FEIR Chapter 3, Errata, and FEIR Appendix H, the City has revised the CalEEMod file for the Project per the SCAQMD's recommendations. The revised modeling assumes 3,965 cubic yards of hauling during ground water well construction activities and an average trip length of 28 miles for all haul truck trips during all construction phases, which is considered a conservative assumption that is likely to overestimate regional construction emissions (because trips may ultimately go the primary landfill identified in the DEIR). This revision has been carried through into all regional emissions, health risk assessment (HRA), and energy and greenhouse gas (GHG) analyses as necessary. This revision did not result in a new or substantially more severe air quality, energy, or GHG impact than identified in the DEIR.
F-3	The SCAQMD states the DEIR's analysis of localized air quality impacts is not consistent with its recommended guidance for evaluating localized air quality impacts. Specifically, the SCAQMD notes that its guidance document recommends Project-specific air dispersion modeling be conducted to determine localized air quality impacts for Projects that are greater than five acres in size. As described in more detail below, the Draft EIR adequately analyzed localized air quality impacts. Nonetheless, the City has conducted the localized significance threshold (LST) dispersion modeling recommended by the SCAQMD and, as shown in FEIR Chapter 3, the results of this modeling have confirmed the EIR's finding that the Project would not exceed the SCAQMD's concentration-based LST standards. Thus, the proposed Project would not result in a localized air quality impact. For context purposes, the SCAQMD's localized air quality impact guidance and corresponding LSTs were developed to assist CEQA lead agencies with the analysis of a project's potential local air quality impacts. The guidance and thresholds are based on SCAQMD air quality dispersion modeling that considers local meteorological and air quality data in specific areas, called Source Receptor Areas or SRAs, and estimates the amount of air pollution that may result in a local air quality

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	impact. As the SCAQMD states, its LSTs represent “the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard (SCAQMD 2008, p. 1-1).” The SCAQMD’s modeling of potential local air pollution impacts is based on specific project sizes (e.g., 1-acre, 2-acres, 5-acres) at specific distances from a Project area (e.g., 25 meters away, 100 meters away, etc.). This approach allows for pollutants to disperse from their source according to SRA-specific conditions and distances to actual sensitive receptors. Under this approach, projects with more emissions in a smaller area result in higher concentrations and higher potential for local air quality impacts because the smaller project area limits lateral and vertical dispersion of pollutants from the project area. Similarly, projects located closer to sensitive receptors result in a higher potential for local air quality impacts because there is less distance for pollutants to disperse. The SCAQMD’s LST guidance includes screening tables that identify the total mass emissions that may be generated by a project’s construction activities, in terms of pounds per day, that may safely be assumed to not result localized air quality impact. The SCAQMD derived these mass emissions estimates from the results of the modeling used to estimate pollutant concentrations and potential exceedances of air quality standards. The SCAQMD’s screening procedures “are by design conservative, that is, the predicted impacts tend to overestimate the actual impacts. If the predicted impacts are acceptable using the LST approach presented here, then a more detailed evaluation is not necessary (SCAQMD 2008, p 4-1).” The SCAQMD screening LSTs, therefore, provide the maximum amount of emissions, in pounds per day, that can be emitted without violating concentration-based ambient air quality standards. Thus, if a Project’s emission levels are below the screening LST thresholds, those emissions will not result in a localized air quality impact. The DEIR’s LST analysis evaluated the Project’s potential criteria air pollutant emissions at sensitive receptor locations by comparing Project emissions against the mass-based LST threshold for a 5-acre project and found both Project construction and operational emissions would be below the LST thresholds. While the proposed Project site size is approximately 30.1 acres, it is important to note that construction would not be occurring on 30.1 acres at the same time. Rather, active disturbance areas would be much less on any given day. Similarly, from an operational perspective, most of the on-site truck idling and all of the stationary source emissions would come from the southeastern quadrant of the site, an approximately 7-acre area. The DEIR’s use of the SCAQMD’s 5-acre screening threshold for a Project greater than 5 acres is considered conservative because this approach assumes all emissions are generated in a smaller area (5 acres) and in much closer proximity to sensitive receptors than would actually occur. This approach is conservative (i.e., likely to overestimate local air quality impacts) because emissions generated in a larger geographic area, farther away from receptors, have more opportunity to disperse. For example, in the same source-receptor area, the SCAQMD’s mass-based screening LST thresholds are higher for a 5-acre site than a 2-acre site. This is due, in part, to the fact that emissions in the 5-acre area are spread out over a larger area and must travel further to impact a specific point outside the Project area. In a square project area totaling 2 acres in size, the distance from the center to the edge of the project area is approximately 148 feet, while the distance from the center to the edge of a square project area totaling 5 acres in size is approximately 233 feet.

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	Spreading emissions out over a larger area reduces the emissions per unit area, in terms of pounds per acre or grams per meter, and also reduces the amount of emissions dispersed to off-site areas from any given point. Nonetheless, as suggested by the SCAQMD, the City has conducted LST dispersion modeling for the Project's on-site construction and operational emission sources. The modeling is based on maximum daily emissions for each LST pollutant (NO_x, CO, PM₁₀, and PM_{2.5}), and was conducted in a manner consistent with the SCAQMD's recommended LST modeling methodology. As shown in FEIR Chapter 3, Errata, the results of the modeling indicate the proposed Project would not result in concentrations of NO_x, CO, PM₁₀, and PM_{2.5} that exceed concentration-based LST thresholds.
F-4	The SCAQMD comments that the DEIR (p. 4.3-39) describes the Project would include 1,000 square feet of cold storage space but does not provide sufficient details on TRU operations or the implementation of Mitigation Measure AIR-2E. As described in response to comment B-5, the City has clarified the DEIR's text regarding cold storage and TRU operations and revised the unmitigated HRA estimates to include the operation of two TRUs at the site for approximately two hours per month each. The inclusion of these TRU operations did not change the findings of the HRA or result in a new or substantially more severe air quality impact than identified in the DEIR. In addition, the City notes that Mitigation Measure AIR-2E, as revised, requires the applicant to power TRUs at the Project site with electricity or otherwise limit the use of diesel-fueled TRUs to no more than two trucks per month. The City has clarified this mitigation measure to address potential unanticipated conditions (e.g., power outages) as recommended by the SCAQMD, and notes that, as shown in the proposed MMRP for the Project, the requirements of all EIR mitigation measures will be incorporated into the Project's CUP (DRC-2023-00068). The inclusion of these measures in the CUP provides a legal enforcement mechanism to ensure EIR mitigation measures are implemented.
F-5	The SCAQMD states that the DEIR's mitigation measures and assumptions related to truck idling appear to be inconsistent. The SCAQMD identifies that Mitigation Measure AIR-2B limits idling of diesel-powered construction equipment, vendor delivery trucks, and hauling trucks to two minutes, while the operational emissions modeling assumes 15 minutes of idling. The SCAQMD also comments that a two-minute idling restriction may not be feasible for the Project, and that a 15-minute idling assumption may underestimate actual idling activity given the Project size. Accordingly, the SCAQMD recommends the DEIR be revised to assume up to 30 minutes of idling per truck per day and to clarify idling mitigation requirements. As a point of clarification, the DEIR contains different idling limitations for construction and operational activities because these activities are subject to different operating conditions, parameters, etc. Mitigation Measure AIR-2B is intended to reduce construction NO_x and PM exhaust emissions and limits construction equipment and truck idling to no more than two minutes unless this limit conflicts with manufacturer's specifications. Thus, the two-minute idling limitation only applies to Project construction activities; it does not apply to Project operations. In contrast, the DEIR assumes that, during Project operations, all trucks that access the site could idle for

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	up to 15 minutes per day. As described in response to comment B-4, this assumption is supported by factual evidence including company policies and maintenance logs that indicate actual on-site idling times may be less than 15 minutes. Thus, the 15-minute idling assumption assumed by the DEIR is likely to overestimate potential idling emissions and associated adverse health risks. No change to the DEIR's construction or operational emissions is warranted at this time.
F-6	The SCAQMD states the DEIR does not provide supporting evidence for the use of a 37.8-mile one-way trip distance for Project conditions and requests the FEIR include documentation supporting the use of this assumption, such as empirical data, fleet specific routing patterns, etc. The SCAQMD also requests that the DEIR be clarified to indicate if port-related trips would occur and the DEIR's analysis of truck trip emissions be revised to reflect updated mileage assumptions if necessary. As explained in detail in response to comment B-3, the DEIR (pp. 4.3-16 and 4.3-35) clearly explains one-way truck trip lengths are derived using a combination of Project-specific truck trip generation rates, inclusive of the amount of trips by light-heavy, medium-heavy, and heavy-heavy duty trucks, and SCAG and SCAQMD data on regional truck trip lengths. Furthermore, the proposed Project would not involve trips travelling back and forth between POLA/LB. The DEIR's analysis of potential emissions from truck travel is based on SCAQMD-methodology and is consistent with the existing and future trucking activity at the site provided by the applicant for this FEIR (see FEIR Appendix I). The Draft EIR's methodology and analysis of truck emissions, therefore, are substantiated, and there is no specific evidence presented by the SCAQMD to support its assertion that the Draft EIR underestimates truck emissions.
F-7	The SCAQMD asserts the DEIR underestimated health risks because AERMOD dispersion modeling did not include the industrial buildings in the building downwash option. The SCAQMD is correct. The AERMOD dispersion modeling conducted for the proposed Project HRA did not include the building downwash option. The City notes the building downwash option was not appropriate for the construction HRA because the construction HRA did not include any point sources of emissions. As shown in FEIR Chapter 3, the City has revised the operational HRA to include additional point sources (e.g., boilers, cogeneration generators) and to include the building downwash option based on the buildings shown in the DEIR's site plan (Exhibit 3-5). The results of the revised HRA and LST modeling indicate the proposed Project would not result in significant localized air quality concentrations or adverse health risk impacts at off-site receptor locations. Thus, these impacts would remain less than significant.
F-8	The SCAQMD asserts the DEIR underestimated health risks because the third trimester life stage was only exposed to Project emissions in modeled emissions Year 1 and the 0-2 age life stage was only exposed to Project emissions in modeled emissions Year 1 and 2. The SCAQMD is correct that DEIR Appendix C.3.3 only includes 3rd trimester and child (0-2 years old) age groups in certain exposure scenarios; however, the SCAQMD is incorrect that the DEIR has underestimated potential adverse health risks. As explained in the DEIR (p. 4.3-68, emphasis added), "Construction DPM emissions would be the primary driver of health risks when combining construction

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	and operational related emissions. Therefore, for the purposes of this analysis, health risks are presented for the Project's overall [Maximum Exposed Individual Receptor, or MEIR] and [Maximum Exposed Individual Worker, or MEIW] locations (i.e., the combined risks from construction and operational activities) . . . the excess cancer risk estimate at the MEIR assumes the receptor is an infant (including 3rd trimester) for the first 2 years of exposure and then develops to a child and finally to an adult over the next 28 years of exposure." As shown in Figure 1 in the SCAQMD's comment (DEIR Table 4.3-32), the modeled annual average DPM concentrations in construction years 1 and 2 are an order of magnitude higher than years 3 through 5. Thus, assuming all early life stages occur during these exposure years results in the most conservative estimate of potential adverse health risks. Nonetheless, DEIR Appendix C3.3 has been revised to include carcinogenic risk estimates assuming exposure to diesel PM begins for an individual in year 1, 2, 3, 4, and/or 5. As shown in revised Appendix C3.3, carcinogenic risk estimates remain highest when it is assumed early life stage exposure occurs in years 1 and 2 of the Project, as was done in the DEIR (see FEIR Appendix H for new modeling data).
F-9	The SCAQMD recommended adding information about the cooling towers and their associated emissions. The SCAQMD correctly summarizes the design status of the Project's cogeneration system, identifies that cooling towers may be needed for the system, and notes the DEIR does not contain sufficient information to evaluate cooling tower impacts. The SCAQMD identifies that cooling towers may be needed for the cogeneration system because the DEIR (p. 3-40) inadvertently uses this term to describe part of the Pentair CO₂ recovery system included in the system design. City clarifies that the proposed Project would not require the installation of cooling towers; rather the exhaust from the system's internal combustion engine-generators would be ducted to a selective catalytic reduction system and then into the Pentair CO₂ recovery system, which includes two adsorption units/towers (see DEIR p. 4.3-37). As shown in FEIR Chapter 3, the City has revised the DEIR to remove reference to cooling towers at the Project site and has added information on the CO₂ recovery system adsorption towers. This clarification does not substantially change the emissions information that was presented in the DEIR because the DEIR estimated criteria air pollutant and toxic air contaminant emissions based on manufacturer's data and SCAQMD default emission factors for natural gas combustion, respectively.
F-10	The SCAQMD has identified a minor discrepancy in the DEIR's description of the meteorological data use in the AERMOD modeling and recommends the FEIR clarify what meteorological data was used in the modeling. The City confirms for the SCAQMD that the DEIR and all revised dispersion modeling conducted for this FEIR (see FEIR Chapter 3, Errata) was conducted using Ontario International Airport station meteorological data, Version 11, for the date range spanning January 1, 2019, to December 31, 2023. As shown in FEIR Chapter 3, this clarification has been made to the EIR.
F-11	The SCAQMD recommends revising the Draft EIR to include a qualitative and quantitative cumulative analysis for regional air quality emissions and TAC exposure from the identified 174 Projects within a five mile radius. The SCAQMD accurately summarizes the DEIR's findings regarding regional NO_x emissions impacts, notes the DEIR identified a large volume of planned development in the surrounding region but

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	does not include a detailed analysis of how this cumulative development may affect regional air quality, and recommends the FEIR include more detailed qualitative and quantitative analysis of cumulative air quality impacts. The City directs the SCAQMD to DEIR Section 4.0, which describes the DEIR's cumulative impact analysis methodology. This section summarizes and provides cumulative project lists as well as a summary of the City's growth projections contained in Plan RC. This section also provides a good faith effort on the part of the City to provide the status for cumulative projects (i.e., whether such projects are past, present, or reasonably foreseeable). The DEIR's assessment of cumulative air quality impacts is based on this list and projection information contained in Section 4.0, as well as current SCAQMD guidance on assessing cumulative air quality impacts (see DEIR p. 4.3-74; the City notes the SCAQMD is in the process of updating its cumulative impact analyses guidance, but that this process is not complete and therefore not further addressed in the DEIR). The current guidance clearly establishes the same project- and cumulative-level thresholds for projects. The EIR, as revised (see FEIR Chapter 3, Errata), includes robust qualitative and quantitative evaluations of the Project's consistency with the 2022 AQMP, regional construction and operations emissions, localized air quality effects, and odors. The results of these evaluations show the Project would result in a significant and unavoidable conflict with the 2022 AQMP and generate regional emissions of NOX, an ozone precursor pollutant, that would be cumulatively considerable during construction and operational activities. The Project's contribution to cumulative regional air quality impacts would also be significant and unavoidable, even with the implementation of feasible mitigation measures, and regardless of the individual contributions from other projects. As shown in FEIR Chapter 3, Errata, the City has revised the discussion under Impact AIR-5 to provide additional information regarding the Project's potential cumulative air quality impacts as shown below, however, the City notes it is not necessary nor feasible for the EIR to present detailed information for all cumulative projects identified in DEIR Section 4.0: DEIR Section 4.3.5 Air Quality, Impacts and Mitigation Measures, Cumulative Impacts (Impact AIR-5) Page 4.3-74 <u>For the purposes of this cumulative air quality impact analysis, the geographic context is the South Coast Air Basin in which the Project is located. As described in Section 4, the level of expected future development in the City and surrounding areas is substantial (i.e., 174 projects in four jurisdictions with 8,362 residential units and approximately 15 million square feet of non-residential development). In addition, the City expects continued growth based on its General Plan population and housing projections. While it is possible that cumulative projects 16-18 may be under construction during the same timeframe as the Project, it is difficult to predict with any certainty due to the many factors involved in starting and maintaining construction (e.g., financing, equipment and staff availability, weather, etc.). The development of these and other development projects throughout the Basin would contribute to local and regional air quality emissions that could combine with the proposed Project's emissions.</u> In developing its CEQA significance thresholds, the SCAQMD considered the emission levels at which a Project's individual emissions would be cumulatively

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	considerable.⁵⁸³⁵ As described under <u>Impact AIR-1 and Impact AIR-2A</u>, the proposed Project would result in potentially significant VOC and NOx impacts for regional construction emissions, regional operational emissions, and combined Phase 1 operational and Phase 2B construction emissions. The Project would incorporate Mitigation Measures AIR-2A through AIR-2FAIR-2E; however, regional operational emissions for NOx as well as combined operational and construction emissions for NOx would remain above SCAQMD thresholds and have the potential <u>to conflict with the 2022 AQMP by causing or contributing to existing or future regional air quality violations.</u>~~cause or contribute to existing or future air quality violations, thus conflicting with the 2022 AQMP.~~ Thus, the proposed Project's would result in a cumulatively considerable increase in regional criteria air pollutants. This impact would be significant and unavoidable even with the incorporation of feasible mitigation measures. <u>As described under Impact AIR-3, the proposed Project would not expose sensitive receptors to substantial pollutant concentrations. Project construction and operational activities would not generate emissions that exceed SCAQMD LST thresholds at off-site receptor locations. In addition, project construction and operational activities would not generate TAC emissions that would result in adverse carcinogenic or non-carcinogenic health risks at any off-site residential, school, or employment location. Finally, the proposed Project's criteria air pollutant emissions would not significantly exacerbate or contribute to significant health risks at or in the proximity of the Project area. Thus, since the proposed Project would not result in individual pollutant concentrations that exceed SCAQMD thresholds it would not result in a cumulatively considerable contribution to pollutant concentrations at sensitive receptor locations. This impact would be less than significant. It is noted that Mitigations Measures AIR-2A to AIR-2F would serve to further reduce the less than significant magnitude of this impact through the incorporation of mitigation measures that reduce the Project's local and regional criteria air pollutant and TAC emissions levels.</u> <u>Finally, as described under Impact AIR-4, the proposed Project would not result in other emissions that would adversely affect a substantial number of people and thus would result in a cumulatively considerable contribution to impacts resulting from other emissions. This impact would be less than significant.</u>~~These impacts would be significant and unavoidable.~~
F-12	The SCAQMD states the proposed Project's 1,054,541 square feet of warehouse space would make the Project subject to Rule 2305 (Warehouse Indirect Source Rule – WAIRE Program), summarizes the requirements and fees associated with the WAIRE rule, and recommends the City determine the Project's potential compliance obligation pursuant to this rule. As described in more detail below, this comment does not provide new information for the City to consider, and the City has determined it is premature to require the Project to determine its Rule 2305 compliance obligation based on preliminary design information. The information provided by the SCAQMD is commensurate with the information provided in the DEIR (pp. 3-48 and 4.3-24), which describes Rule 2305 requirements and identifies that the Project may be subject to this rule. As a point of clarification, the DEIR (p. 3-1) describes that the proposed Project consists of 1,054,541 square feet of new manufacturing, light industrial, and office uses, not 1,054,541 square feet

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	dedicated solely to warehousing. This distinction is important, because, as noted by the SCAQMD, Rule 2305 applies to the owners and operators of warehouses greater than or equal to 100,000 square feet, with a warehouse defined by Rule 2305 as a “building that stores cargo, goods, or products on a short- or long-term basis for later distribution to businesses and/or retail customers”. Pursuant to Rule 2305, supporting office administration, maintenance, manufacturing areas, or retail sales areas open to the general public, within the same warehouse building, that are physically separate from the warehouse area, are not considered warehousing activities. As shown in DEIR Table 3-4, the proposed Project’s distribution center would total approximately 188,284 square feet. Thus, the proposed Project is likely to be subject to Rule 2305, although as a much smaller facility than assumed by the SCAQMD. Furthermore, it is premature to commit to regulatory compliance obligations at the environmental planning and review stage. There is no specific warehouse points compliance obligation that is relevant at this time and the City is not obligated to finalize the details of this regulatory compliance action in the EIR, nor would the results of a compliance obligation calculation based on preliminary Project design information be informative for the EIR analysis. For example, while the EIR has made a good faith effort to document the potential air quality impacts of the Project, the analysis is based on conceptual building design and trip generation information that may change as the Project finalizes its design. The proposed Project would, as necessary, comply with all applicable SCAQMD rules and regulations, including Rule 2305, pursuant to each regulation’s individual compliance schedule.
F-13	The SCAQMD recommends four specific mitigation measures to incorporate into the EIR to reduce operational air quality impacts from mobile sources: • The SCAQMD recommends the City require ZE or NZE on-road haul trucks “if and when feasible”. It is not clear, as written, “if and when” the SCAQMD’s recommendation would be feasible. As described in more detail in response to comment B-8, the City does not consider it feasible for the Project to require all light-, medium-, and heavy-duty trucks to be ZE vehicles from the start of operations because such technology has not yet been fully demonstrated at the distribution scale proposed by the Project and would likely require electrical demands that could not be met with existing infrastructure. The commenter’s suggestion to require ZE or NZE trucks “if and when feasible” reflects the uncertainty regarding the timeline for availability of those technologies. The DEIR does, however, include Mitigation Measure AIR-2E, which requires the Project to exceed the mandatory electric vehicle charging readiness requirements for planned off-street loading spaces, which would result in the installation of electric vehicle service equipment at 10% of the total truck docks included in the final Project design and ensure all remaining docks have the infrastructure to support future electrification as ZE truck technology becomes more common. In addition, as shown in Chapter 3, Errata, the City has added a requirement to Mitigation Measure AIR-2E requiring the Project to use at least 8 ZE or near ZE on-road trucks in its proprietary vehicle fleet within the first year of operations after receiving a certificate of occupancy. Finally, the City has also modified Mitigation Measure AIR-2E to include a requirement to provide third-party trucking operators that access the site using diesel-fueled trucks information on the HVIP incentive

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	program, which provides point-of-sale vouchers for ZE vehicles to accelerate the deployment of such technologies. • The SCAQMD recommends the City require a phase-in schedule to incentivize the use of cleaner operating trucks. The suggested measure is uncertain because it is unclear when the technology will be readily available and there is uncertainty regarding the State's ability to mandate the deployment of ZE trucks (see response to comment B-8). An incentive program without specific mandates lacks a performance standard, and is not effective CEQA mitigation. As noted above, the DEIR, as revised, includes measures that will require the use of eight ZE or NZE trucks within one year after receiving a certificate of occupancy and support the implementation of ZE or NZE technologies. It would, for instance, install ZE charging infrastructure that allows for the immediate use of limited ZE trucks and supports the expansion of this technology over time. • The SCAQMD recommends the City limit the daily number of trucks allowed at the Project site to levels analyzed in the EIR and commit to re-evaluating the Project through CEQA prior to allowing higher activity levels. This suggestion does not reduce the Project's mobile source emissions and is not warranted for the Project. The Draft EIR made realistic, but conservative (i.e., likely to overestimated) assumptions about the proposed Project's potential passenger vehicle, truck traffic, and air quality and GHG emissions impacts, and there is no evidence at this time to indicate the Project will exceed the activity levels or emissions estimates presented in this FEIR. The City will evaluate future Project actions, if and when such actions are proposed, for consistency with the information contained in this EIR. If such actions are inconsistent with the assumptions in the EIR (or would result in new or greater significant impacts), the City would evaluate the action in accordance with the requirements of CEQA. • The SCAQMD recommends the City require electric vehicle charging stations or, at minimum, provide electrical infrastructure to support electric vehicle technologies, including electrical hook ups for truck auxiliary engines. The City notes that Mitigation Measures AIR-2C and AIR-2E require the Project to implement Voluntary Tier 1 electric vehicle charging provisions specific by the CalGreen code for light duty vehicles and to exceed the CalGreen Codes mandatory EV charging readiness requirements for planned off-street loading spaces. Furthermore, Mitigation Measure AIR-2E, as revised, requires the applicant to power TRUs at the Project site with electricity or otherwise limit the use of diesel-fueled TRUs to no more than two trucks per month. Thus, the EIR already incorporates electric vehicle charging mitigation requirements commensurate with this comment.
F-14	The SCAQMD recommends three specific mitigation measures to incorporate into the EIR to reduce operational air quality impacts from other area sources: • The SCAQMD recommends the City maximize the use of solar energy by installing solar energy arrays. The City notes that the proposed Project would be required to comply with the prescriptive or performance-based requirements of the State's Building Energy Efficiency Standards (Title 24

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	Energy Code) for Climate Zone 15 in effect at the time the application is submitted. These standards already require the installation of solar photovoltaic systems for most non-residential Projects. As described in more detail in response to comment B-8, the proposed Project has maximized solar access roof areas and will install a 1.7-megawatt capacity rooftop solar photovoltaic (PV) system that is estimated to produce 2.8-gigawatt hours of electricity annually. The solar PV system would be supported by a 2-megawatt battery energy storage system that would store and provide power to the Project during periods when solar power generation is not occurring. Therefore, the proposed Project already includes design features that are commensurate with this SCAQMD recommendation. • The SCAQMD recommends using light-colored paving and roofing materials. The City notes that most of the Project site would be paved with concrete, a light-colored paving material (as opposed to bituminous asphalt). Furthermore, the proposed Project and Title 24 Energy Code already include design guidelines and requirements commensurate with this measure. For example, the building code establishes minimum solar reflectance index values for non-residential buildings (24 CCR, Section 10-113, Mandatory Certification and Labelling of Roofing Product Reflectance and Emittance), as well as reflective requirements for building envelopes (Section 140.3(a)1). Furthermore, Mitigation Measure GHG-2 requires all building envelope and systems components covered by Title 24 to be designed to have a total energy design rating that is at least 5% less than the standard building design for Climate Zone 15, unless the City has adopted local requirements that are more stringent than the Energy Code. Thus, existing building code requirements already require measures commensurate with the SCAQMD's recommendation. • The SCAQMD recommends the City require the Project to use only Energy Star heating, cooling, and lighting devices and appliances. The City notes DEIR mitigation measure GHG-1 already requires the refrigerators, dishwashers, clothes washers, etc. intended for employee use to be Energy Star certified products. Thus, the DEIR already includes a measure commensurate with the SCAQMD's suggestion. The City has reviewed the SCAQMD's suggestion and has incorporated some of the SCAQMD's suggested mitigation measures while others were determined to be infeasible relative to the proposed Project.
F-15	The SCAQMD recommends five specific Project design considerations to incorporate into the EIR to reduce emissions of air quality pollutants and potential health risk impacts. As a point of clarification, the DEIR, as revised in FEIR Chapter 3, concludes that localized air quality impacts would be less than significant. The DEIR, as revised in FEIR Chapter 3, also concludes that the Project would not result in significant adverse health risks to any sensitive residential, student, or worker receptor. Thus, since the EIR already concludes that potential local air quality and health risk impacts would be less than significant, additional mitigation is not required to address this impact. Nonetheless, the City has reviewed the SCAQMD's suggested design features and determined:

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	• Signage: As described in the DEIR (p. 4.17-1), the two main streets that border the Project area, 6th Street and Haven Avenue, are both City-designated truck routes. Furthermore, as described in the DEIR, Appendix K-2 (Figure 9), the transportation impact study (TIS) prepared for the Project assumes that 100% of industrial truck traffic would use Haven Avenue to access the Project area and site. Thus, given the City's existing truck route conditions that prevail in the Project area and the proposed Project design, trucks will not unnecessarily travel next to or near sensitive receptors that are not already located along City-designated truck routes. The SCAQMD's suggestion, therefore, would not further reduce local air quality or health risk impacts at sensitive receptor locations. • Truck entrances, exits, and check points: The DEIR (p. 3-25) describes site access and circulation. All trucks would enter on 7th Street and exit the site on 7th Street or Utica Avenue, and check points would be situated approximately 300 feet on the interior of the site, at least 500 feet from all sensitive receptors. In addition, each entry point would include two ingress and two egress lanes to ensure no trucks queue outside the facility. The southern driveway on Utica Avenue, which would be used for truck egress only, is approximately 550 feet from the sensitive daycare receptor identified in the DEIR (p. 4.3-11), and trucks travelling south on Utica Avenue to access 6th Street and Haven Avenue would pass by this receptor; however, the HRA conducted for the Project, as revised by this FEIR (see FEIR Chapter 3, Errata), shows the total combined construction and operational risks at this sensitive receptor (8.5 in one million) would be below the SCAQMD threshold of 10 in one million. Furthermore, long-term operational risks from on-site truck travel, maneuvering, and idling, as well as off-site travel on Utica Avenue and 6th Street, would contribute incremental cancer risks less than 1.4 in one million. Therefore, the proposed truck entrances and exits would not generate significant impacts at sensitive receptor locations and do not need to be relocated. Circulation and parking: Truck access would occur throughout the center and eastern perimeter of the site, and all truck parking would occur near the center of the site; trucks would be required to comply with Chapter 10.52, Stopping, Standing or Parking Restrictions, of the City of Rancho Cucamonga's Municipal Code and no overnight, off-site parking would occur near sensitive land uses. Although some idling and travel would occur on the eastern part of the site, most activities would be 370 feet or more from the closest adjacent land use and over 500 feet from the closest sensitive receptor. As described above, the revised HRA prepared for the Project (see FEIR Chapter 3, Errata) indicates the proposed Project would not result in significant adverse health risks at this receptor location.
F-16	The SCAQMD suggests the City review more than 500 pages of material that are generally referenced and to incorporate mitigation measures "as applicable". This comment does not identify any specific measure or measures that the SCAQMD recommends for incorporation into the EIR, nor does it suggest why measures included in the more than 500 pages are specifically relevant or related to the Project and/or the DEIR's air quality and GHG impact analyses. Nonetheless, the City has reviewed the documents referenced by the SCAQMD and determined that the

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	majority of measures identified in the referenced materials are already reflected in/included in the proposed Project: - Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act. Many of the best practices identified in this document are commensurate with the requirements of existing regulations and/or the mitigation measures already in the DEIR. For example, Section V. Air Quality and Greenhouse Gas Emissions Analysis and Mitigation, contains a measure to use paints that have volatile organic compound levels of less than 10 grams per liter, which is already required by Mitigation Measure AIR-2A. Section V also contains measures to reduce dust from construction (limiting daily grading and prohibiting grading depending on the AQI forecast), which are commensurate with the requirements of Plan RC COAs 5.3.3 and 5.3.4 (DEIR pp. 4.3.25 and 4.3.26) and SCAQMD Rule 403 (DEIR p. 4.3-21). Section V's measures to reduce travel demand would also be commensurate with the requirements of Mitigation Measure AIR-2D. Most other measures identified in the best practices document are either not applicable to the Project or not considered feasible for the Project; however, as explained in response to comment B-8, the City considers the sharing of information about incentive programs to be feasible, and the City has augmented Mitigation Measure AIR-2E to include a requirement to provide information about the HVIP to third-party trucking vendors. - SCAQMD 2022 AQMP: The three appendices referenced contain approximately 230 measures, which almost entirely would be implemented by the SCAQMD, CARB, and SCAG. The few measures that could be implemented by employers include travel demand measures in Appendix IV-C that would correspond to similar measures the Project would implement to comply with SCAQMD Rule 2202 (On-Road Motor Vehicle Mitigation Options) and Mitigation Measure AIR-2D. - U.S EPA Mobile Source Pollution – Environmental Justice and Transportation: The commenter has referenced an EPA webpage that describes the EPA's plans and regulations for environmental justice and transportation that would be implemented at the federal level. It does not include Project level control measures that could be incorporated into the proposed Project. The comment for review of additional resources is noted. It does not identify any specific measures that the SCAQMD suggests should be implemented into the DEIR or suggest that the DEIR's analysis is deficient.
F-17	The SCAQMD submits several different comments related to the control of NO_x emissions from construction equipment: The SCAQMD asserts the Project is a "long-range plan" and that Tier 4 technology may not be the cleanest technology "when construction occurs later for individual Projects." As a point of clarification, the DEIR does not evaluate a long-range plan, it evaluates a specific proposed Project that has two potential construction phases that would occur in the near-term. It would not involve construction activities 10, 15, or 20 years into the future.

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	The SCAQMD refers to the implementation of Tier 5 off-road equipment emissions standards starting in 2027 or 2028, CARB requirements to fully transition to zero emissions by 2035 and, “where feasible”, opting for electric emissions free engine, limiting the use of older engines, and incorporating cutting-edge exhaust after-treatment techniques. With regards to Tier 5 emissions standards, the City notes these standards do not yet exist and, according to CARB, “Staff plans to bring a proposal to the Board in 2025, with implementation of the Tier 5 standards expected to begin in 2029 . . . Under the Clean Air Act, the [U.S. EPA] preempts California from regulating agricultural and construction equipment less than 175 horsepower. Therefore, California must depend on U.S. EPA to strengthen emission standards for such preempted off-road equipment.” Given that CARB has not proposed specific Tier 5 emissions standards, and that such standards, even if proposed, would not take effect until 2029 at the earliest (assuming the U.S. EPA issues the necessary Clean Air Act waiver), this recommendation does not constitute a specific emissions control strategy. The City cannot commit to standards that do not yet exist. Likewise, non-specific references to CARB plans to fully transition to zero emissions, and the use of control measures where feasible, do not constitute evidence that the DEIR’s analysis of construction NO_x emissions is deficient, nor specific, feasible measures for the City to consider. The SCAQMD asserts the DEIR lacks a clear discussion on whether all feasible mitigation measures relevant to recent warehouse best practices have been adopted. The City notes that the SCAQMD does not identify or recommend a specific measure for consideration, and does not provide a specific reference regarding “recent warehouse best practices”. Nonetheless, as described in response to comment F-16, at the suggestion of the SCAQMD, the City did review Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act and determined many of the best practices identified in this document are commensurate with the requirements of existing regulations and/or the mitigation measures already into the DEIR.
F-18	The SCAQMD correctly summarizes the DEIR’s mobile source operational emissions findings and recommends the City consider modifying Mitigation Measure AIR-2E to require tenants that do not already operate 2014 and newer model year trucks are encouraged by the development to apply for funding to replace older diesel trucks with newer, less emitting trucks. The City notes that, as described in more detail in response to comment B-8, the City considers the sharing of information about incentive programs to be feasible, and the City has augmented Mitigation Measure AIR-2E to include a requirement to provide information about the HVIP to third-party trucking vendors.
F-19	The SCAQMD correctly identifies the DEIR’s assumptions used to evaluate potential backup generator emissions, including the assumption that this equipment would run for 50 hours a year, and notes that SCAQMD permit conditions typically allow up to 200 total operational hours a year for such equipment. Accordingly, as recommended by the SCAQMD, the City has revised the EIR’s evaluation of backup generator emissions to be based on up to 200 operating hours per year per generator. This revision was made the EIR criteria air pollutant emission estimates and the

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	operational HRA conducted for the Project. As shown in Chapter 3 of this FEIR, this revision did not result in a new or substantially more severe impact than identified in the DEIR.
F-20	The SCAQMD asserts the DEIR does not provide details or emissions estimates for cogeneration facility operations, backup generator emissions, groundwater well and water transmission line and chlorination treatment facilities, and electric transmission lines. The SCAQMD's assertion is incorrect: • The cogeneration facility equipment, operations, emissions, benefits, and impacts are fully described on DEIR pp. 3-39 and 3-40, 4.3-36, 4.3-37, 4.3-46, 4.3-55, and 4.3-56, 4.8-23, 4.8-24, and 4.8-29 to 4.8-32, as well as in DEIR Appendix C2. • The backup generator equipment, operations, emissions, and impacts are fully described on DEIR pp. 4.3-38, 4.3-39, 4.3-44, 4.3-55, 4.8-25, 4.8-28, and 4.8-29, and DEIR Appendix C2. • The ground water well equipment and operations are described on DEIR pp. 3-44, 4.3-32, and 4.8-25, 4.10-23, 4.19-11, and 4.19-19, as well as Appendix L. • The DEIR describes the water transmission line facilities needed to serve the Project on pp. 3-34 to 3-37, 4.3-31, and 4.19-7, as well as Appendix L. • The DEIR explains no new off-site electrical storage, transmission, or distribution infrastructure would be required to serve the Project's peak or annual electric demands on p. 4.6-32. The City notes that emissions associated with the groundwater well and water treatment are not anticipated, as pumps are electric and any chlorine treatment would be aqueous-based and occur at the existing treatment facilities, which have the capacity to treat the new ground water well. Since treatments would occur at existing facilities, on-site storage or chemical deliveries would not occur. For these reasons, it is not necessary to clarify or update the EIR discussion of these features.
F-21	The SCAQMD recommends the EIR include a discussion of applicable SCAQMD rules that may be applicable to the Project and provides a list of potentially relevant rules for the City to consider adding to the EIR. As a point of clarification, the DEIR (pp. 4.3-21 and 4.3-22) does include a discussion of SCAQMD rules that may be applicable to the proposed Project, and the majority of the rules referenced by the SCAQMD in their comment were discussed in the DEIR, including rules 203, 401, 402, 403, 110.3, 1113, Regulation 13, and Rule 1401, amongst others. The City notes it has reviewed the SCAQMD's list of rules, and rules that were not originally included have been added to the EIR (see FEIR Chapter 3). This revision does not substantially change the content or findings of the EIR.
F-22	The SCAQMD summarized the roles and responsibilities of Lead and Responsible Agencies under CEQA. The SCAQMD refers to CEQA procedures for a Responsible Agency, including making a decision on the adequacy of the Project EIR for use in the issuance of potential future discretionary SCAQMD air permits, and expresses concern that the DEIR's project description and analyses may be inadequate to be relied on for the purpose of issuing permits that the Project may need.

ID	Response to Comment Letter F – South Coast Air Quality Management District
	The SCAQMD's comment is noted. The DEIR (p. 3-48 and 4.3-21 to 4.3-24) clearly discloses that the Project may require a permit from the SCAQMD and that the SCAQMD may use the City's EIR to approve the subsequent issuance of such a permit. The City and applicant have made a good faith effort to describe and disclose all of the Project's potential emission generating activities, including construction activities, operational mobile source activities, and operational stationary source activities such as boiler, cogeneration, backup generator, and other stationary equipment. The DEIR makes reasonable but conservative assumptions (i.e., likely to overestimate) regarding all of the Project's emissions generating activities. For example, as explained on DEIR p. 4.3-54, Phase 1 and Phase 2 stationary source equipment emissions are based on maximum daily operations (i.e., 24-hours per day) at full operating loads. These conservative assumptions were purposefully applied to ensure the DEIR does not underestimate the Project's potential emissions levels; however, as a point of clarification, the EIR's evaluation of potential air quality and GHG impacts is based on preliminary design information for the Project's potential stationary source equipment, and the EIR's Project Description and air quality analysis do not constitute an air permit application that requires SCAQMD action at this time. The Project's final equipment make, model, and operational characteristics would be provided to the SCAQMD for review by the applicant at the time the applicant applies for a permit from the SCAQMD.
F-23	The SCAQMD provides conclusionary remarks. The City appreciates the SCAQMD's review of the DEIR. As described in response to comments F-2 to F-21, the City has prepared a fact-based evaluation of the proposed Project that fully identifies and discloses the Project's potential emissions sources and air quality and GHG impacts. Where the City, as Lead Agency, has taken a different position than the SCAQMD, detailed reasons supported by substantial evidence explain why specific comments and suggestions were not accepted; however, the EIR provides a good faith effort on the part of the City to evaluate the Project air quality and GHG impacts in accordance with SCAQMD guidance, rules, methods, and procedures to ensure that the SCAQMD may rely upon the DEIR as the basis for permit conditions and emissions limits for any air permits the Project may require.

References added by inclusion in Responses to Comments in Letter F

SCAQMD, 2008. Final Localized Significance Threshold Methodology Document. Diamond Bar, CA. July 2008. < https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf?sfvrsn=8c641d61_2

CARB, 2025. <https://ww2.arb.ca.gov/our-work/programs/tier5/about> Accessed August 20, 2025.

COMMENT LETTER G – LOZEAU DRURY LLP FOR SUPPORTERS ALLIANCE FOR ENVIRONMENTAL RESPONSIBILITY (SAFER)



LETTER G

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**Re: Comment on Draft Environmental Impact Report, El Camino Project
(SCH 2023080369)**

Dear Planner McPherson and Planner Vargas:

This comment is submitted on behalf of Supporters Alliance for Environmental Responsibility ("SAFER") regarding the Draft Environmental Impact Report ("DEIR") prepared for the El Camino Project (SCH 2023080369), which proposes the demolition of up to 62,210 square feet of an existing warehouse to construct up to 1,054,541 square feet of new buildings for manufacturing, light industrial and office uses, located at 4952 and 4972 Warner Avenue (APNs 209-411-02, -03, -04, 23, -24, -32, and -35) in the City of Rancho Cucamonga ("Project").

SAFER is concerned that the DEIR fails as an informational document and fails to impose all feasible mitigation measures to reduce the Project's impacts. SAFER requests that the Community Development Department address these shortcomings in a revised draft environmental impact report and recirculate it prior to considering approvals for the Project.

SAFER reserves the right to supplement these comments during the administrative process. *Galante Vineyards v. Monterey Peninsula Water Management Dist.*, 60 Cal. App. 4th 1109, 1121 (1997).

Sincerely,

A handwritten signature in blue ink, appearing to read "Rebecca Davis", is written over a horizontal line.

Rebecca Davis
Lozeau Drury LLP

G1

ID	Response to Comment Letter G – Lozeau Drury LLP for SAFER
G-1	Safer's general concern that the DEIR fails as an informational document and fails to impose all feasible mitigation measures to reduce the Project's impacts are noted. However, no specific comments or substantiation was provided related to the mitigation measures or other parts of the Draft EIR to support these concerns. Nonetheless, the City has examined this claim and concludes the DEIR is in fact sufficient as an informational document and does impose all feasible mitigation measures to reduce the Project's impacts as outlined in the various analysis sections of the DEIR and further substantiated throughout the FEIR document. The City has considered all comments made on the DEIR and determined it is not necessary to recirculate the EIR according to State CEQA Guidelines Section 15088.5. The City understands that SAFER reserves the right to supplement these comments during the administrative process.

COMMENT LETTER H – BLUM, COLLINS & HO LLP FOR GOLDEN STATE ENVIRONMENTAL JUSTICE ALLIANCE (GSEJA) + SUPPORTING LETTER FROM SWAPE

LETTER H

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 Rancho Cucamonga, CA 91730

Via Email to:
sean.mcpherson@cityofrc.us

Subject: Comments on El Camino Project EIR (SCH NO. 2023080369)

Dear Mr. McPherson,

Thank you for the opportunity to comment on the Environmental Impact Report (EIR) for the proposed El Camino Project. Please accept and consider these comments on behalf of Golden State Environmental Justice Alliance. Also, Golden State Environmental Justice Alliance formally requests to be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. Send all communications to Golden State Environmental Justice Alliance P.O. Box 79222 Corona, CA 92877.

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1.0 Summary

The Project involves the development and redevelopment of the 30.1-acre site to expand the operations of an existing beverage facility to allow for the production, bottling and expanded distribution of beverage products (at present there is no beverage production or bottling at the facility, only warehousing and distribution activities). Multiple buildings currently occupy the southern and northern portions of the site (approx. 17.9 acres) while the central portion (a former vineyard) occupies 12.2 acres of the site. At the time the NOP was issued, the southern portion of the site contained an operating beverage distribution facility and two occupied office buildings. The northern portion of the site contains an existing 62,210-square foot warehouse on approximately 3 acres. The Project applicant is proposing to demolish up to 237,895 square feet of existing building area and construct up to 1,054,541 square feet of new manufacturing, light industrial, and office uses on the Project site that will function as the overall expanded beverage bottling and distribution facility.

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The project proposes redevelopment of eight parcels that comprise the project site for the construction of a new Production Center (PC), Distribution Center (DC), an Automated Storage and Retrieval System (ASRS), and a 4-story parking structure. Once the existing onsite buildings are demolished, the new PC building will occupy the center of the southern and northern portions of the site, the new DC building will occupy the western half of the central portion of the site, and the ASRS building will occupy the eastern half of the central portion of the site. Loading docks for the new PC building will be along its eastern boundary just west of Utica Avenue. A new proposed 335,475-square foot 4-story parking structure and truck deck will be located southwest of the new PC building and just west of the existing office building along the east side of Haven Avenue. Selective demolition will result in the removal of some existing structures, while some buildings will be retained or repurposed. At full operational capacity, the Project would operate up to 24 hours per day and 7 days a week. The Project site has a General Plan land use designation of 21st Century Employment District and is within the Mixed Employment 2 (ME2) Zone.

The Project proposes a discretionary Master Plan application as an entitlement tool to adopt specific development standards for the Project that vary from the required City development standards, but incorporate various community benefits in exchange for the requested deviations.

The Project requires the following discretionary actions/approvals:

1. Master Plan (DRC2023-00072) - The Project site is presently zoned ME2 Mixed Employment designation. The Project Master Plan identifies specific exceptions to the zone development standards. It also includes building details, elevations, landscaping and fencing plans, and other design elements.
2. Design Review (DRC2023-00067) – The Design Review of the site plan and architectural design for the development of the bottling and distribution facility. The Project is being developed in two Phases which are evaluated in the EIR for potential impacts (Phase 1 and Phase 2). A new Design Review or Minor Design Review application will be required by the City for approval once plans for Phase 2 are completed. The City will review Phase 2 plans for consistency with the environmental analysis of the potential environmental impacts for Phase 2 included in this EIR. This applies to both Phase 2A (reuse of the existing building) as well as Phase 2B (demolition of the existing building and construction of a new building).
3. Conditional Use Permit (DRC-2023-00068) – The Project will operate a “Manufacturing, Light-Large” land use as defined in the City’s zoning ordinance and continue operations of “Wholesale and Distribution, Medium” land use in the Mixed Employment 2 (ME2) District. A Conditional Use Permit (CUP) for Wholesale and Distribution has been included for the Project since this use is no longer permitted in the ME2 zone per the City’s updated development standards. Impacts associated with the Project and the CUP (including 1,000 square feet of cold storage space) will be analyzed in the EIR and evaluated in the technical studies.

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4. Tentative Parcel Map (SUB TPM20713) – The proposed Tentative Parcel Map (TPM) would include a request to consolidate the eight existing parcels and create three new parcels for the Project. The TPM would create the following three lots: Parcel 1 would be approximately 25.39 acres in size for the new industrial buildings, parking structure and office building; Parcel 2 would be 0.68 acres and would provide a new access from 7th Street to the Project site; and Parcel 3 would be 3.88 acres and would encompass the existing 7th Street warehouse building and parking area. Additionally, three lettered lots would be created for access.
5. Uniform Sign Program (DRC 2023-00069) - The proposed Project includes the review of a Uniform Sign Program which governs the design and construction of all planned and future signs.
6. Tree Removal Permit (DRC2023-00070) –The Project proposes the removal of a number of trees that require the submittal of a removal permit as the identified trees meet the intent of Section 17.80 of the City's Development Code.
7. Development Agreement (DRC2024-00163): A statutory development agreement, pursuant to California Government Code Section 65864 et seq. and Rancho Cucamonga Development Code Section 17.22.060, may be processed concurrent with the approval of this Project that would provide the project applicant with assurance that development of the project may proceed subject to the rules and regulations in effect at the time of project approval. The Development Agreement would also provide the City of Rancho Cucamonga with assurance that certain obligations of the project applicant would be met, such as the required timing of public improvements, the Applicant's contribution toward funding community improvements, and other conditions. No physical changes in the environment (beyond those described herein) are assumed in connection with the Development Agreement.

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4.6 Energy

The State of California lists three approved compliance modeling softwares¹ for non-residential buildings: CBECC-Com, EnergyPro, and IES VE. CalEEMod is not listed as an approved software. The CalEEMod and EMFAC modeling does not comply with the 2022 Building Energy Efficiency Standards and under-reports the project's significant Energy impacts and fuel consumption to the public and decision makers. Since the EIR did not accurately or adequately model the energy impacts in compliance with Title 24, it cannot conclude the project will generate less than significant impacts and a finding of significance must be made. A revised EIR with modeling using one of the approved software types must be prepared and circulated for public review in order to adequately analyze the project's significant environmental impacts. This is vital as the EIR utilizes unapproved software programs as sources in its methodology and analysis, which does not adequately analyze the project's impacts in accordance with California Energy requirements.

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¹ California Energy Commission 2022 Energy Code Compliance Software
<https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2022-building-energy-efficiency-1>

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4.9 Hazards and Hazardous Materials

The EIR identifies that the project site, “is located within the Airport Influence Area (AIA) of the Ontario International Airport.” The EIR excludes that Map 2-4: Compatibility Policy Map: Airspace Protection Zones² within the Ontario International Airport Land Use Compatibility Plan³ identifies that the majority of the project site is within the maximum 70 ft. building height in the High Terrain Zone and a portion of the site is within the maximum 70 ft. - 100 ft. building height area. The EIR states here that, “The Project also proposes several tall buildings on the site (i.e., ASRS is max. 130 feet and 70 feet average, PC building is max. 41 feet, and DC is max. 45 feet). These buildings are approximately 10,000 feet north-northeast of the closest ONT runway. Therefore, the Project will need to obtain clearance from the Federal Aviation Administration (FAA) and comply with its lighting/signage restrictions and warning improvements. These potential restrictions are addressed in Mitigation Measure HAZ-3 below.”

Mitigation Measure HAZ-3 requires the following:

“Mitigation Measure HAZ-3: FAA Lighting Hazards. A minimum of 45 days prior to submittal of an application for a building permit for the project, the applicant shall consult with the City of Rancho Cucamonga Planning Department in order to determine whether any implementing project-related vertical structures will encroach into the 100-to-1 imaginary surface surrounding the ONT. If it is determined that there will be an encroachment into the 100-to-1 imaginary surface, the applicant shall file a FAA Form 7460-1, Notice of Proposed Construction or Alteration. If FAA determines that the implementing development project would potentially be an obstruction unless reduced to a specified height, the applicant and the City Planning Division will work with FAA to resolve any adverse effects on aeronautical operations including any lighting or other restrictions or prohibitions which may include but are not limited to the following...”

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The EIR is internally inconsistent as it simultaneously states that FAA review is required in order to determine if there is a hazard to flight, yet then as mitigation delegates the discretion of need for FAA review to City Planning Staff. The highest point of the ASRS building is 131 feet, yet any building on the project site cannot exceed a height of 100 feet above ground level as required by the Ontario International ALUCP.

The EIR also states that, “San Bernardino County has delegated each airport proprietor to create individual Airport Land Use Compatibility Plans, rather than establish an Airport Land Use Commission. The Ontario International Airport Land Use Compatibility Plan (ONT ALUCP)

² Map 2-4: Airspace Protection Zones, Ontario Airport ALUCP <https://www.ont-iac.com/wp-content/uploads/2019/02/ONT-ALA-policy-map-2-4.pdf>

³ <https://www.ont-iac.com/airport-land-use-compatibility-plan/>

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serves to promote safe compatibility between the airport and the surrounding land uses.” San Bernardino County utilizes a “Designated Agency” to administer each of the ALUCPs as prescribed in Public Utilities Code (PUC) Section 21670.1. PUC Section 21670.1(a) states that, “Notwithstanding any other provision of this article, if the board of supervisors and the city selection committee of mayors in the county each makes a determination by a majority vote that proper land use planning can be accomplished through the actions of an appropriately designated body, then the body so designated shall assume the planning responsibilities of an airport land use commission as provided for in this article, and a commission need not be formed in that county.” Establishment of the designated agency in a county only eliminates the requirement for formation of an airport land use commission, not the obligation to plan for and achieve compatible land uses surrounding airports. Ontario International Airport is operated via a joint powers agreement between the City of Ontario and the County of San Bernardino. Therefore, the project must also be reviewed for compatibility with the Ontario International ALUCP by the applicable staff at the City of Ontario and/or the County of San Bernardino. This is also affirmed in Table 2-1: Major Land Use Actions subject to the ONT Inter-Agency Notification Process⁴ within the Ontario International ALUCP, which states that, “The following types of Major Land Use Actions are subject to the ONT Inter-Agency Notification Process only if they are located within an airspace protection zone (Applies to all Affected Jurisdictions): Any proposed object (including buildings, antennas, and other structures) that would penetrate the allowable height as defined by Map 2-4 or conflict with the Airspace Protection policies.”

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Delaying review of the project in accordance with the ALUCP by the applicable staff at the City of Ontario and/or the County of San Bernardino and by the FAA is deferred mitigation in violation of the CEQA environmental impact disclosure process and is not adequate justification to demonstrate that the project will not result in a safety hazard or excessive noise for people residing or working in the project area due to the site’s proximity to the Ontario International Airport. A finding of significance must be provided in a revised EIR as the EIR has not provided any meaningful evidence to support a less than significant finding.

Notably, the City’s General Plan Draft EIR that the project tiers from states that, “The southwestern portion of the city (south of Church Street east to approximately Etiwanda Avenue) is in the Ontario International Airport Influence Area; thus, compliance with applicable regulations of the Federal Aviation Administration (FAA) would be required, and the Airport Land Use Compatibility Plan would be considered for any proposed project in the area. Considerations for new development would be airport-related safety, noise, airspace protection, and overflight factors. The City of Rancho Cucamonga participates in the airport land use planning process for Ontario

⁴ <https://www.ont-iac.com/wp-content/uploads/2019/02/ALUCP-Chap-2-Table-2-1-Major-LU-Actions-Amendment-July-2018-Final-Doc.pdf>

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International Airport, and new development in the Ontario Airport Influence Area would be consistent with the approved Airspace Protection Zones identified in the latest version of the Airport Land Use Compatibility Plan. Therefore, impacts would be less than significant.” The EIR has not adequately addressed the requirements of the Ontario International ALUCP nor the General Plan EIR. The project is not consistent with the Airspace Protection Zone Map of the Ontario International ALUCP as required by the General Plan EIR. A finding of significance must be provided in a revised EIR as the EIR has not provided any meaningful evidence to support a less than significant finding.

Additionally, it must be noted that it is unclear if the City’s General Plan adopted in 2021 was reviewed by the applicable staff at the City of Ontario and/or the County of San Bernardino for compliance with the Ontario International ALUCP. Prior to the amendment of a general plan or specific plan, or the adoption of a zoning ordinance or building regulation within the ALUCP planning boundary, the ALUC shall review the plan, ordinance, or regulation for consistency with the ALUCP (PUC Section 21676(b)). If a local agency has neither revised its general plan or applicable specific plans, nor overruled the ALUC by a two-thirds vote of its governing body (with required findings), the ALUC may require that all local agency actions, regulations, and permits be submitted for review to determine consistency with the ALUCP (PUC Section 21676.5(a)). The EIR must be revised to clarify if the City’s 2021 General Plan has been reviewed by the Designated Agency and deemed consistent with the Ontario International ALUCP in order to provide an adequate and accurate environmental analysis.

H4

4.11 Land Use and Planning

The EIR has not completed a consistency analysis of the proposed project and all General Plan goals and policies. A revised EIR must be prepared with a consistency analysis with all General Plan policies goals and policies, including the following items that the project has significant potential for direct inconsistency due to errors in modeling, modeling without supporting evidence:

1. Goal LC-1 A City of Places. A beautiful city with a diversity and balance of unique and well-connected places.
2. Policy LC-1.2 Quality of Place. Ensure that new infill development is compatible with the existing, historic, and envisioned future character and scale of each neighborhood.
3. Policy LC-1.3 Quality of Public Space. Require that new development incorporate the adjacent street and open space network into their design to soften the transition between private and public realm and creating a greener more human-scale experience.
4. Policy LC-1.5 Master Planning. When planning a site, there must be meaningful efforts to master plan the site so as to ensure a well-structured network and block pattern with sufficient access and connectivity to achieve the placemaking goals of this General Plan.
5. Policy LC-1.6 Disadvantaged Communities. Prioritize development appropriate to the needs of disadvantaged communities, particularly south of Foothill Boulevard.

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6. Policy LC-1.7 Design for Safety. Require the use of Crime Prevention Through Environmental Design (CPTED) techniques such as providing clear lines of sight, appropriate lighting, and wayfinding signs to ensure that new development is visible from public areas and easy to navigate.
7. Policy LC-1.8 Public Art. Require new construction to integrate public art in accordance with the City Public Arts Program.
8. Policy LC-1.10 Development Incentives. Consider incentives for new development that provides substantial economic and placemaking benefit to the community and prohibit the provision of incentives that outweigh the direct benefits of the development and its use.
9. Policy LC-1.13 Improved Public Realm. Require that new development extend the “walkable public realm” into previously vacant and/or parking lot dominant large single-use parcels of land.
10. Policy LC-1.16 Healthy Development. Ensure that the design and development of our communities supports the health and well-being of our residents. Use the Healthy Development Checklist, or similar assessment tool, to assess the overall health performance and supportiveness of new development projects.
11. Goal LC-2 Human Scaled. A city planned and designed for people fostering social and economic interaction, an active and vital public realm, and high levels of public safety and comfort.
12. Policy LC-2.1 Building Orientation. Require that buildings be sited near the street and organized with the more active functions—entries, lobbies, bike parking, offices, employee break rooms and outdoor lunch areas—facing toward and prominently visible from the street and visitor parking areas.
13. Policy LC-2.2 Active Frontages. Require new development abutting streets and other public spaces to face the public realm with attractive building facades, and entries to encourage walking, biking, and public transit as primary—not “alternative”—mobility modes.
14. Policy LC-2.5 Gradual Transitions. Where adjacent to existing and planned residential housing, require that new development of a larger form or intensity, transition gradually to a complement the adjacent residential uses.
15. Goal LC-3 Fiscally Sustainable. A fiscally sound and sustainable City.
16. Policy LC-3.1 Community Value. Actively manage growth and investments in the community to maximize the value of new development, seeking value-per-acre outcomes of up to six times higher.
17. Policy LC-3.2 Community Benefit. Require a community benefit and economic analysis for large projects that abut existing neighborhoods or for any project at the maximum density, with a focus on resolving physical, economic, long-term fiscal, and aesthetic impacts.
18. Policy LC-3.3 Community Amenities. Balance the impacts of new development, density, and urbanization through the provision of a high-level of neighborhood and community amenities and design features.
19. Policy LC-3.5 Efficient Growth. Manage growth in a manner that is fiscally sustainable, paced with the availability of infrastructure, and protects and/or enhances community value. Discourage growth and development that will impact the City’s ability to sustainably maintain infrastructure and services.
20. Policy LC-7.3 Campus Design. Encourage employment areas to be developed like a college campus with buildings oriented toward an internal roadway, buffer landscaping along the

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- perimeter, and ample opportunities for paths and trails connecting to the City system, as well as relaxation areas for employees.
21. Policy MA-1.4 Local Mobility Hub. Require new development at mobility hubs and key stops along the future bus rapid transit and future transit circulator system to facilitate first mile/last mile connectivity to neighborhoods.
 22. Policy MA-2.10 Block Pattern. Require development projects to arrange streets in an interconnected block pattern, so that pedestrians, bicyclists, and drivers are not forced onto arterial streets for inter- or intra- neighborhood travel.
 23. Policy MA-3.3 Vulnerable User Safety. Prioritize pedestrian improvements in the Pedestrian Priority Area shown on Figure 8 to promote safety in the southwest area of the city.
 24. Goal H-1 Housing Opportunities. A diverse community with a broad range of housing types and opportunities to accommodate expected new households.
 25. Policy H-1.1 RHNA Requirement. Encourage the development of a wide range of housing options, types, and prices that will enable the City to achieve its share of the RHNA.
 26. Goal RC-5 Local Air Quality. Healthy air quality for all residents.
 27. Policy RC-5.1 Pollutant Sources. Minimize increases of new air pollutant emissions in the city and encourage the use of advance control technologies and clean manufacturing techniques.
 28. Policy RC-5.2 Air Quality Land Use Compatibility. Avoid siting of homes, schools, hospitals, and childcare facilities and land uses within 500 feet of land uses that are considered large emitters.
 29. Policy RC-5.3 Barriers and Buffers. Require design features such as site and building orientation, trees or other landscaped barriers, artificial barriers, ventilation and filtration, construction, and operational practices to reduce air quality impacts during construction and operation of large stationary and mobile sources.
 30. Policy RC-5.5 Impacts to Air Quality. Ensure new development does not disproportionately burden residents, due to age, culture, ethnicity, gender, race, socioeconomic status, or geographic location, with health effects from air pollution. Prioritize resource allocation, investments, and decision making that improves air quality for residents disproportionately burdened by air pollution because of historical land use planning decisions and overarching institutional and structural inequities.
 31. Policy RC-5.6 Community Benefit Plan. Require that any land use generating or accommodating more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units (TRUs) per day, or where TRU unit operations exceed 300 hours per week, provide a community benefit plan demonstrating an offset to community impacts of the truck traffic.
 32. Policy RC-5.9 Truck Hook-Ups at New Industrial or Commercial Developments. Require new industrial or commercial developments at which heavy-duty diesel trucks idle on-site to install electric truck hook-ups in docks, bays, and parking areas.
 33. Goal RC-6 Climate Change. A resilient community that reduces its contributions to a changing climate and is prepared for the health and safety risks of climate change.
 34. Policy RC-6.1 Climate Action Plan. Maintain and implement a Climate Action Plan (CAP) that provides best management practices for reducing greenhouse gas emissions.
 35. Policy RC-6.5 GHG Reduction Goal. Reduce emissions to 80 percent below 1990 levels by 2050 and achieve carbon neutrality by 2045.

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36. Policy RC-6.12 Reduced Water Supplies. When reviewing development proposals, consider the possibility of constrained future water supplies and require enhanced water conservation measures.
37. Policy RC-6.13 Designing for Warming Temperatures. When reviewing development proposals, encourage applicants and designers to consider warming temperatures in the design of cooling systems.
38. Policy RC-6.14 Designing for Changing Precipitation Patterns. When reviewing development proposals, encourage applicants to consider stormwater control strategies and systems for sensitivity to changes in precipitation regimes and consider adjusting those strategies to accommodate future precipitation regimes.
39. Policy RC-6.15 Heat Island Reductions. Require heat island reduction strategies in new developments such as light-colored paving, permeable paving, right-sized parking requirements, vegetative cover and planting, substantial tree canopy coverage, and south and west side tree planting.
40. Policy RC-6.16 Public Realm Shading. Strive to improve shading in public spaces, such as bus stops, sidewalks and public parks and plazas, through the use of trees, shelters, awnings, gazebos, fabric shading and other creative cooling strategies.
41. Policy RC-7.9 Passive Solar Design. Require new buildings to incorporate energy efficient building and site design strategies for the arid environment that include appropriate solar orientation, thermal mass, use of natural daylight and ventilation, and shading.
42. Policy RC-7.12 Solar Access. Prohibit new development and renovations that impair adjacent buildings' solar access, unless it can be demonstrated that the shading benefits substantially offset the impacts of solar energy generation potential.
43. Goal S-5 Emerging Hazards. A built environment that incorporates new data and understanding about changing hazard conditions and climate stressors.
44. Policy S-5.4 Extreme Heat Vulnerabilities. Require that new developments, major remodels, and redevelopments address urban heat island issues and reduce urban heat island effects for the proposed project site and adjacent properties.
45. Policy S-5.5 Resilience Resources. Require new developments and redevelopments to incorporate resilience amenities such as, but not limited to community cooling centers, emergency supplies, and backup power that can be used by residents and businesses within a 1/4-mile radius of the location.
46. Policy S-5.6 Underground Utilities. Promote the under-grounding of utilities for new development, major remodels, and redevelopment.
47. Policy S-5.8 Climate Resiliency. Address climate resiliency and inequities through the planning and development process.
48. Policy S-5.9 Address High Winds. Require buildings and developments exposed to high wind conditions to incorporate design elements and features that minimize or reduce damage to people, structures, and the community.
49. Policy S-6.5 Height Restrictions. Require proposed developments within the Ontario Airport Influence Area meet the height requirements associated with FAR Part 77 standards.
50. Policy S-6.6 Development Near Airport. New development within the Ontario Airport Influence Area shall be consistent with the approved Airspace Protection Zones identified in the latest version of the Airport Land Use Compatibility Plan.

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Additionally, the EIR has not acknowledged or analyzed all of the General Plan designations for the project site and its immediate vicinity in the City's planning vision. Figure V-2: Vision Diagram within the General Plan depicts the intersection of 6th Street and Haven Avenue as a City Center. Figure LC-1: Vision Diagram (Community Activity Nodes) within the General Plan depicts the intersection of 6th Street and Haven Avenue as a Corridor Activity Node. Figure M-6: Pedestrian Focus Areas within the General Plan depicts the site as within a Pedestrian Focus Area. The EIR has not demonstrated that the project complies with any of the requirements of these designations. The EIR must be revised to include a finding of significance as there is no meaningful evidence to support a less than significant finding.

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Table 4.11-3 Master Plan Consistency Analysis indicates that the project has submitted a request for discretionary approval of a Master Plan to deviate from specific development standard requirements in the areas of Building Typology, Building Facades, Building Articulation, Build to Line and Frontage Area, Block Size/Building Configurations – High Rise, Block Size/Building Configuration - Mid Rise, Site and Block Configurations, Slip Lane/Street Frontage, Parking Standards – Manufacturing, Light- Large, and Bicycle Parking.

H7

Rancho Cucamonga Development Code (RCDC) Section 17.22.020(C)(3) requires a Master Plan for industrial buildings 450,000 square feet or more and states that, "the master planning process is expected to ensure that the proposed industrial development provides community benefits that may not otherwise be provided through strict application of the provisions of this title." The EIR has not described any of the community benefits that are provided as a result of approving the requested deviations from the RCDC. Further, RCDC Section 17.22.020(D) requires that, "A master plan shall not be adopted unless the following findings are made:

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1. The proposed master plan is consistent with the goals, policies, and objectives of the general plan.
2. The proposed master plan meets the applicable requirements set forth in this title."

As listed above and throughout the EIR via its conclusion that the project will result in significant and unavoidable impacts to Air Quality and GHG, the project is not consistent with several goals, policies, and/or objectives of the General Plan, including the Housing Element. The EIR has also not demonstrated that the proposed Master Plan meets the applicable requirements set forth in RCDC Section 17.22.020 as it has not given any information regarding the community benefits that are provided as a result of approving the requested deviations from the RCDC that ultimately contribute to the project's significant and unavoidable impacts to Air Quality and GHG. The Master Plan cannot be approved pursuant to RCDC Section 17.22.020(D), and a finding of significance must be made in a revised EIR.

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4.14 Population, Housing, and Employment

The project faces two significant inconsistencies with statutory requirements. The first is inconsistency with State Housing Element Law. Pursuant to Government Code Section 65863⁵, a jurisdiction shall ensure that its housing element sites inventory “can accommodate, at all times throughout the planning period, its remaining unmet share of the regional housing need allocated pursuant to Section 65584” and “at no time...shall a city, county, or city and county by administrative, quasi-judicial, legislative, or other action permit or cause its inventory of sites identified in the housing element to be insufficient to meet its remaining unmet share of the regional housing need for lower and moderate-income households.” Further, this Section states the following:

“No city, county, or city and county shall, by administrative, quasi-judicial, legislative, or other action, reduce, or require or permit the reduction of, the residential density for any parcel to, or allow development of any parcel at, a lower residential density, as defined in paragraphs (1) and (2) of subdivision (g), unless the city, county, or city and county makes written findings supported by substantial evidence of both of the following:

(A) The reduction is consistent with the adopted general plan, including the housing element.

(B) The remaining sites identified in the housing element are adequate to meet the requirements of Section 65583.2 and to accommodate the jurisdiction’s share of the regional housing need pursuant to Section 65584. The finding shall include a quantification of the remaining unmet need for the jurisdiction’s share of the regional housing need at each income level and the remaining capacity of sites identified in the housing element to accommodate that need by income level.”

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Table B-1: Vacant Sites within Appendix B: Sites Inventory of the City’s HCD Certified Housing Element⁶ identifies all multiple parcels within the project site as part of its identified sites inventory to accommodate its RHNA allocation. The EIR has not provided any analysis to demonstrate that the remaining sites identified in the housing element are adequate to meet the requirements of Government Code Section 65583.2 and to accommodate the jurisdiction’s share of the regional housing need pursuant to Government Code Section 65584 through the end of the 2021-2029 planning period. The EIR has not demonstrated that the City’s Housing Element can accommodate at all times throughout the planning period its remaining unmet share of the regional housing need. The EIR must be revised to include a finding of significance because it has not demonstrated that

⁵ Government Code Section 65863

https://leginfo.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV§ionNum=65863

⁶ Rancho Cucamonga 6th Cycle (2021-2029) HCD Certified Housing Element

<https://hedpowerbi.blob.core.windows.net/housing-elements/rancho-cucamonga-draft071922.pdf>

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the City can continue to accommodate its RHNA following the potential approval of the proposed project. This is vital as the proposed project sites are listed in the City's Housing Element Identified Sites Inventory as follows:

APN 209-411-002

14 Low Income Units

APN 209-411-032

38 Low Income Units

APN 209-411-035

69 Low Income Units

Total: 121 Low Income Unit Capacity in Housing Element (RHNA)

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The project's second significant inconsistency with statutory requirements involves major conflicts with the HCA/SB 330. The Housing Crisis Act (HCA) of 2019/Senate Bill (SB) 330⁷ require replacement housing sites when land that permits the development of housing is changed to a non-housing use to ensure no net loss of residential development capacity. Government Code Section 66300(b)(1)(A) requires that agencies shall not "change the general plan land use designation, specific plan land use designation, or zoning to a less intensive use below what was allowed under the land use designation and zoning ordinances in effect on January 1, 2018." Under Government Code Section 66300(b)(1)(A), a "less intensive use" includes, but is not limited to, reductions to height, density, or floor area ratio, new or increased open space or lot size requirements, or new or increased setback requirements, minimum frontage requirements, or maximum lot coverage limitations, or anything that would lessen the intensity of housing. Pursuant to SB 330, replacement capacity for any displaced residential unit capacity must be provided at the time of project approval.

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Project implementation will result in exclusively industrial development. The site would not be used for the development of residential dwelling units and replacement sites must be proposed and analyzed as part of the project. The EIR does not act in conformance with these laws and has not identified replacement sites for housing. Specifically, the existing General Plan and Zoning designations permit the development of up to 1,263 residential dwelling units (as shown below), and a portion of that unit capacity is relied upon in the City's 2021-2029 Housing Element to accommodate low income RHNA units. The lost capacity of 1,263 dwelling units is a significant environmental impact in violation of the HCA/SB 330. The EIR must be revised to include a finding of significance due to this inconsistency.

⁷ Housing Crisis Act of 2019/SB 330

https://leginfo.ca.gov/faces/billTextClient.xhtml?bill_id=201920200SB330

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APN 209-411-023

2.077 acres

Maximum residential capacity: 87 dwelling units

APN 209-411-024

2.165 acres

Maximum residential capacity: 90 dwelling units

APN 209-411-034

9.100 acres

Maximum residential capacity: 382 dwelling units

APN 209-411-032

4.390 acres

Maximum residential capacity: 184 dwelling units

APN 209-411-035

7.830 acres

Maximum residential capacity: 328 dwelling units

APN 209-411-002

1.600 acres

Maximum residential capacity: 67 dwelling units

APN 209-411-003

1.535 acres

Maximum residential capacity: 64 dwelling units

APN 209-411-004

1.465 acres

Maximum residential capacity: 61 dwelling units

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Approval of the EIR and the proposed project will result in a net loss of housing capacity of 1,263 dwelling units. This is a significant environmental impact in violation of the HCA/SB 330 and State Housing Element Law (California Government Code Sections 65580 - 65589.11). The EIR must be revised to include a finding of significance due to this inconsistency. Additionally, deferring the identification of replacement sites to a later date is project piecemealing in violation of CEQA. The EIR does not accurately or adequately describe the project, meaning "the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment" (CEQA § 15378). The whole of the action must statutorily and legally include identified replacement sites to accommodate the lost capacity of 1,263 dwelling units (including 121 Low Income units). The City must also amend its Housing Element to remove the proposed project sites from the land inventory, include the replacement sites, and forward to HCD for review and certification. This is

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a significant and unavoidable environmental impact and a finding of significance must be made in a revised EIR.

H11

Further, the significant and unavoidable impacts of the project and the project's operational characteristics prohibit residential development within 1,000 feet of the project site. This is required in the General Plan as stated by, "Policy RC-5.7 New Sensitive Receptors Near Existing Industrial Uses. Avoid placing homes, schools, hospitals, and childcare facilities within 1,000 feet of a land use that accommodates more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units (TRUs) per day, or where TRU unit operations exceed 300 hours per week." The project will accommodate approximately 1,300 trucks per day and therefore Policy RC 5.7 applies to all properties within 1,000 feet of the project site. The EIR has not provided the residential capacity of all sites within 1,000 feet of the project site and replacement sites as required by The Housing Crisis Act (HCA) of 2019/Senate Bill (SB) 330. A finding of significance must be made in a revised EIR.

A parcel located within 1,000 feet of the project site is also in the Table B-1: Vacant Sites within Appendix B: Sites Inventory of the City's HCD Certified Housing Element:

H12

APN 20925105
1.66 acres
14 low income units
835 feet from project site

Policy RC 5.7 prevents APN 20925105 from developing with residential uses. This site must be removed from the Housing Element and replacement sites accommodating at least 14 Low Income units must be identified. The EIR has not provided any of this analysis for discussion and replacement sites as required by State Housing Element Law (California Government Code Sections 65580 - 65589.11) have not been identified. This is a significant and unavoidable impact and a finding of significance must be made in a revised EIR.

The EIR states that, "According to the applicant as outlined in Section 3, Project Description, the existing beverage distribution plant onsite operates three shifts with 20-61 employees, 75 drivers, and 17 administrative staff (total 185 workers). The proposed Project would operate similar to the existing facility but with a total of 474 employees at its maximum peak operational capacity (3 shifts per day, 6 days per week). Therefore, at full operation the Project would result in a total need for 289 additional workers but with no new housing or population onsite." The EIR does not provide any meaningful evidence to support the conclusion that the project currently employs 185 people onsite. There is no information provided regarding the methodology to calculate that the proposed project will generate a total of 474 employees. There is no method for the public to

H13

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verify this calculation and the EIR is inadequate as an informational document. A revised EIR must be prepared to provide the source methodology for the calculation that the project will generate 474 operational jobs.

The EIR states that, “This amount of employment growth (+289 net employees) represents only 1.7% of the employment growth (+16,800) anticipated by SCAG in the City from 2016 to 2045 (see Table 4.14-1). It also represents 1.3% of the 21,600 additional employees expected in the City by 2050 (see Table 4.14-2). Therefore, the Project falls within the growth projections of both the 2020 and 2024 RTP/SCS documents.” The EIR does not provide any cumulative analysis discussion of projects approved since 2016 and projects “in the pipeline” to determine if the project will exceed the employment/population growth forecasts by SCAG and/or the General Plan. For example, other recent industrial projects such as 9th and Vineyard⁸ (823 employees) combined with the proposed project will cumulatively generate 1,112 employees, which is 5.1% of the City’s employment growth forecast through 2050 accounted for only by two recent industrial projects. This total increases exponentially when other industrial and commercial development activity is added to the calculation. A revised EIR must be prepared to include this information for analysis, and also provide a cumulative analysis discussion of projects approved since 2016 (SCAG), General Plan adoption, and projects “in the pipeline” to determine the City’s cumulative progress towards employment/population growth forecasts by SCAG and/or the General Plan.

H13

The EIR does not provide any quantified analysis to demonstrate if the proposed project is within the employment forecasts of the General Plan. The project site is located within Focus Area 3: Cucamonga Station area of the General Plan EIR⁹. Table 5.14-6: Buildout Projections From Proposed Land Use Plan of the General Plan EIR demonstrates that the City will add 5,122 jobs in Industrial land use designations from 2020-2040. Table 1-1: Land Use Development Projections By Focus Area and Remainder of City for Buildout demonstrates that Focus Area 3: Cucamonga Station will add 24 Industrial jobs from 2020-2040. The EIR’s calculation of 289 net new jobs represents a 1,104% increase above the General Plan’s projections for the entire Focus Area 3: Cucamonga Station area and 5.6% of all jobs within Industrial designated lands. A single project accounting for this amount of the projected employment growth over 20 years represents a significant amount of growth. The proposed project exceeds the growth accounted for Focus Area 3: Cucamonga Station by the General Plan EIR and represents a significant amount of employment growth for the entire Industrial designated lands accounted for by the General Plan EIR. A revised EIR must be prepared to provide this information for analysis and include a finding of significance because the project would directly induce substantial unplanned growth in an area.

⁸ 9th and Vineyard Development Project <https://ceqanet.opr.ca.gov/2019110456/4>

⁹ https://www.cityofrc.us/sites/default/files/2021-09/City%20of%20Rancho%20Cucamonga_GP%20Update%20and%20CAP_Draft%20EIR_September%202021.pdf

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The EIR finds that impacts to population and housing will not be significant without providing any meaningful quantified analysis or evidence to support this conclusion. The EIR does not provide any evidence that the locally available workforce is qualified for or interested in work in the construction and/or industrial sector. Without this supporting evidence, the project must rely on the entire unemployed labor force within the greater Inland Empire region to fill the project's construction and operational jobs. This will increase VMT and emissions during all phases of construction and operations and a revised EIR must be prepared to account for longer worker trip distances.

H13

4.17 Transportation

Appendix K-2: TIS LOS Report models the proposed project as "Custom" land uses to calculate the project's average daily trip generation. The EIR misleads the public and decision makers by obfuscating the project's transportation impacts by inaccurately modeling the project as a "Custom" land use within Appendix K. The Project Description clearly states the operational uses of the project will provide specific uses, such as a Production Center (PC), Distribution Center (DC), and an Automated Storage and Retrieval System (ASRS), and project operations will include receiving, "inbound trucks that bring in products to the facility for sorting and re-distributing."

This "Custom" land use analysis does not disclose the methodology or source data that contributed to the "Custom" analysis. This does not comply with CEQA's requirements for meaningful disclosure and adequate informational documents. Utilizing this "Custom" land use analysis only serves to artificially skew the project's impacts downwards and result in reduced and/or less than significant findings. It is clear that the project buildings are designed and intended for use as a high cube fulfillment sort facility. The Project Description includes development of a Distribution Center and an Automated Storage and Retrieval System (ASRS); both of these use types are high-cube fulfillment sort facilities, which is the most intensive industrial building type defined by the ITE. The EIR must be revised to accurately model the proposed project as a high cube fulfillment sort facility and update all associated sections of environmental analysis.

H14

The EIR concludes that, "As shown on Table 4.17-5(c), baseline project-generated VMT per employee of 18.3 exceeds the City-established threshold of 17.4 VMT per employee. To reduce the baseline project-generated VMT to a less than significant level, baseline project-generated VMT must be reduced by 0.9 VMT per employee, or approximately 4.9 percent as shown in Table 4.17-5(d). The VMT Study therefore recommended Mitigation Measure TRA-1 to reduce project VMT below the City's adopted standard. The proposed Project is forecast to result in a significant VMT impact based on the City established thresholds for baseline project-generated VMT. Cumulative project-generated VMT and the cumulative project effect on VMT is forecast to be less than significant based on City established thresholds. With Mitigation Measure TRA-1,

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project VMT impacts would be less than significant under either the Phase 1 plus Phase 2A scenario or the Phase 1 plus Phase 2B scenario.”

However, the EIR has not provided meaningful evidence to support the conclusion that MM TRA-1 will reduce project generated VMT by 4.9% continuously for the life of the project. Since future building tenants are unknown, implementation of trip reduction measures cannot be guaranteed to reduce Project-generated VMT. It is not possible for the City to ensure that MM TRA-1 will result in reduced VMT by project employees and be implemented continuously, at all times, through the cumulative buildout year (2040) of the project. The efficacy of the proposed mitigation measures and reduction of VMT impacts below the applicable thresholds cannot be assured and the project’s VMT impact is therefore considered significant and unavoidable. A revised EIR must be prepared to include a finding of significance because there is no possible assurance of the percentage of project employees that would utilize non-automobile travel associated with implementation of MM TRA-1 and mitigation of the project’s VMT impact to less than significant is not feasible.

H15

Further, the EIR has underreported the quantity VMT generated by the proposed project operations. The operational nature of industrial/warehouse uses involves high rates of truck/trailer/delivery van VMT. Once employees arrive at work at the proposed project, they will conduct their jobs by driving trucks/trailers/delivery vans across the region as part of the daily operations as a Distribution Center and ASRS, which will drastically increase project-generated VMT. The project’s truck/trailer and delivery van activity is unable to utilize public transit or active transportation and it is misleading to the public and decision makers to exclude this activity from VMT analysis. The project’s total operational VMT generated is further inconsistent with the significance threshold and legislative intent of SB 743 to reduce greenhouse gas emissions by reducing VMT. A revised EIR must be prepared to reflect a quantified VMT analysis that includes all truck/trailer and delivery van activity.

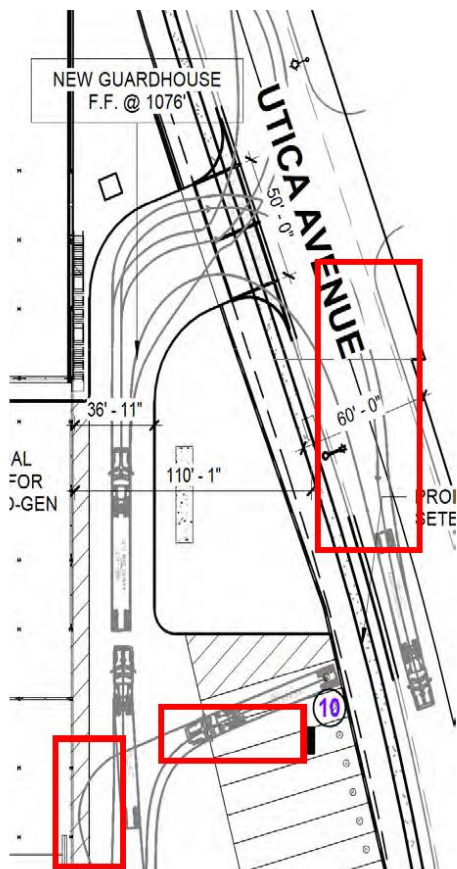
The EIR has not adequately analyzed the project’s potential to substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses; or the project’s potential to result in inadequate emergency access. There are no dedicated exhibits adequately depicting the available maneuvering and queueing space for trucks/trailers at the intersection of the project driveways and the adjacent streets. There are also no dedicated exhibits adequately depicting the onsite turning radius available for trucks maneuvering throughout the site. The EIR states that, “It should be noted the new semicircular road will intersect Haven Avenue and 6th Street at right angles so neither intersection would be skewed, and both have *good* site access from the two new driveways (no obstructions or nearby curves). The proposed site plan does not contain any unusual roadway or intersection geometries, curves, corners, or intersections that would result in any substantial safety hazard.” The notion of “good” site access is not defined

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or supported by meaningful evidence to support a less than significant finding, and the EIR must be revised to include a finding of significance.

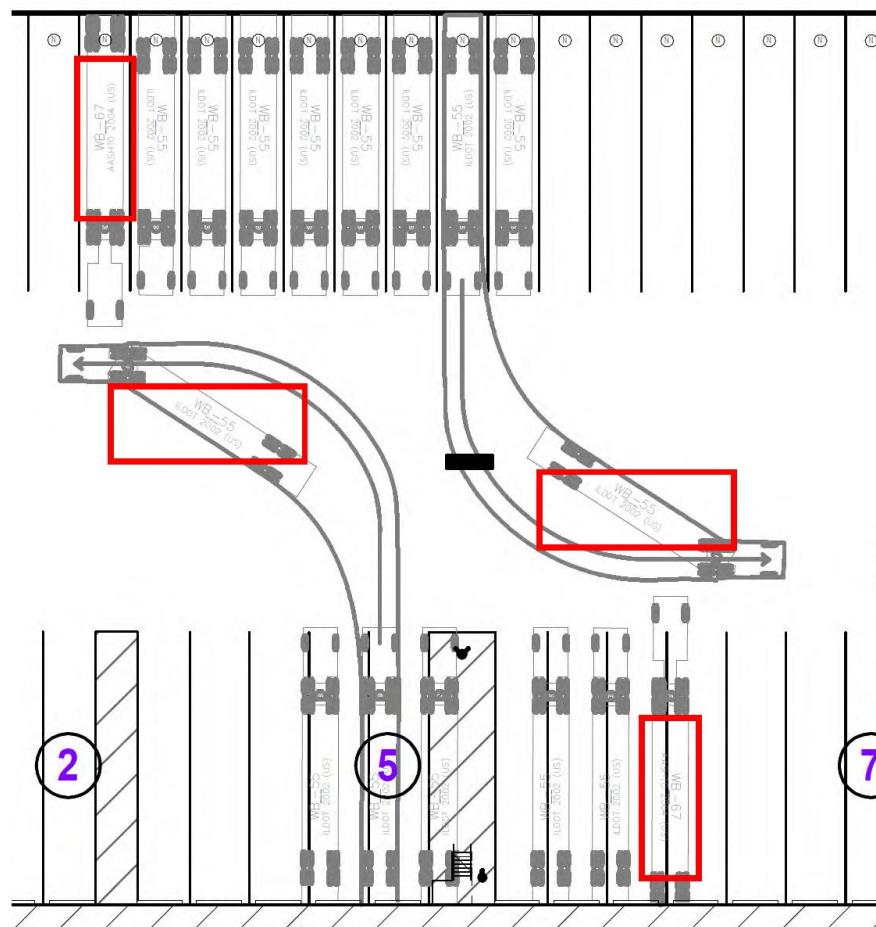
The EIR buries a Site Plan exhibit that has some truck/trailer modeling within Appendix K-3 TIS Appendices. Attachment A: Site Plan within Appendix K-3 depicts several areas of potential conflict between vehicles. For example, trucks exiting the site via the driveway on Utica Avenue require additional maneuvering space across the centerline of each street, meaning that the truck will need to drive on the “wrong side” of the street into oncoming traffic in order to leave the site. Further, the design and layout of the truck/trailer parking stalls cannot accommodate truck/trailer maneuvering as the truck depicted here requires the area of the adjacent parking stall in order to enter/exit its own parking stall. The design and layout of this area is also inadequate to accommodate truck/trailer maneuvering as the truck is depicted to turn onto a hatched non-vehicular area.



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Further, the design and layout of the truck/trailer loading dock court and parking stalls on the north side of the predict site cannot accommodate truck/trailer maneuvering. The exhibit avoids modeling a WB-67 truck (a standard 72 feet in length) maneuvering at the loading dock while another WB-67 truck is parked at the adjacent parking stalls. The exhibit only models a WB-55 (shorter truck) maneuvering at the loading dock while a WB-67 is parked in the parking stall, and vice versa, in order to avoid depicting that the site cannot accommodate maneuvering of multiple WB-67 trucks.



H17

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A revised EIR must be prepared to include a finding of significance as the EIR has not provided any meaningful evidence to support a less than significant finding.

H17

The EIR states regarding emergency access that, “The Project site and buildings would be accessible via all four of the perimeter streets depending on what building or location emergency responders needed to access (i.e., there are access driveways on all four perimeter street)(see Exhibit 4.17-4, Emergency Access Plan) as well as drive aisles around the new onsite buildings. The Project plans also show the site has adequate fire department access around all of the proposed buildings regardless of which Phase 2A or Phase 2B is actually constructed. Therefore, impacts relative to emergency access *could* be less than significant and no mitigation is required.” This does not comply with CEQA’s requirements for adequate informational documents and meaningful disclosure (CEQA § 15121 and 21003(b)). The EIR has not provided any details regarding the requirements for emergency access or meaningful analysis of the project’s compliance or noncompliance with these requirements. Providing an exhibit depicting a fire access lane on the site does not equate to meeting all emergency access requirements. Deferring this environmental analysis required by CEQA to the construction permitting phase is improper mitigation and does not comply with CEQA’s requirement for meaningful disclosure and adequate informational documents. A revised EIR must be prepared to include a finding of significance as the EIR has not provided any meaningful evidence to support a less than significant finding.

H18

5.0 Alternatives

The EIR is required to evaluate a reasonable range of alternatives to the proposed project which will avoid or substantially lessen any of the significant effects of the project (CEQA § 15126.6). The alternatives chosen for analysis include the CEQA required “No Project/No Development” alternative and only three others - Alternative 1: Expand Existing Facility, Alternative 2: Reduced Intensity, and Alternative 3: Mixed Use (C/O/R). The EIR does not evaluate a reasonable range of alternatives as only three alternatives beyond the required No Project alternative are analyzed. The EIR does not include an alternative that meets the project objectives and also eliminates all of the project’s significant and unavoidable impacts. The EIR must be revised to include analysis of a reasonable range of alternatives and foster informed decision making (CEQA § 15126.6). This must include alternatives such as development of the site with a project that reduces all of the proposed project’s significant and unavoidable impacts to less than significant levels.

H19

6.2 Growth-Inducing Effects

A revised EIR must be prepared to include an accurate cumulative analysis discussion here to demonstrate the impact of the proposed project in a cumulative setting. The EIR does not include any information regarding the buildout conditions of the City’s General Plan in order to provide an adequate and accurate environmental analysis. The EIR must be revised to provide the horizon year of the City’s current adopted General Plan, the total developable building floor area analyzed

H20

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within the 21st Century Employment District land use designation, and cumulative development since adoption of the General Plan to ensure that the proposed project is within the General Plan EIR's analysis, particularly since the EIR tiers from the General Plan EIR. Notably, Table 5.3-8: Land Use Assumptions for Air Quality Modeling in 2040 Buildout Scenario within the General Plan EIR states that the General Plan will accommodate the new construction of 2,408,000 square feet of warehouse and distribution building area and 1,719,200 square feet of manufacturing building area. Based on Table 3-4: Land Uses by Type and Phase within the EIR, the project will construct 539,885 square feet of warehouse building area, which is 22.4% of the General Plan buildout through 2040. Assuming the project's 52,470 square feet of light industrial building area is all attributed to the manufacturing process, this accounts for 3% of the General Plan buildout through 2040. This is significant amount of growth to be attributed to a single project. The EIR has not demonstrated that the proposed project is within the General Plan buildout scenario, including all cumulative development constructed since approval of the General Plan, approved projects not yet constructed, and "projects in the pipeline." A revised EIR must be prepared to include this analysis in order to provide an adequate and accurate environmental analysis.

H20

As noted throughout this comment letter, the project represents a significant amount of growth in the City. The project site is located within Focus Area 3: Cucamonga Station area of the General Plan EIR¹⁰. Table 5.14-6: Buildout Projections From Proposed Land Use Plan of the General Plan EIR demonstrates that the City will add 5,122 jobs in Industrial land use designations from 2020-2040. Table 1-1: Land Use Development Projections By Focus Area and Remainder of City for Buildout demonstrates that Focus Area 3: Cucamonga Station will add 24 Industrial jobs from 2020-2040. The EIR's calculation of 289 net new jobs represents a 1,104% increase above the General Plan's projections for the entire Focus Area 3: Cucamonga Station area and 5.6% of all jobs within Industrial designated lands. A single project accounting for this amount of the projected employment growth over 20 years represents a significant amount of growth. The proposed project exceeds the growth accounted for Focus Area 3: Cucamonga Station by the General Plan EIR and represents a significant amount of employment growth for the entire Industrial designated lands accounted for by the General Plan EIR. A revised EIR must be prepared to provide this information for analysis and include a finding of significance because the project would directly induce substantial unplanned growth in an area.

H21

The EIR also states here that the jobs generated by the proposed project are, "...less than the 3,376 unemployed persons within the City as estimated by the EDD, however, the Project could spur an indirect boost in population since Project employees could come from existing City unemployment

H22

¹⁰ https://www.cityofrc.us/sites/default/files/2021-09/City%20of%20Rancho%20Cucamonga_GP%20Update%20and%20CAP_Draft%20EIR_September%202021.pdf

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numbers or from workers in the surrounding region.” The EIR does not provide any evidence that the City’s unemployed workforce is qualified for or interested in work in the industrial sector. Without this supporting evidence, the project must rely on the entire unemployed labor force within the greater Inland Empire region to fill the project’s construction and operational jobs. This will increase VMT and emissions during all phases of construction and operations and a revised EIR must be prepared to account for longer worker trip distances. The EIR must be revised to include a finding of significance as it has not provided any meaningful evidence to support a less than significant finding.

H22

Conclusion

For the foregoing reasons, GSEJA believes the EIR is flawed and a revised EIR must be prepared for the proposed project and circulated for public review. Golden State Environmental Justice Alliance requests to be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. Send all communications to Golden State Environmental Justice Alliance P.O. Box 79222 Corona, CA 92877.

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Sincerely,



Vashon Simien

Blum, Collins & Ho, LLP

Attachments:

1. SWAPE Technical Analysis



Technical Consultation, Data Analysis and
Litigation Support for the Environment

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June 9, 2025

Gary Ho
Blum, Collins & Ho LLP
707 Wilshire Blvd, Ste. 4880
Los Angeles, CA 90017

Subject: Comments on the El Camino Project (SCH No. 2023080369)

Dear Mr. Ho:

We have reviewed the April 2025 Draft Environmental Impact Report ("DEIR") for the El Camino ("Project") located in the City of Rancho Cucamonga. The Project proposes to demolish up to 237,895 square feet ("SF") of existing on-site buildings and construct approximately 1,054,541-SF of new manufacturing, light industrial, and office space, including 475 auto parking stalls and 87 trailer parking stalls, on the 30.1-acre site.

Our review concludes that the DEIR may not properly evaluate the Project's air quality, health risk, and greenhouse gas ("GHG") impacts. As a result, emissions and health risk impacts associated with the construction and operation of the proposed Project may be inadequately addressed. A revised Environmental Impact Report ("EIR") should be prepared to reassess and, if necessary, mitigate the potential air quality, health risk, and greenhouse gas impacts that the Project may have on the environment.

H24

Air Quality

Implementation of All Feasible Mitigation to Reduce Emissions

The DEIR's air quality analysis relies on emissions calculated with the California Emissions Estimator Model Version 2022.1 (p. 4.5-9). Based on these estimates the DEIR claims that the Project's operational emissions and Phase 2 construction emissions of nitrogen oxides ("NO_x") would be significant and unavoidable (p. 4.3-64). We agree that the Project would result in a significant impacts, however, the DEIR's assertion that this impact is significant-and-unavoidable may be unsubstantiated.

H25

According to CEQA Guidelines § 15096(g)(2), an impact can only be labeled as significant-and-unavoidable after all available, feasible mitigation is considered.¹ While the DEIR implements Mitigation Measure (“MM”) AIR-2A through 2E, additional feasible mitigation measures exist that could further reduce these emissions (p. 2-6, 2-7). In our opinion, additional feasible mitigation measures should be considered, such as those suggested in the section of this letter titled “Feasible Mitigation Measures Available to Reduce Emissions.” The Project should not be approved until a revised EIR is prepared that, if necessary, incorporates additional feasible mitigation that reduce emissions to the maximum extent possible to comply with CEQA guidance.

H25

Health Risk Impacts of Warehouses on Surrounding Communities

Upon review of the DEIR and associated documents, we have determined that the development of the proposed Project may contribute to the disproportionate health risk impacts that warehouses pose to community members living, working, and going to school within the immediate area of the Project site. According to the South Coast Air Quality Management District (“SCAQMD”), “[t]hose living within a half mile of warehouses are more likely to include communities of color, have health impacts such as higher rates of asthma and heart attacks, and a greater environmental burden.”²

In particular, the SCAQMD found that more than 2.4 million people live within a half-mile radius of at least one warehouse, and that those areas not only experience increased rates of asthma and heart attacks, but are also disproportionately Black and Latino communities below the poverty line.³ Another study similarly indicates that “neighborhoods with lower household income levels and higher percentages of minorities are expected to have higher probabilities of containing warehousing facilities.”⁴ Additionally, a report authored by the Inland Empire-based People’s Collective for Environmental Justice and University of Redlands states:

H26

“As the warehouse and logistics industry continues to grow and net exponential profits at record rates, more warehouse projects are being approved and constructed in low-income communities of color and serving as a massive source of pollution by attracting thousands of polluting truck trips daily. Diesel trucks emit dangerous levels of nitrogen oxide and particulate matter that cause devastating health impacts including asthma, chronic obstructive pulmonary

¹ “Cal. Code Regs. tit. 14 § 15096.” Cornell Law School, *available at*:

[https://www.law.cornell.edu/regulations/california/14-CCR-15096#:~:text=14%2C%20%2A7%2015096%20%2D%20Process%20for%20a%20Responsible%20Agency,-State%20Regulations&text=\(a\)%20General,to%20approve%20the%20project%20involved](https://www.law.cornell.edu/regulations/california/14-CCR-15096#:~:text=14%2C%20%2A7%2015096%20%2D%20Process%20for%20a%20Responsible%20Agency,-State%20Regulations&text=(a)%20General,to%20approve%20the%20project%20involved).

² “South Coast AQMD Governing Board Adopts Warehouse Indirect Source Rule.” SCAQMD, May 2021, *available at*: <http://www.aqmd.gov/docs/default-source/news-archive/2021/board-adopts-waisr-may7-2021.pdf?sfvrsn=9>.

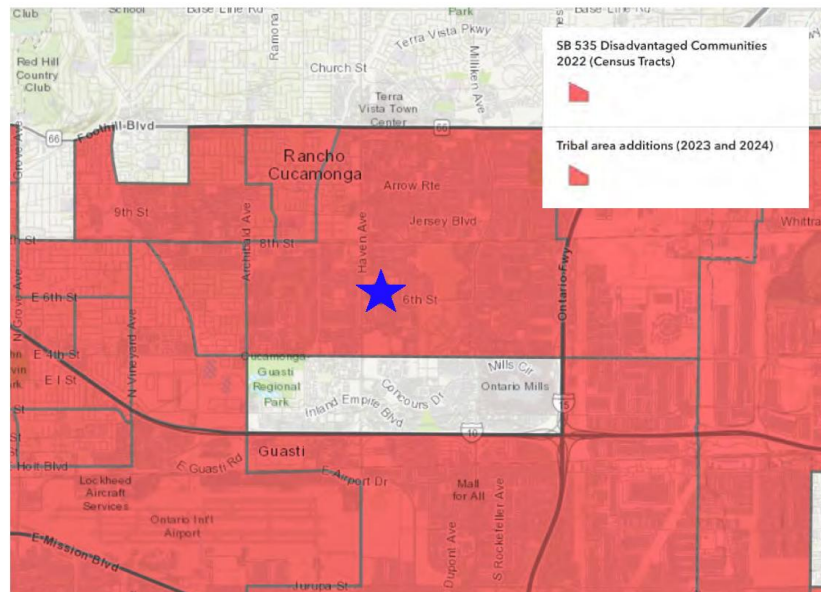
³ “Southern California warehouse boom a huge source of pollution. Regulators are fighting back.” Los Angeles Times, May 2021, *available at*: <https://www.latimes.com/california/story/2021-05-05/air-quality-officials-target-warehouses-bid-to-curb-health-damaging-truck-pollution>.

⁴ “Location of warehouses and environmental justice: Evidence from four metros in California.” Metro Freight Center of Excellence, January 2018, *available at*: https://www.metrotrans.org/assets/research/MF%201.1g_Location%20of%20warehouses%20and%20environmental%20justice_Final%20Report_021618.pdf, p. 21.

disease (COPD), cancer, and premature death. As a result, physicians consider these pollution-burdened areas 'diesel death zones.'"⁵

The ongoing growth of industrial warehouses in these communities raises important environmental justice concerns. Despite the potential public health impacts, warehouse development continues to rapidly expand.

According to CalEnviroScreen's Senate Bill ("SB") 535 Disadvantaged Communities Map, the Project site is located in a designated disadvantaged community (see screenshot below).⁶



H26

SB 535 provides funding for development projects that provide a benefit to disadvantaged communities. The California Environmental Protection Agency has been given the responsibility for identifying those communities based on "geographic, socioeconomic, public health, and environmental hazard criteria."⁷ As the Project site is located in a designated disadvantaged community, the

⁵ "Warehouses, Pollution, and Social Disparities: An analytical view of the logistics industry's impacts on environmental justice communities across Southern California." People's Collective for Environmental Justice, April 2021, available at: https://earthjustice.org/sites/default/files/files/warehouse_research_report_4.15.2021.pdf, p. 4.

⁶ "SB 535 Disadvantaged Communities (2022 Update)." California Environmental Protection Agency, available at: <https://experience.arcgis.com/experience/1c21c53da8de48f1b946f3402fbae55c/page/SB-535-Disadvantaged-Communities>

⁷ "Final Designation of Disadvantaged Communities." California Environmental Protection Agency, available at: https://calepa.ca.gov/wp-content/uploads/sites/6/2022/05/Updated-Disadvantaged-Communities-Designation-DAC-May-2022-Eng.a.hp_-1.pdf?emrc=e05e10.

development of the proposed Project would contribute to the disproportionate impact warehouses are posing to the health conditions of nearby residents.

Regarding the increased sensitivity of early-life exposures to inhaled pollutants, the California Air Resources Board (“CARB”) states:

“Children are often at greater risk from inhaled pollutants, due to the following reasons:

- Children have unique activity patterns and behavior. For example, they crawl and play on the ground, amidst dirt and dust that may carry a wide variety of toxicants. They often put their hands, toys, and other items into their mouths, ingesting harmful substances. Compared to adults, children typically spend more time outdoors and are more physically active. Time outdoors coupled with faster breathing during exercise increases children’s relative exposure to air pollution.
- Children are physiologically unique. Relative to body size, children eat, breathe, and drink more than adults, and their natural biological defenses are less developed. The protective barrier surrounding the brain is not fully developed, and children’s nasal passages aren’t as effective at filtering out pollutants. Developing lungs, immune, and metabolic systems are also at risk.
- Children are particularly susceptible during development. Environmental exposures during fetal development, the first few years of life, and puberty have the greatest potential to influence later growth and development.”⁸

H26

A Stanford-led study reveals that children exposed to high levels of air pollution are more susceptible to respiratory and cardiovascular diseases in adulthood.⁹ Given children’s higher propensity to succumb to the negative health impacts of air pollutants, and as warehouses release more smog-forming pollution than any other sector, it is necessary to evaluate the specific health risk that warehouses pose to children in the nearby community.

According to the above-mentioned study by the People’s Collective for Environmental Justice and University of Redlands, there are 640 schools in the South Coast Air Basin that are located within half a mile of a large warehouse, most of them in socio-economically disadvantaged areas.¹⁰ Regarding the proposed Project itself, the DEIR states:

⁸ “Children and Air Pollution.” CARB, available at: <https://ww2.arb.ca.gov/resources/documents/children-and-air-pollution>.

⁹ “Air pollution puts children at higher risk of disease in adulthood, according to Stanford researchers and others.” Stanford, February 2021, available at: <https://news.stanford.edu/2021/02/22/air-pollution-impacts-childrens-health/>.

¹⁰ “Warehouses, Pollution, and Social Disparities: An analytical view of the logistics industry’s impacts on environmental justice communities across Southern California.” People’s Collective for Environmental Justice, April 2021, available at: https://earthjustice.org/sites/default/files/files/warehouse_research_report_4.15.2021.pdf, p. 4.

“A Day care/pre-school is located near the southeast corner of the site, just east of Utica Ave. and just north of 6th street” (p. 3-10).

As discussed, a daycare/preschool is located adjacent to the Project site. This may pose a significant threat because, as outlined above, children are a vulnerable population that are more susceptible to the damaging side effects of air pollution. The Project may therefore contribute to the detrimental short-term and long-term health impacts that warehouses pose on local children if approved.

In our opinion, a revised EIR should be prepared to assess the Project’s contribution to the disproportionate impacts that warehouse developments impose on the community surrounding the Project site. This analysis should specifically consider the effects on children and communities of color who live and attend school in the area. To accurately characterize the cumulative air quality impacts from multiple warehouse projects proposed or constructed within a one-mile radius, the revised EIR should include a cumulative health risk assessment. This assessment should quantify the potential adverse health outcomes resulting from exposure to multiple sources of pollution in combination with the already poor ambient air quality in the Project’s census tract.

H27

Greenhouse Gas

Evaluation of Greenhouse Gas Impacts

The DEIR estimates that the Project would result in a net increase in annual greenhouse gas (“GHG”) mitigated emissions of 29,575.4 and 40,965.7 metric tons of carbon dioxide equivalents per year (“MT CO₂e/year”) from Phase 1 and 2, respectively (p. 4.8-32, Table 4.8-10). This would exceed the applicable GHG threshold of 10,000 MTCO₂e/year. The GHG Assessment consequently concludes that the Project would result in a significant and unavoidable GHG impact after the implementation of MMs GHG-1 and GHG-2 (p. 4.8-32).

The DEIR is required under CEQA to implement all feasible mitigation to reduce impacts to the maximum extent feasible, as previously mentioned.¹¹ While the DEIR includes MM GHG-1 and MM GHG-2, it may not incorporate all feasible mitigation measures that could further reduce the Project’s GHG emissions. To further reduce the Project’s GHG impacts, additional feasible mitigation measures—such as those outlined in the section of this letter titled “Feasible Mitigation Measures Available to Reduce Emissions”—should be considered. We recommend that a revised EIR be prepared to incorporate these measures, if necessary, and evaluate their potential to reduce emissions to less-than-significant levels prior to Project approval.

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¹¹ “Cal. Code Regs. tit. 14 § 15096.” California Legislature, available at: <https://casetext.com/regulation/california-code-of-regulations/title-14-natural-resources/division-6-resources-agency/chapter-3-guidelines-for-implementation-of-the-california-environmental-quality-act/article-7-eir-process/section-15096-process-for-a-responsible-agency>.

Mitigation

Feasible Mitigation Measures Available to Reduce Emissions

The DEIR is required under CEQA to implement all feasible mitigation to reduce the Project's potential impacts. The DEIR shows that the Project would result in potentially significant air quality and GHG impacts that should be mitigated to the greatest extent possible. We propose additional mitigation measures below for the consideration.

First, to reduce the NO_x emissions associated with Project construction and operation, we recommend a future EIR consider incorporating several mitigation measures (see below).

Southern California Association of Governments ("SCAG")'s 2020 RTP/SCS Program Environmental Impact Report ("PEIR") recommends the several *Air Quality Project Level Mitigation Measures*, which are applicable to the Project. These include minimizing unnecessary vehicular and machinery activities, requiring contractors to assemble a comprehensive inventory list, and using SCAQMD "SOON" funds to purchase commercially available, low-emission heavy-duty engines.¹²

CARB recommends:¹³

- Ensuring the cleanest possible construction practices and equipment are used;
- Requiring all heavy-duty trucks entering the construction site during the grading and building construction phases be model year 2014 or later. All heavy-duty haul trucks should also meet CARB's lowest optional low-oxides of nitrogen standard starting in the year 2022;
- Require all construction equipment and fleets to be in compliance with all current air quality regulations;
- Requiring all service equipment (e.g., yard hostlers, yard equipment, forklifts, and pallet jacks) used within the project site to be zero-emission; and
- Requiring the installing of vegetative walls or other effective barriers that separate loading docks and people living or working nearby.

The California Department of Justice ("CA DOJ") recommends keeping all maintenance records and data sheets, conducting on site inspections to verify compliance, and providing on site meal options to monitor and reduce emissions.¹⁴

¹² "4.0 Mitigation Measures." Connect SoCal Program Environmental Impact Report Addendum #1, September 2020, available at: https://scag.ca.gov/sites/main/files/file-attachments/fpeir_connectsocial_addendum_4_mitigationmeasures.pdf?1606004420, p. 4.0-2 – 4.0-10; 4.0-19 – 4.0-23; See also: "Certified Final Connect SoCal Program Environmental Impact Report." SCAG, May 2020, available at: <https://scag.ca.gov/peir>.

¹³ "Recommended Air Pollution Emission Reduction Measures for Warehouses and Distribution Centers." CARB, August 2023, available at: <https://ww2.arb.ca.gov/sites/default/files/2023-08/CARB%20Comments%20-%20NOP%20for%20the%20%20Oak%20Valley%20North%20Project%20DEIR.pdf>; Attachment A, p. 5 – 8.

¹⁴ "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act." State of California Department of Justice, September 2022, available at: <https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf>, p. 8 – 10.

SCAQMD staff recommends using zero-emissions or near-zero emission on-road haul trucks, such as heavy-duty trucks with natural gas engines that meet the CARB's NO_x emissions standard at 0.02 grams per brake horsepower-hour, and creating a phase-in schedule to incentivize the use of cleaner operating trucks.¹⁵ They also recommend the use of, at least, a 2010 model year that meets CARB's 2010 engine emissions standards.

Second, in order to reduce the GHG emissions associated with the Project, we recommend several mitigation measures (see below).

SCAG's 2020 RTP/SCS PEIR recommends *Greenhouse Gas Project Level Mitigation Measures*, which are applicable to the Project. These include improving transit access, implementing commute trip reduction marketing, adopting employer trip reduction strategies such as vanpool and transit programs, requiring non-diesel backup generators, and staff training.¹⁶

The CA DOJ recommends:¹⁷

- Requiring all stand-by emergency generators to be powered by a non-diesel fuel;
- Requiring that every tenant train its staff in charge of keeping vehicle records in diesel technologies and compliance with CARB regulations, by attending CARB-approved courses. Also require facility operators to maintain records on-site demonstrating compliance and make records available for inspection by the local jurisdiction, air district, and state upon request; and
- Requiring tenants to enroll in the United States Environmental Protection Agency's SmartWay program, and requiring tenants who own, operate, or hire trucking carriers with more than 100 trucks to use carriers that are SmartWay carriers.

CEQA Guidelines 15126.4 (c)(3) include "[o]ffsite measures, including offsets that are not otherwise required, to mitigate a project's emissions" as an option for GHG mitigation.¹⁸ An example of this was in the case of the Oakland Sports and Mixed-Use Project, where off-site reduction measures in the

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¹⁵ "Draft Environmental Impact Report (EIR) for the Proposed CADO Menifee Industrial Warehouse Project (Proposed Project)." SCAQMD, April 2024, available at: <https://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2024/april-2024/RVC240313-05.pdf?sfvrsn=8>, p. 2 - 3.

¹⁶ "4.0 Mitigation Measures." Connect SoCal Program Environmental Impact Report Addendum #1, September 2020, available at: https://scag.ca.gov/sites/main/files/file-attachments/fpeir_connectsocial_addendum_4_mitigationmeasures.pdf?1606004420, p. 4.0-20 – 4.0-23; See also: "Certified Final Connect SoCal Program Environmental Impact Report." SCAG, May 2020, available at: <https://scag.ca.gov/peir>.

¹⁷ "Recommended Air Pollution Emission Reduction Measures for Warehouses and Distribution Centers." CARB, August 2023, available at: <https://ww2.arb.ca.gov/sites/default/files/2023-08/CARB%20Comments%20-%20NOP%20for%20the%20Oak%20Valley%20North%20Project%20DEIR.pdf>; Attachment A, p. 9 – 10.

¹⁸ "Cal. Code Regs. tit. 14 § 15126.4." CEQA Guidelines, May 2024, available at: <https://casetext.com/regulation/california-code-of-regulations/title-14-natural-resources/division-6-resources-agency/chapter-3-guidelines-for-implementation-of-the-california-environmental-quality-act/article-9-contents-of-environmental-impact-reports/section-151264-consideration-and-discussion-of-mitigation-measures-proposed-to-minimize-significant-effects>.

neighboring communities were recommended.¹⁹ We recommend consideration of local carbon offset programs to reduce the Project's GHG impacts as a measure of last result.

We have provided several mitigation measures that would reduce Project-related NO_x and GHG emissions developed from sources including SCAG, the CA DOJ, and others. We recommend that a revised EIR be prepared to consider them and, if feasible, incorporate them into a revised EIR alongside updated air quality and GHG analyses. The revised EIR should, if necessary, clearly demonstrate a commitment to implementing these measures prior to Project approval, to ensure that the Project's potentially significant emissions are effectively minimized to the maximum extent feasible.

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Disclaimer

SWAPE has received limited documentation regarding this project. Additional information may become available in the future; thus, we retain the right to revise or amend this report when additional information becomes available. Our professional services have been performed using that degree of care and skill ordinarily exercised, under similar circumstances, by reputable environmental consultants practicing in this or similar localities at the time of service. No other warranty, expressed or implied, is made as to the scope of work, work methodologies and protocols, site conditions, analytical testing results, and findings presented. This report reflects efforts which were limited to information that was reasonably accessible at the time of the work, and may contain informational gaps, inconsistencies, or otherwise be incomplete due to the unavailability or uncertainty of information obtained or provided by third parties.

Sincerely,



Matt Hagemann, P.G., C.Hg.



Paul E. Rosenfeld, Ph.D.

¹⁹ "Cal. Pub. Resources Code § 21168.6.7." 2023, available at: <https://casetext.com/statute/california-codes/california-public-resources-code/division-13-environmental-quality/chapter-6-limitations/section-2116867-oakland-sports-and-mixed-use-project-conditions-for-approval-certification-of-project-for-streamlining>.

ID	Response to Comment Letter H – BC&H LLC (GSEJA) + SWAPE
H-1	The City acknowledges receipt of comments from the Golden State Environmental Justice Alliance (GSEJA). It should be noted these responses include additional comments from the Soil/Water/Air Protection Enterprise (SWAPE).
H-2	This comment provides a summary of the proposed El Camino Project and its various development characteristics and requested entitlements. No additional response is needed.
H-3	The commenter asserts that a revised EIR is necessary because the EIR's energy calculations were not estimated using a California Energy Commission (CEC)-approved 2022 Energy Code compliance modeling software. The commenter is incorrect for four reasons. First, CEC compliance modeling software is only used for projects that elect to use the performance-based approach (energy budget) to compliance with the Energy Code. As described in the DEIR (p. 4.6-34), buildings subject to Energy Code requirements may choose to comply with either prescriptive- or performance-based standards. Thus, the use of compliance modeling software is contingent on the method of compliance. Second, the use of compliance modeling software is required as part of a final design submittal for a building permit, but is not required during the CEQA review stage. The use of compliance modeling software during the CEQA review process is premature because site and building design plans may not be finalized and the specific factors necessary to accurately use the compliance modeling software, such as the solar performance of specific window treatments, are not known. Third, as noted in the DEIR, building energy use was primarily estimated using historical energy consumption at similar facilities (p. 4.6-20), and other data used is based on CEC forecasts that predate the 2019 Energy Code (p. 4.6-34). Thus, the DEIR's energy analysis incorporates fact-based evidence for potential energy consumption by the proposed Project. Finally, the SCAQMD recommends using the CalEEMod software in CEQA documentation as the most appropriate method of characterizing energy use for land use development projects. However, in this case the analysis used energy consumption data from another beverage facility as described in Sections 4.3 (Air Quality) and 4.6 (Energy). For these reasons, the use of compliance modeling software at the CEQA review stage is not required for the Project.
H-4	The comment is correct regarding Project building heights relative to the Ontario International Airport (OIA) so the following information will be added to FEIR Section 5, Errata: DEIR Section 4.9.4, Impacts and Mitigation - HAZMAT-5 (Airports), Page 4.9-20, paragraph 4 and MM HAZ-3 <u>Map 2-4, Compatibility Policy Map, Airspace Protection Zones, in the Ontario International Airport Land Use Compatibility Plan (OIA LUCP) indicates the majority of the Project site is within the maximum 70 ft. building height in the High Terrain Zone and a portion of the site is within the maximum 70 ft. - 100 ft. building height area.</u> The Project also proposes several tall buildings on the site (i.e., ASRS is max. 130 feet and 70 feet average, PC building is max. 41 feet, and DC is max. 45 feet). These buildings are approximately 10,000 feet north-northeast of the closest ONT runway. Therefore, the Project will need to obtain clearance from the Federal Aviation Administration (FAA) and comply with its lighting/signage

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	restrictions and warning improvements. These potential restrictions are addressed in Mitigation Measure HAZ-3 below. <u>The Project applicant initiated consultation with the Federal Aviation Administration (FAA) Obstruction Evaluation / Airport Airspace Analysis (OE/AAA) Group which concluded on January 26, 2024. This consultation was to determine whether the construction or operation of the Project would affect the National Airspace System (NAS). The Project applicant provided site plan, building elevation, and topographical information to the FAA for their review through the FAA OE/AAA online portal. Email and telephone communication continued through June 11, 2024.</u> <u>The FAA determined that the main building structure would create no hazard on the NAS on April 4, 2024, and conditioned requirements such as prohibiting strobe lighting with which the Project will comply. The Project would require the use of a crane during its construction, which the FAA determined (on June 11, 2024), that the crane, as a temporary structure, would create no hazard on the NAS.</u> <u>As a result, the construction and operation of the Project would not create a hazard on the NAS and a less than significant impact would occur with the implementation of the required lighting restrictions as conditioned by the FAA.</u> In addition, on various dates from April to June, 2024 the FAA issued 23 separate “determination of no hazard to air navigation” to the Project applicant covering all of the various proposed buildings and improvements of the proposed project. These determinations all stated the following: <i>The Federal Aviation Administration has conducted an aeronautical study under the provisions of 49 U.S.C., Section 44718 and if applicable Title 14 of the Code of Federal Regulations, part 77...This aeronautical study revealed that the structure would have no substantial adverse effect on the safe and efficient utilization of the navigable airspace by aircraft or on the operation of air navigation facilities. Therefore, pursuant to the authority delegated to me, it is hereby determined that the structure would not be a hazard to air navigation provided the following condition(s) is(are) met:</i> <i>As a condition to this Determination, the structure is to be marked/lighted in accordance with FAA Advisory circular 70/7460-1 M, Obstruction Marking and Lighting, red lights-Chapters 4,5(Red), &15.</i> <i>Any failure or malfunction that lasts more than thirty (30) minutes and affects a top light or flashing obstruction light, regardless of its position, should be reported immediately to (877) 487-6867 so a Notice to Air Missions (NOTAM) can be issued. As soon as the normal operation is restored, notify the same number.</i> These are included in <u>FEIR Appendix G, FAA Approval Materials.</u> As a result of this consultation with FAA, Mitigation Measure HAZ-3 will be modified as outlined below and included in Section 5, Errata: HAZ-3: FAA Lighting Hazards. A minimum of 45 days prior to submittal of an application for a building permit for the project, the applicant shall consult with the City of Rancho Cucamonga Planning Department in order to ~~determine whether any~~

ID	Response to Comment Letter H – BC&H LLC (GSEJA) + SWAPE
	~~implementing project related vertical structures will encroach into the 100-to-1 imaginary surface surrounding the ONT. If it is determined that there will be an encroachment into the 100-to-1 imaginary surface, the applicant shall file a FAA Form 7460-1, Notice of Proposed Construction or Alteration. If FAA determines that the implementing development project would potentially be an obstruction unless reduced to a specified height, the applicant and the City Planning Division will work with FAA to resolve any adverse effects on aeronautical operations including any demonstrate the Project is consistent with FAA lighting or other restrictions or prohibitions which may include but are not limited to the following:~~ a. Any use which would direct a steady light or flashing light of red, white, green, or amber colors associated with airport operations toward an aircraft engaged in an initial straight climb following takeoff or toward an aircraft engaged in a straight final approach toward a landing at an airport, other than an FAA-approved navigational signal light or visual approach slope indicator. b. Any use which would cause sunlight to be reflected towards an aircraft engaged in an initial straight climb following takeoff or towards an aircraft engaged in a straight final approach towards a landing at an airport. c. Any use which would generate smoke or water vapor or which would attract large concentrations of birds, or which may otherwise affect safe air navigation within the area. d. Any use which would generate electrical interference that may be detrimental to the operation of aircraft and/or aircraft instrumentation. e. All retention and water quality basins shall be designed to dewater within 48 hours of a rainfall event. Finally, regarding review of the City's updated General Plan in 2021 and ALUCP compliance, the Ontario International Airport – Inter Agency Collaborative (ONT-IAC) was formed to ensure that new development is compatible with the Ontario International Airport (ONT) Influence Area (AIA). The ONT-IAC implements the policies and criteria of the Airport Land Use Compatibility Plan (ALUCP) to prevent future incompatible land uses surrounding ONT and minimizing the public's exposure to excessive noise and safety hazards. The ALUCP does not address existing incompatible land uses and does not place any restrictions on the airport or its flight operations. ONT-IAC is represented by all agencies affected by existing and future airport impacts and administered by the City of Ontario. It's members include representatives from the County of San Bernardino and the cities of Chino, Fontana, Montclair, Ontario, Rancho Cucamonga, and Upland. This inter-agency partnership works to protect the public, health, safety and welfare and fulfill state requirements to protect the airport from encroachment of incompatible land uses and protect the areas around the airport from environmental impacts. https://www.ontarioca.gov/government/community-development/planning/planning-programs/ontario-international-airport-inter The Draft EIR for the General Plan was routed to the City of Ontario as standard practice since they are an adjacent agency which provided them an opportunity to speak to or highlight any concerns they had with the General Plan relative to the ALUCP. In addition, as part of the GP EIR NOP process, our consultant Raimi &

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	Associates conducted a series of 18 stakeholder interviews on February 5, 6 and 20, 2021. Invitations were sent to a number of stakeholders which included the City of Ontario. Among those stakeholders that participated in this interview process was the Ontario Convention Center and Visitors Bureau. This was the only organization affiliated with the City of Ontario that responded to the City's invitations. City staff did not receive any comments from Ontario on the General Plan, its DEIR or the FEIR. The City of Ontario provided no comments with regard to the ALUCP. Thus, Ontario had no concerns with our GP contradicting the ALUCP. This is further evidenced by the fact that the City also provided no comments on the El Camino Project EIR relative to the ALUCP. Here is the list of the NOP and responses to the NOP from the GP EIR: https://www.cityofrc.us/sites/default/files/2021-09/Appendix%202-2_NOP%20and%20NOP%20Comments.pdf Lastly, the ALUCP does not actually establish a maximum height limitation but rather the ALUCP states that IF a project exceeds indicated height limitations it is subject to FAA clearance which the developer obtained for the El Camino Project. This information will be added to Chapter 3, Errata, of the Final EIR for DEIR Section 4.9.4, Impacts and Mitigation - HAZMAT-5 (Airports), Page 4.9-20, paragraph 4 and MM HAZ-3 Conclusion: This additional information merely clarifies the information presented in the DEIR and does not change the conclusion or severity of impact of the Project on airports (less than significant with mitigation).
H-5	The comment states...A revised EIR must be prepared with a consistency analysis with all General Plan policies goals and policies..." That statement is incorrect, an EIR must only evaluate relevant GP goals and policies depending on the type and size of project, where it is located in the city, and what discretionary actions it will require from the city. This is clearly demonstrated by the following two court cases: Sequoyah Hills Homeowners Assn. v. City of Oakland (1993) 23 Cal.App.4th 704, 719. "Indeed, it is beyond cavil that no project could completely satisfy every policy stated in the OCP, and that state law does not impose such a requirement. (Greenebaum, supra, 153 Cal.App.3d at pp. 406–407, 200 Cal.Rptr. 237; 59 Ops.Cal.Atty.Gen. 129, 131 (1976).) A general plan must try to accommodate a wide range of competing interests—including those of developers, neighboring homeowners, prospective homebuyers, environmentalists, current and prospective business owners, jobseekers, taxpayers, and providers and recipients of all types of city-provided services—and to present a clear and comprehensive set of principles to guide development decisions." Holden v. City of San Diego (2019) 43 Cal.App.5th 404, 412. "The requirement that a project be consistent with a general plan does not require the project to rigidly conform to the general plan. (San Franciscans Upholding the Downtown Plan v. City and County of San Francisco (2002) 102 Cal.App.4th 656, 678, 125 Cal.Rptr.2d 745 (San Franciscans Upholding).) "State law does not require perfect conformity between a proposed project and the

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	applicable general plan” (Friends of Lagoon Valley v. City of Vacaville (2007) 154 Cal.App.4th 807, 817, 65 Cal.Rptr.3d 251.)” Of the 50 General Plan goals and policies cited by the commenter, the DEIR specifically examined project consistency with 29 (58%) of them and the remaining ones were not applicable to the project for various reasons (e.g., not a CEQA issue, was a city-wide issue, etc. – see below). The Master Plan itself addressed a number of goals and policies regarding community benefits. In this case, the El Camino Project is consistent with the General Plan land use designation and zoning classification for the site, so the goals and policies against which it must be evaluated are limited to those where the Project might have a significant unanticipated impact on some physical aspect of the city. Where there may be such conflict, the DEIR provided a text or tabular comparison of the Project to the appropriate goals and policies to determine if or to what degree the Project is consistent in the following sections: • Greenhouse Gas Emissions Table 4.8-11: Summary of Project Consistency with CAP Strategies • Land Use and Planning Table 4.11-2: 21st Century Employment District (21CED) Consistency Table 4.11-3: Master Plan Consistency Analysis Table 4.11-4: Consistency with SCAG 2024 Connect SoCal Goals • Transportation Table 4.17-3: General Plan Consistency Analysis Conclusion: this additional information merely clarifies the data and analyses presented in the DEIR and does not change the analyses, conclusions, or determination of the severity of impacts of the Project relative to applicable General Plan goals and policies.(i.e., less than significant with project design and regulatory compliance).
H-6	In response to this comment, the following information will be added to the DEIR and included in FEIR Chapter 3, Errata: DEIR Section 4.11, Land Use and Planning, 4.11.4, Impacts and Mitigation – IMPACT LAND-2, page 4.11-11 <u>The following General Plan designations apply to the Project site and its immediate vicinity in the City’s planning vision:</u> • <u>Figure V-2: Vision Diagram within the General Plan depicts the intersection of 6th Street and Haven Avenue as a City Center.</u> • <u>Figure LC-1: Vision Diagram (Community Activity Nodes) within the General Plan depicts the intersection of 6th Street and Haven Avenue as a Corridor Activity Node.</u> • <u>Figure M- 6: Pedestrian Focus Areas within the General Plan depicts the site as within a Pedestrian Focus Area.</u>

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	<u>Analysis: The site is northeast of 6th Street/Haven Avenue. The Project will introduce hundreds of new employees onto a site that is within walking distance to a variety of housing opportunities to the east and north, and many commercial establishments along Haven Avenue to the west and south. The Project will also have pedestrian circulation around its perimeter so as to not interfere with pedestrian movement in the larger surrounding area. In these ways the Project will be an integral part of and contribute to this area functioning as a City Center, a Corridor Activity Node, and a Pedestrian Focus Area. Potential impacts would be less than significant and no mitigation is required.</u> Conclusion: this additional information merely clarifies the data and analyses presented in the DEIR and does not change the analyses, conclusions, or determination of the severity of impacts of the Project relative to applicable General Plan goals and policies.(i.e., less than significant with project design and regulatory compliance).
H-7	The comment states..."Table 4.11-3 Master Plan Consistency Analysis indicates that the project has submitted a request for discretionary approval of a Master Plan to deviate from specific development standard requirements in the areas of Building Typology, Building Facades, Building Articulation, Build to Line and Frontage Area, Block Size/Building Configurations – High Rise, Block Size/Building Configuration - Mid Rise, Site and Block Configurations, Slip Lane/Street Frontage, Parking Standards – Manufacturing, Light- Large, and Bicycle Parking." See detailed analysis in Response H-8 below.
H-8	Table 4.11-3 provides an analysis column for each of the Master Plan provisions relative to the City's General Plan and Development Code. The comment does not make reference to that particular analysis so the commenter is encouraged to review those specific analyses of the Master Plan components for how they comply with the General Plan and Development Code.
H-9	It is important to note that state planning law and CEQA require a project to be generally consistent with General Plan goals and objectives but it need not be consistent with every goal or fully consistent with specific goals, as discussed in Response H-5 above (i.e., a project does not have to "rigidly conform" to the general plan). Projects over a certain size in Southern California necessarily exceed the SCAQMD's significance thresholds due strictly to their size and activity since the thresholds are daily emission limits for CO, NOx, VOCs, PM₁₀, and PM_{2.5}. The Project will mitigate its air quality and greenhouse gas emission impacts to the extent feasible, as documented in the DEIR and Final EIR. It should also be noted the City's most recent General Plan EIR concluded air quality and greenhouse gas emissions impacts would be significant and unavoidable and required a Statement of Overriding Considerations for approval. It should be noted that the DEIR already recommended seven mitigation measures for air quality and greenhouse gas impacts. In addition, as a result of comments by CARB and SCAQMD, a number of mitigation measures have been modified or added and are discussed in Responses F-4, F-5, and F-13 through F-18 in the letter from SCAQMD (Letter F) and as outlined in FEIR 3, Errata, and Table 5-1 in FEIR Section 5, Mitigation and Monitoring Program.

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	It should also be noted the Project is consistent with RCDC Section 17.22.020 as indicated in the DEIR (“Master Plan and City Development Code”) on DEIR page 3-34 in Section 3.5 of the Project Description. Benefits of the Project are discussed in Section 3.6, Project Design Features, which include views along Haven Avenue, solar energy/battery storage system for energy conservation, onsite CO₂ production to reduce truck trips in the surrounding area, and extensive landscaping. In addition, significant community benefits as outlined in the Findings for the EIR in its “Statement of Overriding Considerations” which include: • The project will maintain the City’s economic viability and productivity over the long term by encouraging efficient and sustainable use of the overall site a portion of which at present is vacant. • The project increases an employment generating use thereby increasing employment opportunities within Rancho Cucamonga. • The project provides for expanding and comprehensive siting an important employer and business to help sustain a strong local economy, with design qualities that contribute to its success. • The project will expand an industrial and manufacturing facility with ready access to Interstate 10, Interstate 15, and other major transportation arterial roadways, to support the production of consumer goods and the distribution of manufactured goods throughout the region. • The project provides for the development and maintenance of a citywide bicycle network of off-street bike paths, sidewalks, and on-street bike lanes, including along Haven Avenue, 6th Street, 7th Street, and Utica Avenue. • The project supports a connected, balanced, integrated, safe, and multi-modal transportation system that accommodates all travel options. • The project promotes the use of transit within the City as a means of reducing local traffic congestion, achieving greenhouse gases reduction targets, and connecting the community physically and socially. • The project includes energy efficiency and conservation systems and measures that reduce air pollution and greenhouse gas emissions. • The project will Implement a microgrid energy production system via cogeneration at an existing manufacturing site to minimize manufacturing waste and to reduce the demand on existing public services and systems while employing carbon-reducing technologies and reducing the facility’s potential climate impacts. • The project will increase the potential for beverage manufacturing as a revenue-generating land use for the City. Conclusion: this additional information merely clarifies the data and analyses presented in the DEIR and does not change the analyses, conclusions, or determination of the severity of impacts of the Project relative to applicable General Plan goals and policies.(i.e., less than significant with project design and regulatory compliance).

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H-10	CEQA requires that an EIR evaluate a project's potential significant effects on the physical environment. Social and economic effects, such as changes in the availability or affordability of housing, are not considered significant environmental impacts unless they would result in a reasonably foreseeable physical change to the environment (CEQA Guidelines § 15064(e)). Planning considerations related to affordable housing supply are addressed through the City's compliance with State housing law and are outside the scope of CEQA analysis unless tied to physical environmental effects. In this case, the comment has not suggested any physical environmental effects related to housing that would result from implementation of the Project.
H-11	CEQA requires that an EIR evaluate a project's potential significant effects on the physical environment. Planning considerations related to "no net loss" of housing capacity are addressed through the City's compliance with State housing law and are outside the scope of CEQA analysis unless tied to physical environmental effects. The Project does not propose any changes to a general plan land use designation, specific plan land use designation, or zoning to a less intensive use. The Rancho Cucamonga Municipal Code requires the implementation of a Master Plan for this Project due to the unique characteristics and large scale of the development. While the Master Plan will impose specified exceptions to zoning development standards, the underlying General Plan designation and zoning for the parcels will remain in place. The City's 2021-2029 Housing Element indicates there are two parcels within the Project that have some potential to provide housing (APN 209-411-002 with 1.6 acres and APN 211-409-02 with 4.39 acres. The first parcel is in the far northwest corner of the site in Phase 2 while the other parcel is the former vineyard site in Phase 1. The "Sites Inventory" (Table B-1) of the Housing Element (Appendix B) indicates these sites have the potential to support a total of 52 housing units based on allowable density. However, the table indicates the existing GP designation of the two sites is IP with a new land use designation of D 21st Century Employment District which indicates employment-generating uses are the primary goal of this new land use category. In any case, these are just potential housing sites and the City's Sites Inventory contains a potential for much more housing sites than are needed by the HE or the RHNA program over the life of the HE (8 years). Therefore, development of the Project site for non-residential uses would not have a significant effect on the Housing Element. For the reasons stated above, no construction of replacement housing has been proposed in conjunction with this Project. Even if state law did require identification of replacement housing sites for this Project in the EIR, CEQA does not require that an EIR engage in speculation or analyze impacts that are not reasonably foreseeable. If such construction were proposed in the future, the City would evaluate potential environmental impacts at that time in accordance with CEQA.
H-12	First, it should be noted the site already supports an existing industrial use (beverage warehouse). To the extent that construction of the Project impacts future development on parcels within 1,000 feet, CEQA does not require that an EIR engage in speculation or analyze impacts that are not reasonably foreseeable. Further, as set forth in Responses to H-10 and H-11 above, planning considerations related to the

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	availability of affordable housing will be addressed through the City’s compliance with State housing law. Any changes to the City’s Housing Element are outside the scope of the EIR for this Project.
H-13	Employment numbers verification (existing and projected). The applicant states the following as documented in DEIR Appendix K-4, Parking Assessment, and FEIR Appendix H: “We have 185 existing employees today at our Rancho Cucamonga Distribution facility. We expect to have all the same positions filled and staffed for those roles at opening. The bottling operation will add 289 employees to the total onsite. That quantity of personnel aligns to quantity we have at our Downey, CA and Los Angeles, CA facilities for similar operations. We are expecting that same quantity of roles to be active at opening.” Regarding employment projections, the stated General Plan goal of the ME-2 land use designation is to encourage a variety of employment opportunities in the City. The DEIR indicates the Project would add 289 new employees to the City’s employment base. This may be in excess of that estimated in the General Plan for Focus Area 3 but it is still well below the overall employment projections for light industrial land uses within the City, as indicated in Tables 4.14.1 and 4.14-2 in the DEIR (p. 4.14-2). The DEIR demonstrates the Project is generally consistent with the General Plan in terms of promoting employment-generating uses within the ME-2 category, so it is generally consistent with the growth goals of the General Plan. The City’s General Plan EIR examined potential cumulative impacts of growth in the City over the General Plan’s 20-year horizon timeline (through 2040) relative to SCAG’s regional growth plans (including “Connect SoCal”) and found impacts to be less than significant with planning and regulatory compliance. In addition, the development information available to the City at the time the cumulative projects list for the Fehr & Peers Traffic Impact Study (TIS) was prepared lacked information on number of employees that could result from each of the 174 projects (and only 60 of 174 projects were located within the City). Therefore, exact predictions or projections of employment growth from anticipated future development is not directly applicable to the additional employment anticipated from the proposed Project. For many years, the City was considered a “bedroom community” and is still considered “housing rich” in a regional sense. Therefore, the City considers the addition of employment-generating uses to be beneficial in the long-run relative to regional growth. This supplemental information supports the data, analysis, and conclusions already presented in the DEIR in Section 4.14, <i>Population, Housing, and Employment</i>. Therefore, the EIR does not need to be recirculated for additional public review and comment regarding this issue.
H-14	As the comment states, and as the project description repeatedly frames, the project isn’t a generic “high-cube fulfillment/sort facility”, it’s a beverage production, bottling, and distribution facility with distinct operations as clearly stated in the Project Description of the DEIR (see DEIR Chapter 3). The production shifts, onsite processes, and truck profiles differ considerably from ITE’s high-cube fulfillment/sort category.

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	The project traffic impact assessment (TIA) report, prepared by Fehr & Peers, explains in detail why ITE rates do not reflect this site's unique use/shift structure and that empirical driveway counts were taken from a similar facility in Downey and used to develop custom rates for the Project. Where the empirical driveway counts resulted in fewer trips than ITE rates, the analysis substituted the higher rates from ITE explicitly to be conservative. Recasting the whole Project as "high-cube fulfillment/sort" would be less accurate in estimating the Project's potential trip generation. The following excerpt from the TIA report summarizes the methodology used to derive Custom rates: TIA report – Project Trip Generation "Trip generation refers to the process of estimating the amount of vehicle traffic a project would add to the surrounding roadway system. Estimates for the proposed Project were created for the daily conditions and for the peak one-hour period during the morning (AM) and evening (PM) commute when traffic volumes on the adjacent streets are typically the highest. Due to the specific shift schedule of the proposed operation, trip generation estimates were included for midday as well. Due to the unique use, hours of operation, and employee shifts, traditional trip rates from Trip Generation Manual, 11th Edition (Institute of Transportation Engineers [ITE], 2021) were not reflective of trip generation behavior of the Project. As recommended by ITE, vehicle counts of the existing use were collected as empirical data to represent realistic trip generation behavior unique to the location. Table 3 presents the existing trips entering and exiting a similar-sized beverage plant site in Downey, collected over 24 hours on July 11, 2023. Custom rates presented in Table 4 were derived from volumes collected at these driveways and used in calculating future trip estimates for the proposed Project. It should be noted that midday volumes collected represent a triple shift operation of the existing facility which is anticipated to continue in the future operations. In addition, it should be noted that this report used ITE rates in certain instances where empirical data was far below the ITE rate for the onsite use. This results in a conservative analysis that utilizes both empirical data and ITE rates to provide realistic yet conservative assumptions regarding the trips generated by operations."
H-15	The Ganddini Group prepared the VMT assessment and states that the timing and timeline for implementing MM TRA-1 to continually achieve a VMT reduction below the City-established thresholds (i.e., every year, year-after-year) would need to be established once the specific measures are quantified in accordance with CAPCOA through implementation of a commute trip reduction program. As stated in MM TRA-1: The proposed project shall implement a commute trip reduction program consisting of transportation demand management (TDM) measures that achieve a minimum VMT reduction of 4.9 percent. The VMT reduction associated with the TDM measures to be implemented shall be quantified in accordance with the California Air Pollution Control Officers Association <i>Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity, Designed for Local Governments, Communities, and Project Developers</i> (December 2021)...The

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	project shall submit annual reports to the City to demonstrate ongoing compliance with this project VMT reduction goal. The actual measures to be used to achieve the 4.9% reduction will be spelled out in the commute trip reduction program to be developed by the applicant and reviewed and approved by the City. The 4.9% reduction represents a performance standard the project must meet which will be verified by calculations based on adopted CAPCOA methodologies. MM TRA-1 already states the project will submit annual reports to the City but total length of time over which the project will be required to demonstrate compliance with the performance standard will be at the discretion of the City (e.g., 10 years, 20 years, etc.). The comment that since future building tenants are unknown, implementation of trip reduction measures cannot be guaranteed. If this was a multi-tenant speculative industrial park project that may be true. However, this Project will have a single owner (Coca Cola) over the life of the project and is not expected to lease to add square footage that would be controlled by other businesses or entities. Therefore, achieving and maintaining a VMT reduction of 4.9% is not only doable but can be assured in the coming years as discussed in DEIR Section 4.17, Transportation, Impact TRANS-2 relative to VMT and Mitigation Measure TRA-1.
H-16	Traffic - geometric hazards. The applicant team indicates the project site is contained within the existing city roads surrounding the property. The access points created for the Project and shown on the site plan avoid sharp curves or dangerous intersections. The site was modeled using WB67 (72') sized trailers to eliminate any site access limitations. The owned fleet used for distribution utilizes a shorter tractor/ trailer combination size of 20'/48' or a total of 68'. The commenter states that "trucks exiting the site via the driveway on Utica Avenue require additional maneuvering space across the centerline of each street, meaning that the truck will need to drive on the "wrong side" of the street into oncoming traffic in order to leave the site." As previously explained, the site plan was laid out using a worst case assumption of trucks with an overall length of 72 feet. However, the applicant's truck fleet has a maximum length of 68 feet which will easily manage this exiting turn onto Utica Avenue without having to cross the centerline of the street (i.e., it will NOT need to drive on the wrong side of the street to exit the site). The commenter also states "the design and layout of the truck/trailer parking stalls cannot accommodate truck/trailer maneuvering as the truck depicted here requires the area of the adjacent parking stall in order to enter/exit its own parking stall. The design and layout of this area is also inadequate to accommodate truck/trailer maneuvering as the truck is depicted to turn onto a hatched nonvehicular area." As stated above, the site plan was laid out using a worst case assumption of trucks with an overall length of 72 feet. However, the applicant's truck fleet has a maximum length of 68 feet which will easily manage maneuvering into its parking stalls without crossing into hatched non-vehicular areas. These limitations were reviewed and approved by the Fire Department in their development plan review of the proposed Project. This supplemental information supports the data, analysis, and conclusions already presented in the DEIR in Section 4.17, <i>Transportation</i>, regarding geometric hazards.

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	Therefore, the EIR does not need to be recirculated for additional public review and comment regarding this issue.
H-17	Traffic - truck/trailer maneuvering. The applicant team indicates similar information to that in Response H-16 above. The site layout pattern was based on a WB67 truck-trailer (72'). The owned fleet used for distribution utilizes a shorter tractor/ trailer size of 20'/48' or a total of 68'. This will provide adequate onsite maneuverability as outlined in the most current site plans.
H-18	Traffic - emergency access. The applicant team indicates the project site contains additional emergency access points that were added to the project in response to comments from the City Fire Department as a part of the Fire Department's Master Plan review. Project site emergency access is therefore in compliance with City regulatory requirements. A review of the initial site plan submitted for the Project and the current site plan indicate a number of emergency access points were added in this regard (see DEIR Exhibit 4.17.4, Emergency Access Plan).
H-19	The EIR did select a reasonable range of alternatives given the General Plan land use designation and zoning classification of the site, as well as the identified significant impacts of the proposed Project (air quality and greenhouse gas emissions). The three development-related alternatives selected by the City for further study were: Alternative 1 - Expand Existing Facility (approx. 40% less intense than the Project); Alternative 2 – Reduced Intensity (approx. 30% less intense than the Project); and Alternative 3 - Mixed Use (Commercial/Office/Residential). In addition to the No Project – No Development Alternative, two of the alternatives are less intense but similar development to the proposed Project which is in keeping with selecting alternatives that could reduce or eliminate the significant impacts of the Project but also meet all or at least to some degree the objectives of the Project. The introductory sections go into detail about the possible range of alternatives that could have been studied (Section 5.2, Alternatives Considered But Rejected). The General Plan designation for the site could allow a wide range of potential residential and non-residential land uses. However, many of these would be mixed use projects based on the General Plan land use designation for the site which does allow certain residential and other non-residential uses. Alternative 3 was selected as a representative type of mixed use project that was reasonable in terms of development intensity. However, almost any non-residential development other than warehousing would generate more traffic and thus more mobile source air pollutants and greenhouse gas emissions. City staff considered various mixes of these land uses based on various constraints and impacts. For example, a substantial amount of commercial use could generate substantial amounts of traffic. In addition, a substantial amount of residential units on the Project site would not be compatible with non-residential uses surrounding the project site. In the end, the City selected these alternatives as the most reasonable range of alternatives that could reduce or eliminate one or more of the Project's significant impacts. Due to the size of the site, no reasonable development-related project was found that could eliminate one or both significant and unavoidable impacts of the project except for possibly high cube warehousing which generates lower peak hour traffic but which is not a compatible use with surrounding existing land uses: a high cube warehouse does not adequately meet Project objectives.

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	Finally, six of the seven goals of the Project involve expanding and maximizing beverage manufacturing on this site taking advantage of its regional location, so evaluating a variety of non-manufacturing alternatives would be counter to almost all of the Project objectives.
H-20	Section 6.2 of the EIR, Growth-Inducing Effects, already states...“the Project’s development would spur significant economic growth in terms of employment” but since it is a non-residential project it would not result in significant growth in housing or population (DEIR page 6-2, 1st two paragraphs)”. CEQA does not require mitigation or overriding consideration of growth-inducing impacts. Per Section 15126.2(d) of the State CEQA Guidelines, the EIR is only required to acknowledge such impacts, the CEQA Guidelines do not require an analysis of potential population-inducing effects against the General Plan. The comment also conflates growth-inducing impacts with the separate analysis of cumulative impacts. The EIR does analyze potential cumulative impacts of the Project as summarized in Section 6.1 related to CEQA-mandated sections. However, the actual potential cumulative impacts of the Project and anticipated growth are evaluated for each environmental issue and examined in Sections 4.1 through 4.20 of the EIR. The cumulative analysis does identify the horizon year of the current City General Plan (2025 to 2045) and the traffic section (4.17) indicates its horizon year is 2040 based on the SCAG regional model. The Hydrology Section (4.10) states the analysis of the Water Supply Assessment (WSA) focuses on regional availability of water over the 20-year horizon of the WSA to be consistent with the Urban Water Management Plan for the Cucamonga Valley Water District (2020-2040) based on state law. The Project is consistent with the General Plan land use designation so the growth represented by the Project does not exceed that identified in the General Plan EIR and described in the Project EIR.
H-21	The comment is correct that the Project represents significant employment growth as discussed in Response H-20 above. The comment is also correct when it states the EIR calculates the Project would add 289 net new jobs, but it is misleading to only rely on a percentage increase in GP Focus Area 3 to characterize this as significant in an adverse way. Rancho Cucamonga has historically been a “housing rich” community so adding new jobs/employment is considered a benefit to the community. The most important measure is that this Project represents 5.6% of all the projected employment growth over the next 20 years. It represents an expansion of an established well known employer in the City and this amount of employment growth is within the SCAG projections in the Connect SoCal regional plan. As stated in Response H-20 above, CEQA does not require mitigation or overriding consideration of growth-inducing impacts. CEQA only requires acknowledgement of such impacts. this is to make the decision-makers aware of the implications of project approval. Conclusion: There has been no empirical data presented that would indicate the EIR must be revised and recirculated for additional public comment. The comment does not raise a new significant impact or indicate a substantial increase in a significant impact. This additional information merely clarifies the data and analyses already presented in the DEIR and does not change the analyses, conclusions, or determination of the severity of impacts of the Project relative to anticipated growth (i.e., less than significant with project design and regulatory compliance).

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H-22	What is clear is the Project will result in a net increase in local employment by 287 workers but it is overly speculative to attempt to determine from where those additional employees would come. However, it is reasonable to assume they would come from either the unemployed within the City or in surrounding communities as the anticipated payment for such work would likely not entice workers from long distances to have to relocate for manufacturing jobs. It is much more likely that workers would commute to the new blue collar positions from within the City or surrounding areas. SCAG assumes that over the long-term, assuring that local VMT figures do not exceed regional figures will help balance out trip generating and trip attracting uses on a regional basis which will slowly reduce the number and length of all trips throughout the region, thereby minimizing their related air quality and other environmental impacts. Indeed recently listed 2,428 warehouse jobs available in Rancho Cucamonga https://www.indeed.com/q-warehouse-l-rancho-cucamonga,-ca-jobs.html?vjk=9ead3dce467c2100 It would also be overly speculative to attempt to calculate whether or what percentage of the City's unemployed workforce is qualified for or interested in work in the industrial sector. However, the City does contain numerous warehouses which hire workers from the industrial sector so it is reasonable to assume this project would be able to find relatively local workers to fill its new blue collar positions. Warehousing employment is readily available in and around Rancho Cucamonga, with numerous companies seeking warehouse associates, selectors, and other roles, often found through job boards like Indeed, SimplyHired, Amazon Jobs, and ZipRecruiter. Utilizing staffing agencies can expedite the job search process by providing access to a wider range of unadvertised positions and connections with employers. For example, the website Indeed recently listed 2,428 warehouse jobs available in Rancho Cucamonga: https://www.indeed.com/q-warehouse-l-rancho-cucamonga,-ca-jobs.html?vjk=9ead3dce467c2100
H-23	The responses above to the various comments by CSEJA indicate that the described information should be added to the DEIR and included in FEIR Chapter 3, Errata. However, no substantiated evidence has been presented that would demonstrate the Project results in a new or substantially increased environmental impact requiring revision and recirculation of the Project EIR for additional public review. In addition, the CSEJA is already on the City's CEQA notification list and would be notified of any future meetings or documents since they have already commented on the Draft EIR. The correspondence will be sent to the address indicated in the comment.
H-24	The commenter provides introductory remarks that accurately summarize the Project in a general manner and states the DEIR may not have properly evaluated the Project's air quality, health risk, and GHG impacts. As described in more detail in responses to comments H-25 to H-30, the EIR, as revised (see FEIR Chapter 3, Errata) has adequately evaluated all potential air quality, health risk, and GHG impacts of the proposed Project.
H-25	The commenter accurately summarizes the DEIR's findings regarding operational NO_x emissions but notes the DEIR's finding that this impact would be significant and unavoidable may be unsubstantiated and that additional feasible mitigation measures

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	should be considered. Refer to response to comment H-29 for information on the City's review of the commenter's suggested NO_x mitigation measures. In addition, as a result of comments by CARB and SCAQMD, a number of mitigation measures have been modified or added and are discussed in Responses F-4, F-5, and F-13 through F-18 in the letter from SCAQMD (Letter F) and as outlined in FEIR 3, Errata, and Table 5-1 in FEIR Section 5, Mitigation and Monitoring Program. Note that a number of measures recommended by CARB and/or SCAQMD have been added while others were determined to be infeasible for this Project.
H-26	The commenter states the proposed Project may contribute to disproportionate health risk impacts and presents general information on the health risk impacts of warehouses on surrounding communities; however, as described in more detail below, the commenter has not provided new information that substantially changes the Project setting or the EIR's evaluation of the Project's potential adverse health risk impacts. • The commenter summarizes SCAQMD and other information that finds Black and Latino communities are disproportionately affected by NO_x and diesel PM emissions from warehouses, and that these emissions may cause adverse health impacts. The City notes that the DEIR clearly describes the potential health effects of NO_x (p. 4.3-2) and diesel PM (4.3.3), as well as the prevalence of these pollutants in the South Coast Air Basin (pp. 4.3-4, 4.3-10). The DEIR also clearly discloses that sensitive air quality receptors in the vicinity of the Project site are exposed to air pollution from light industrial / warehousing activities, vehicle traffic, and other sources of pollutants (p. 4.3-11). The DEIR also discloses and includes CalEnviroScreen information on the Project site's census tract (#6071002110), including sensitive population and socioeconomic factors that rank the census tract near the middle of the state for characteristics such as health status, age, and income. Thus, the DEIR already includes information that is commensurate with that provided by the commenter, and no change to the DEIR is warranted at this time. • The commenter presents information that the Project site is located in a Senate Bill (SB) 535 designated disadvantaged community and, therefore, would contribute to the disproportionate impact warehouses poses to the health of nearby residents. The City notes the commenter is partially correct that the Project site is located in a SB 535 disadvantaged community. The information presented by the commenter reflects the census tract's scoring under the previous 2017 version of CalEnviroScreen (Version 3.0). In order to maintain funding and program consistency, SB 535 continues to designate areas that were in the top 25th percentile under CalEnviroScreen Version 3.0, but that are no longer in the top 25th percentile under CalEnviroScreen Version 4.0, as disadvantaged communities. CalEnviroScreen Version 4.0 was updated with improvements to data and methodology, and is considered an accurate reflection of the most recent pollution exposures and population vulnerabilities that communities face. As shown in the DEIR (pp. 4.3-13 and 4.13-4), under CalEnviroScreen Version 4.0, the Project site is not located in a census tract in the top 25th percentile for statewide pollution burden. The City notes it has revised the EIR (see FEIR Chapter 3, Errata) to indicate the Project census tract was previously in the top 25th percentile for statewide

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	pollution burden and was therefore designated a disadvantaged community pursuant to previous versions of CalEnviroScreen; however, this fact alone does not signify that the Project would contribute to disproportionate impacts on public health. As noted in the DEIR, the closest sensitive receptor is a preschool facility – a receptor that would not be continuously exposed to Project emissions – is located approximately 370 feet east of the Project site, while the nearest residential receptor that could be continuously exposed to Project emissions are more than 1,400 feet east of the Project site. Additionally, the EIR, as revised (see FEIR Chapter 3), presents the results of detailed HRA that quantifies the proposed Projects total combined adverse health risks and demonstrates Project risk levels would not exceed SCAQMD thresholds. Importantly, the City notes the EIR's HRA was conducted in accordance with SCAQMD practices and procedures, and the EIR's significance finding is based on the total combined risk from the continuous exposure to all Project pollutant sources – construction, mobile operations, and stationary source operations – which is considered a health-protective assessment because SCAQMD guidance permits lead agencies to evaluate construction and operational health risks independently, and does not currently require a lead agency to evaluate combined construction and operational risks. Finally, the EIR, as revised, includes the results of updated LST modeling that shows the construction and operation of the proposed Project would not result in emissions that exceed applicable ambient air quality standards. Thus, even though the Project is located in a census tract with a relatively high pollution burden, Project-specific factors and analyses contained in the EIR factually demonstrate the proposed Project would not result in significant adverse health risks and would not exacerbate existing pollution levels. • The commenter presents information that children are more susceptible to pollution and its effects and argues that the health risks from warehouses to children need to be evaluated, specifically for children at the daycare/preschool. The City agrees, and notes that the HRA prepared for the Project includes health-protective assumptions for child receptors, including use of age sensitivity factors for 3rd trimester and early child (0 – 2 years and 2 – 9 years) life stages, an assumed 12-hour daily exposure duration for pre-school children (DEIR p. 4.3-48), and use of 95th percentile breathing rates (DEIR p. 4.3-49). Furthermore, as noted in the DEIR (p. 4.3-68) and response to comment F-8, the HRA prepared for the Project conservatively assumes the modeled MEIR is an infant for the first two years of exposure – when model diesel PM concentrations are highest and the most protective age sensitive factor is applied – and then develops into later life stages when modeled diesel PM concentrations and protective age sensitivity factors are lower. Additionally, DEIR Appendix C3.3 has been revised to include additional analysis for infant receptors by adding carcinogenic risk estimates that assume exposure to diesel PM begins for an individual in year 1, 2, 3, 4, and/or 5. As shown in revised Appendix C3.3, carcinogenic risk estimates remain highest when it is assumed early life stage exposure occurs in years 1 and 2 of the Project, as was done in the DEIR. For these reasons, the EIR has adequately evaluated the Project's potential health risks to children.

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	The commenter notes the DEIR identifies a day care/preschool is located near the Project site and that the Project may pose a significant risk to this facility. As explained above, the HRA prepared for the Project includes health-protective assumptions for child receptors, including the identified daycare/preschool, and adequately evaluated the Project's potential health risks to children.
H-27	The comment requests the EIR analyze effects on nearby sensitive receptors which are more likely to include disadvantaged communities. The potential health risks/impacts to children at the nearby daycare center as well as other sensitive receptors were addressed in detail in the health risk assessment discussion of the EIR (Section 4.3, Air Quality). In addition, this issue is discussed in Response H-26 above. Impacts were found to be below the OEHHA and SCAQMD thresholds for significant cancer and non-cancer risks. The commenter expresses their opinion that the EIR should be revised to assess the Project's contribution to cumulative air quality impacts and include the preparation of a cumulative health risk assessment. Comment noted. The City directs the commenter to response to comment F-11 for information on the EIR's revised cumulative impact analysis.
H-28	The commenter provides a summary of the EIR's GHG findings, states that under CEQA the DEIR must implement all feasible mitigation measures, and argues that additional feasible mitigation measures are available. Refer to response to comment H-30 for information on the City's review of the commenter's suggested GHG mitigation measures.
H-29	The commenter suggests the City consider the following mitigation measures to reduce the Project's NO_x emissions: The commenter notes that the SCAG 2020 Regional Transportation Plan/Sustainable Communities Strategy Program Environmental Impact Report recommends several construction "Air Quality Project Level Mitigation Measures" that are applicable to the Project, including minimizing unnecessary vehicular and machinery activities, requiring contractors to assemble a comprehensive inventory list, and using SCAQMD incentive funds to purchase commercially available, low emission heavy-duty engines. As a point of clarification, the referenced EIR evaluates a long-range comprehensive plan for multi-modal transportation needs given existing and Projected land use patterns and job growth in the SCAG region. The measures recommended in this EIR do not directly apply to the City or the proposed Project. Nonetheless, the City has reviewed the referenced EIR and the commenter's specific suggestions and determined that the DEIR already includes measures that are commensurate with these suggestions. For example, DEIR Mitigation Measure AIR-2B already requires all equipment greater than 50 horsepower used during construction meet Tier IV Final emissions standards and limits idling of construction equipment and trucks to no more than two minutes unless specifications require idling to occur. Thus, these suggested measures would not do more to reduce potential Project NO_x emissions during construction than the mitigation measures already included in the DEIR.

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	• The commenter presents several CARB recommendations for reducing NO_x emissions; however, these recommendations were submitted by CARB as part of its comments on the Notice of Preparation for a Specific Plan in Calimesa, Riverside County, and the commenter provides no context or justification for why CARB comments on a different type of Project in a different county are relevant to the proposed Project in the City of Rancho Cucamonga. Furthermore, CARB did not submit the same recommendations as part of its comments on the DEIR (see Comment Letter B). Nonetheless, the City has reviewed the suggested mitigation measures and determined the DEIR already includes measures that are commensurate with the commenter's generic recommendations. For example, Mitigation Measure AIR-2B requires the applicant to connect to existing electrical service to power construction railers, stationary equipment, and portable equipment, which promotes clean construction practices and ZE equipment. Mitigation Measure AIR-2B also requires all equipment greater than 50 horsepower used during construction meet Tier IV Final emissions standards and limits idling of construction equipment and trucks to no more than two minutes unless specifications require idling to occur. With regard to 2014 model year (MY) trucks, the City does not consider it feasible to require the applicant to require all heavy-duty trucks accessing the site during construction be MY 2014 or newer because the regulation of mobile source emissions is the responsibility of the U.S. EPA and CARB, and neither the City nor the applicant can control the specific model year of an individual truck, or truck fleet, that will access the site in the future. The City notes that, as of January 1, 2023, CARB's Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen, and Other Criteria Pollutants from In-Use Heavy Duty Diesel Fueled Vehicles (a.k.a. the Truck and Bus Regulation), already requires nearly all diesel-powered vehicles operating in California that have a gross vehicle weight rating over 14,000 pounds to have a 2010 or newer engine and emission system. Furthermore, while MY 2014 trucks are, in general, subject to more stringent fuel efficiency and GHG emission standards that provide indirect NO_x emissions, the California Code of Regulations establishes the same NO_x emission standard, in terms of grams per brake horsepower-hour, for MY 2008 – 2023 trucks. Only manufacturers that have voluntarily agreed to meet CARB's optional (i.e., not required by regulation) NO_x emission standards would result in an actual emission reduction; however, according to CARB, as of October 2023, there were no MY 2014 trucks certified to CARB's optional low NO_x standards. Thus, the recommendation to require only 2014 MY trucks is not only outside the enforceability of the City, but would also be unlikely to result in meaningful NO_x emissions reductions. Finally, the City notes that the installation of vegetative walls and barriers between loading docks and nearby residents and workers does not reduce emissions and is therefore not effective mitigation that requires further consideration. • The commenter references California Department of Justice recommendations to keep maintenance records and data sheets, conducting site inspections, and providing on-site meal options to monitor and reduce emissions. The City notes that keeping records and logs is not an action that directly reduces emissions and, therefore, is not an effective mitigation

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	measure that requires further consideration. With regards to on-site meal options during construction, the City considers it infeasible at this time to require such a measure because it cannot be guaranteed that this service could be provided in accordance with health and safety regulations that govern construction workers and work sites. Furthermore, the City has reviewed the emissions modeling presented in the DEIR and determined that worker vehicle trip emissions contribute less than 0.25% of the maximum daily construction NOX emissions identified in the DEIR. Thus, the development of mitigation for this activity is not proportional to its contribution to the identified significant impact. • The commenter generally refers to SCAQMD recommendations for zero emission (ZE) and near-zero emissions (NZE) trucks. As described above and in response to comment B-8 and F-13, the EIR, as revised (see Chapter 3), includes measures that will require the Project to use eight ZE or NZE trucks within one year after receiving a certificate of occupancy and support the implementation of ZE or NZE technologies. It would, for instance, install ZE charging infrastructure that allows for the immediate use of limited ZE trucks and supports the expansion of this technology over time. The City has considered the commenters recommendations and determined they are generally too uncertain to constitute effective mitigation measures.
H-30	The commenter suggests the City consider the following mitigation measures to reduce the Project's GHG emissions: • The commenter refers again to “applicable” mitigation measures from the SCAG 2020 Regional Transportation Plan/Sustainable Communities Strategy Program Environmental Impact Report, including improving transit access, implementing commute trip reduction marketing, adopting employer trip reduction strategies, and requiring non-diesel backup generators, and staff training. As noted in response to comment H-29, the referenced EIR does not directly apply to the City or the proposed Project, and the commenter does not provide any specific contest or justifications for why these measures are relevant to the Project. Nonetheless, the City has reviewed the referenced EIR and the commenter's specific suggestion and determined that the DEIR already includes design features and mitigation measures that are commensurate with these suggestions. For example, the DEIR (p. 4.6-32) describes that the Project includes design features that enhance non-vehicular access, such as the reconstruction of a bust stop on Haven Avenue, and DEIR Mitigation Measure AIR-2D requires the implementation of travel demand management measures. Thus, these suggested measures would not do more to reduce potential Project GHG emissions than the design features and mitigation measures already included in the DEIR. With regard to requiring non-diesel backup generators, the results of the revised HRA prepared for the Project (see FEIR Chapter 3) indicate the proposed Project would not result in significant adverse health risks from diesel PM and other toxic air contaminants. Therefore, mitigation measures are not necessary to reduce or avoid a significant impact. Finally, the commenter's reference to “staff training” is not specific enough and cannot be responded to at this time.

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	• The commenter references California Department of Justice recommendations to require backup generators be powered by non-diesel fuel, require tenants to train staff on diesel vehicle record keeping, and to require tenants to enroll in the U.S. EPA’s SmartWay program. As described above, the use of non-diesel generators is not necessary for the Project because this measure would not reduce or avoid an identified significant impact. With regard the training staff on diesel vehicle recordkeeping, the City notes staff training would not reduce emissions and is therefore not an effective mitigation measure that should be added to the EIR. Finally, with regard to requiring tenants to enroll in the SmartWay program, the City notes the applicant would be both the owner and the operator of the proposed Project. According to the U.S. EPA (2025), “SmartWay is a market-driven initiative that empowers businesses to move freight in the cleanest, most energy-efficient way possible. It provides shippers and carriers with the tools and support they need to track, document, and share information about transport modes, equipment, and operational strategies that can reduce fuel use and emissions across the supply chain.” As described in response to comment B-8, the DEIR already incorporates measures to reduce emissions from heavy duty truck trips, and the commenter does not provide any specific rationale or evidence that requiring the applicant to participate in the SmartWay program would result in additional GHG emissions reductions. • The commenter states the CEQA guidelines permit offsite measures to mitigate a project’s emissions and recommends the City consider local carbon offset programs to reduce the Project’s GHG emissions impacts. The City has considered this comment and determined the use of offsite measures to reduce the Project’s GHG emissions levels is not feasible for several reasons. First, the commenter does not identify a specific offset program or local offset project for the City to consider. Second, mandating carbon offsets as mitigation has been found to not meet the CEQA standards for mitigation because such offsets must be, among other requirements, “real, additional, quantifiable, permanent, verifiable, and enforceable.” (<i>Golden Door Properties, LLC v. County of San Diego</i> (2018) 27 Cal.App.5th 892.) To be adequate mitigation, any local offsite project or purchased offsets must be from a registry with a CARB-approved protocol. There are only a limited number of registries with CARB-approved protocols, and access to those registries is primarily reserved for participants in California’s Cap-and-Trade Program. Also, there is no guarantee that sufficient offset credits would be available. Therefore, the availability of sufficient, reliable offsets is outside the control of the City and Project applicant. Further, credits purchased from registries may not meet CEQA’s mitigation measure requirements because the emission reductions achieved from such credits may not be additional to existing requirements on a project and because the City may not be able to adequately ensure the stated emission reductions will not be reversed. Finally, mobile sources are key contributor to the Project’s GHG emissions. However, as discussed in the DEIR, although the DEIR calculated Project emissions based on current technologies, mobile source emissions are not necessarily stagnant over time and technological and/or regulatory advances are likely to reduce mobile source emissions. Thus, the purchase of offsets as a means to

ID	Response to Comment Letter H – BC&H LLC (GSEJA) + SWAPE
	mitigate future mobile source emissions (which were quantified for CEQA purposes but likely to be substantially reduced in the future) does not allow correlation of the mitigation measure to the future impact.

References added by inclusion in Responses to Comments in Letter H

CARB, 2023. List of Optional Low NOX Certified Heavy-Duty Engines. October 2023. <
<https://ww2.arb.ca.gov/sites/default/files/2023-10/List%20of%20Optional%20Low%20NOx%20Certified%20Heavy-1023-ADA-10032023.pdf>

U.S. EPA 2025. Smartway Program Highlights for 2024. December 2024. <
<https://www.epa.gov/system/files/documents/2024-12/420f24041.pdf> >

COMMENT LETTER I – ADVOCATES FOR THE ENVIRONMENT

LETTER I

June 12, 2025

Advocates for the Environment

A non-profit public-interest law firm
and environmental advocacy organization



Sean McPherson, Principal Planner
Rancho Cucamonga Planning Department
10500 Civic Center Drive
Rancho Cucamonga, CA 91730

Via U.S. Mail and email to Sean.McPherson@cityofrc.us

Re: Comments on Draft Environmental Impact Report for El Camino Project, SCH No.
2023080369

Dear Mr. McPherson:

Advocates for the Environment submits the comments in this letter regarding the Draft Environmental Impact Report (DEIR) for the El Camino project (**Project**). The Project Site is located in the southern area of the City of Rancho Cucamonga (**City**), in southwestern San Bernardino County. The Project proposes to develop the 30.1-acre Project Site by constructing up to 1,054,541 square-feet of new manufacturing, light industrial, and office spaces across two construction phases. We have reviewed the DEIR and submit comments regarding the sufficiency of the DEIR's Greenhouse-Gas (GHG) analysis under the California Environmental Quality Act (CEQA).

I1

The City Should Require the Project to be Net-Zero

Given the current regulatory context and technological advancements, a net-zero significance threshold is feasible and extensively supportable. GHG emissions from buildings, including indirect emissions from offsite generation of electricity, direct emissions produced onsite, and from construction with cement and steel, amounted to 21% of global GHG emissions in 2019. (IPCC Sixth Assessment Report, Climate Change 2022, WGIII, Mitigation of Climate Change, p. 9-4.) This is a considerable portion of global GHG emissions. It is much more affordable to construct new building projects to be net-zero than to obtain the same level of GHG reductions by expensively retrofitting older buildings to comply with climate change regulations. Climate damages will keep increasing until we reach net zero GHG emissions, and there is a California state policy requiring the state to be net-zero by 2045. It therefore is economically unsound to construct new buildings that are not net-zero.

I2

Environmental groups have achieved incredible outcomes by litigation under CEQA. Two of the largest mixed-use development projects in the history of California, Newhall Ranch (now FivePoint Valencia), and Centennial (part of Tejon Ranch) decided to move forward as net-zero communities after losing CEQA lawsuits to environmental groups. The ability for these large projects

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to become net-zero indicates that it is achievable, even for large-scale developments. The Applicant for this Project should do the same.

We urge the City to adopt net-zero as the GHG significance threshold for this project. This threshold is well-supported by plans for the reduction of GHG emissions in California, and particularly the CARB Climate Change Scoping Plans. The CARB 2017 Scoping Plan states that “achieving no net additional increase in GHG emissions, resulting in no contribution to GHG impacts, is an appropriate overall objective for new development.” (CARB 2017 Scoping Plan, p. 101.) Additionally, the CARB 2022 Scoping Plan reaffirms the necessity of a net zero target by expressing: “it is clear that California must transition away from fossil fuels to zero-emission technologies with all possible speed ... in order to meet our GHG and air quality targets.” (CARB 2022 Scoping Plan, p. 184.) CARB further encourages a net-zero threshold in its strategies for local actions in Appendix D to the 2022 Scoping Plan. (CARB 2022 Scoping Plan, Appendix D p. 24-26.)

I2

Moving this Project forward as a net-zero project would not only be the right thing for the City to do, but also would help protect the City and the Applicant from CEQA GHG litigation.

The DEIR’s GHG Analysis Violates CEQA

Combining the two Project phases, the total yearly project emissions could be up to 73,720.5 MTCO₂e.¹ The City adopted a dual threshold based on CEQA Guidelines Appendix G. Under the first threshold, the City determined that the Project would have a significant and unavoidable impact under the South Coast Air Quality Management District’s (SCAQMD) numerical GHG threshold of 10,000 MTCO₂e per year for industrial projects. (DEIR, p. 4.8-22.) Yet, as to the second threshold, the City erroneously determined that the Project would have a less-than-significant GHG impact because it claimed that the Project would not conflict with applicable plans, policies, and regulations for the reduction of GHGs. The Project would have a significant impact under the second threshold because it conflicts with applicable plans, policies, and regulations. Still, significance under any of the chosen thresholds requires a finding that the Project’s cumulative contribution to GHG impact would be significant, because GHG impact is inherently cumulative.

I3

The City offered Mitigation Measures GHG-1, which would reduce GHG emissions from appliance energy consumption; and GHG-2, which would reduce GHG emissions from building energy consumption. Additionally, Mitigation Measures AIR-3 through AIR-5 were cross-referenced from the Air Quality section of the DEIR because of their potential co-benefits of reducing carbon emissions. (DEIR, p. 4.8-31.)

I4

¹ Representing both phases, without thermal recovery. $29,821.6 \text{ MTCO}_2\text{e} + 43,898.9 \text{ MTCO}_2\text{e} = 73,720.5 \text{ MTCO}_2\text{e}$. The unmitigated project-related emissions for the first phase are 29,821.6 metric tons of carbon dioxide equivalent (MTCO₂e) per year (DEIR, p. 4.8-28.) The annual unmitigated emissions from the second phase are expected to be 43,898.9 MTCO₂e without thermal recovery, or 41,126.0 MTCO₂e with thermal recovery. (DEIR, p. 4.8-28.)

Even after mitigation, the total emissions calculated still greatly exceeds the threshold. The two proposed GHG mitigation measures would only reduce the Project's GHG emissions by about 150 MTCO₂e per year, representing about 2% of the Project's annual emissions. (DEIR, p. 4.8-31.) The City also references air quality mitigation measures for reducing vehicle emissions, but this still only would reduce less than 100 MTCO₂e, representing a mere 0.4% of mobile source emissions reductions. The City determined that the Project's GHG impact would be significant and unavoidable.

14

The EIR did not provide substantial evidence that the mitigation measures included in the DEIR represented the only feasible mitigation measures for reducing the significant GHG impact. There are other feasible mitigation measures that the City should have considered and adopted to reduce the significant GHG impact identified in the DEIR to the extent required by CEQA.

Some Mitigation Measures are Vague and Improperly Deferred

Vague and unenforceable mitigation measures violate CEQA (*California Clean Energy Comm. v. City of Woodland* (2014) 225 Cal. App. 4th 173, 180.) There is no showing that certain mitigation measures would be enforceable, which constitutes improper deferral. In particular, the mitigation measures describe elements of plans to be later prepared and adopted in the future, rather than explicating specific, measurable mitigation standards.

For example, AIR-4, which requires the Project to include the preparation of a future campaign to reduce vehicle miles travelled (VMT) and transportation demand management (TDM), fails to create an enforceable plan for mitigation. AIR-4 does not require any concrete performance standards, rather it relies on the speculative and deferred action. CEQA requires that all mitigation measures are "capable of being accomplished in a successful manner within a reasonable period of time," which does not comply with this measure's speculative nature. The DEIR itself should have been the instrument through which the City identifies the specifications and details required to achieve reductions. The City's failure to specify exact performance standards for the VMT reduction plan and TDM plan that will be developed in the future constitutes an improper deferral of those mitigation strategies, a violation of CEQA.

15

Overall, the City violated CEQA's requirement for specific and enforceable mitigation measures because some of the identified mitigation measures fail to commit to any particular standards, and components of some measures lack sufficient performance criteria.

Infeasibility Finding Lacks Substantial Evidence

The conclusion that the Project will not be able to achieve any mitigation beyond which was identified in the proposed mitigation measures is not supported with substantial evidence. The DEIR should have proposed these features to be applied to the maximum-feasible extent in order to justify

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the conclusion that the Project's GHG impact would be unavoidable due to lack of feasibility of further mitigation.

It Is Feasible to Alter Proposed Mitigation Measures to Increase Mitigation

The mitigation measures identified to reduce the Project's significant GHG impact were not implemented to the maximum feasible extent. Including heightened standards in the proposed mitigation would ensure accountability in achieving the maximum mitigation, which CEQA requires for significant impact.

For example, Mitigation Measure GHG-1, Reduce Appliance Energy Consumption and GHG Emissions, can be bolstered by requiring all appliances to be Energy Star certified, not just those intended for employee use. Additionally, the current appliance categories are unnecessarily limited in scope, and it is feasible to include other type of appliances, such as water heaters, lighting, etc.

The Project location is a nonresidential building zoned within a Mixed Employment 2 Zone, so CAP Strategy 3.2, "Zero Net Electricity" (ZNE), is applicable. (DEIR p. 4.8-39.) However, the City asserts that this strategy does not apply to the Project because there has not been an official ordinance requiring ZNE. While this may be true, CEQA requires all feasible mitigation measures be implemented for significant GHG impact, regardless of whether there is a formal regulation. With this context, Mitigation Measure GHG-2 is insufficient because it is underinclusive, only requiring a 5% improvement over the standard building design when it is feasible to reach ZNE. The DEIR does not provide explanation other than the lack of ordinance for why they are not implementing a plan to reach ZNE, falling short of CEQA demands. (Cal. Code Regs. tit. 14, §15126.4(a)(1)(B)).

Additionally, the air quality mitigation measures can be modified to incorporate more impactful and enforceable standards to reduce GHG emissions. Measure AIR-2C presents a plan to reduce light-duty vehicle trip emissions that merely outlines their plan to designated parking for clean air vehicles, relying on employee lifestyle changes and their personal decision to use clean air vehicles. Similarly, AIR-2E lacks tangible and enforceable benchmarks, relying on individual usage and compliance with basic infrastructure "readiness requirements," not mandatory performance. While in theory this will encourage public participation and support, in practice there are no methods in place to ensure accountability. The Project should require the use of Near-Zero Emission and Zero Emission Vehicles for the Project's commercial and operational uses, not just "promote" their use. (DEIR, p. 2-24.)

While the identified mitigation measures are a good start, the City did not demonstrate that these actions would represent the maximum feasible mitigation to support a finding that the Project's impact would be significant and unavoidable.

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It Is Feasible to Adopt Further Mitigation Measures

CEQA requires that the lead agency identifies specific reasons for infeasibility of further mitigation when concluding significant and unavoidable impact. The City did not attempt to specify any infeasible mitigation measures when concluding that the Project's GHG impact would be unavoidable, nor did it provide any reasoning that the identified mitigation measures represent the maximum feasible mitigation.

I10

For example, the City has listed the same mitigation measure, AIR-2D, in three categories—Air Quality, Greenhouse Gases, and Transportation. While this measure may indeed contribute to total emissions, vehicle emissions are an amalgamation of various contents, thus requiring a more nuanced analysis. Specifically, GHG analysis requires further inquiry into the type, fuel efficiency or type of vehicle, and trip length for each vehicle, whereas traffic is only focused on the VMT itself. The VMT metrics alone are not sufficient for GHG emission analysis, and it is both reasonable and feasible to incorporate the additional data methodologies. This will allow a more targeted approach to address mobile source emissions.

I11

It is also important to note that the City includes two potential Phase 2 plans, one with thermal recovery and one without. The very fact they included thermal recovery as an option reflects its feasibility. The City does not provide an explanation for its infeasibility. Therefore, the City should include thermal recovery for Phase 2, as it would reduce emissions by approximately 6%.² By listing thermal recovery as a potential project element rather than a mitigation measure allows the City to avoid legal obligation to implement the element. (Cal. Code Regs. tit. 14, § 15126.4(a)).

I12

Similarly, the CAP strategies listed in appendix C are not discussed to a sufficient extent to be adequately deemed infeasible. Other than the lack of formal ordinance, the DEIR does not discuss why ZNE or ZEV fleet technology would be infeasible for this Project.

I13

Thus, the conclusion that further mitigation is infeasible was not supported by substantial evidence; there are other readily available mitigation measures. The City and Applicant together can commit to design and technology specifications that reduce emissions, especially in the heavy-duty truck and transportation vehicle fleet. Further, the City can choose to further reduce energy usage by adopting more green building features beyond which have already been incorporated by existing mitigation measures. Such features could be adopted individually or as part of a comprehensive goal of sustainable building certification, such as Leadership and Energy and Environmental Design (LEED), that extends further beyond CALGreen requirements.

I14

Even after implementing on-site emissions reductions to the maximum-feasible extent, the City could impose mitigation which would address the Project's mobile-related GHG impact and heavy-duty truck emissions. The City could require the Applicant to enter into an agreement to have a zero-

² $(43,738.5 - 40,965.7 \text{ MTCO}_2\text{e}) / (43,738.5 \text{ MTCO}_2\text{e}) = 0.0634$

emission heavy-duty truck fleet as soon as feasible. The Project should include heavy-duty truck EV charging stations for more than 10% of the total truck docks. (DEIR, p. 2-25.) The City did not provide substantial evidence to support that charging stations at 10% of the truck loading docks would be the maximum feasible amount of heavy-duty charging stations.

The City could also require the applicant to apply for grants through the Carl Moyer program for clean fleets, and enroll in EPA's SmartWay program to improve logistics efficiency. The City could also require the Applicant to purchase offsets to the extent necessary to mitigate the Project's emissions to the fullest extent possible. Overall, the lead agency carries the burden of including an adequate discussion of feasible mitigation measures for significant impact, including adopting all feasible mitigation measures and identifying the reasons for infeasibility. The failure to do so here is a violation of CEQA and insufficient to meet the City's burden.

I14

Threshold is Not Supported by Substantial Evidence

The City did not provide substantial evidence to support the use of a 10,000 MTCO₂e numerical significance threshold. The SCAQMD's rationale for adopting its 10,000 MTCO₂e numerical threshold does not apply to this Project. The SCAQMD recommended the threshold based on the rationale that it would reduce 90% of emissions from projects for which the SCAQMD is the lead agency. To arrive at the threshold, SCAQMD reviewed the natural-gas consumption for projects it permitted in 2006 and 2007, assuming that the vast majority of emissions came from burning natural gas. These tend to be heavy industrial projects such as manufacturers of cement and steel. The SCAQMD is not a lead agency for land use projects generally, which include "shopping malls, housing tracts, commercial or industrial parks, sports stadiums, etc."³ Since the City cannot rely on the SCAQMD's threshold, CEQA requires the City to support its choice of threshold with substantial evidence, which it fails to do here.

I15

The significance threshold for this project was chosen in reliance on a 2008 study where SCAQMD offered an "interim CEQA GHG significance threshold of 10,000 MTCO₂e per year for stationary source/industrial projects for which the SCAQMD is the lead agency." (DEIR, p. 4.8-20.) Here, SCAQMD is not the lead agency and there is not substantial evidence to support the application of this archaic standard, especially considering the working group has not met since 2010.

The past fifteen years have seen unprecedented societal change and technological advancements, making it easier and cheaper to employ emission reducing technology. This has significantly changed the extent of feasible mitigation measures and should be reflected in lower significance thresholds. It is unreasonable to rely on an interim standard from 2008 without more nuanced analysis based on substantial evidence from current data and information. The City has information available to

³ <https://www.aqmd.gov/home/rules-compliance/ceqa/frequently-asked-questions#:~:text=The%20South%20Coast%20AQMD%20typically,previously%20undergone%20a%20CEQA%20analysis>

determine an applicable significance threshold and support it with substantial evidence given the current regulatory setting, so there is no justification for this improper reliance on an inapplicable threshold.

Furthermore, this standard was developed to only apply to stationary industrial projects. The Project here is mixed-use because it contains both industrial and office spaces, so the default threshold should have been 3,000 MTCO₂e per year if the City was truly following the SCAQMD guidelines. (DEIR, p. 4.8-20.) They have not provided substantial reasoning or evidence to support the more relaxed threshold.

I15

Comparison of Project Phases to Threshold is Misleading

CEQA helps protect California's environment by requiring potentially significant environmental impacts to be analyzed and then reduced to the degree feasible. Through this process, information is disclosed for decision-makers and the public to fully understand the extent of environmental impacts. CEQA guidelines section 15064.4, subdivision (a) states that a lead agency is to "make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of greenhouse gas emissions resulting from a project." In doing so, it must be presented clearly as to not be confusing or misleading to the decision-makers or the public. (Cal. Code Regs. tit. 14, § 15140.)

Here, the Table 4.8-10 presents the data in a way that could be easily misinterpreted by the public and decision-makers. Rather than presenting total Project emissions as a clear, consolidated figure, the table only lists emissions for each phase individually, each compared to the 10,000 MTCO₂e threshold. (DEIR, p. 4.8-31.) This creates an impression that the Project would exceed the threshold by a lesser degree than it does. GHGs have a cumulative impact, regardless of the phase they originate from, so there is no compelling reason to compare the total SCAQMD threshold to the phases separately. Presenting the threshold twice in the data table indicates that the standard applies individually to each phase, not to the whole project, essentially representing a 20,000 MTCO₂e significance threshold. Thus, the data tables were misleading of the chosen significance threshold of 10,000 MTCO₂e. The DEIR should have included a discussion of the impact of the Project as a whole, rather than compartmentalized into phases that minimize the impact of each phase in relation to the threshold.

I16

The Project Would Have a Significant Impact Under the Second Threshold

Lead agencies must support their determinations by substantial evidence and should communicate the overall GHG significance determination in a way that does not mislead decision-makers and the public as to the Project's impacts. Here, the City summarized the GHG impact under its second chosen threshold as "[l]ess than [s]ignificant," because it determined that the Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHGs.

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(DEIR, p. 4.8-41.) However, this is misleading because the Project would conflict with several applicable plans. Further, the City failed to support its significance conclusion under the second chosen threshold by substantial evidence.

The City chose to analyze, as one of its adopted significance thresholds, whether the Project would “[c]onflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.” (DEIR, p. 4.8-21.) This language requires a discussion of all applicable documents, not just chosen plans that the City prefers to analyze. The DEIR included a discussion of the California Air Resources Board (CARB) 2022 Scoping Plan, Title 24 BEES and CalGreen Code, CARB’s Sustainable Freight Action Plan, Connect SoCal 2024, and the Rancho Cucamonga Climate Action Plan (CAP), to support its determination that the Project would not conflict with an applicable plan, policy, or regulation for GHG emissions reductions. The 2017 CARB Scoping Plan is notably excluded from the discussion of applicable plans. This significance analysis violates CEQA by erroneously overlooking the Project’s conflict with the 2022 Scoping Plan and 2017 Scoping Plan and failing to acknowledge and analyze all applicable plans for the reduction of GHGs.

The Project would conflict with the 2022 Scoping Plan, which sets a goal for 50% of all industrial energy demand to be electrified by 2045 (2022 CARB Scoping Plan, p. 77).⁴ The DEIR makes no showing that the Project is consistent with this goal. The 2022 CARB Scoping Plan also places particular emphasis on sustainable manufacturing and the decarbonization of industrial facilities by “displacing fossil fuel use with a mix of electrification, solar thermal heat, biomethane, low- or zero-carbon hydrogen, and other low-carbon fuels to provide energy for heat and reduce combustion emissions.” (2022 CARB Scoping Plan, p. 208). The Project does not appear to be consistent with this goal, based on the analysis provided in the DEIR. The Project creates a conflict with the 2022 Scoping Plan by its reliance on fossil fuels in its operations.

Similarly, the Project would conflict with the 2017 Scoping Plan, which is still in effect because the goals have not yet been achieved. The CARB 2017 Scoping Plan was developed to help California comply with SB 32, which mandates a 40% reduction in GHG emissions below 1990 levels by 2030 (Health & Safety Code § 38566). The DEIR failed to analyze whether the Project is consistent with the objectives of the 2017 Scoping Plan and does not explain how the Project aligns with the 2050 goal of reducing emissions by 80% below 1990 levels. (DEIR, p. 4.8-18 – 4.8-22.)

Moreover, the 2017 Scoping Plan sets statewide per capita GHG emissions targets of 6 MTCO₂e by 2030 and 2 MTCO₂e by 2050. (2017 CARB Scoping Plan, p. 99.)⁵ The Project would significantly overshoot, and thus conflict with, the 2030 target because even with thermal recovery, the Project would emit nearly 150 MTCO₂e per service population.⁶ Given that the more stringent 2050

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⁴ 2022 Scoping Plan located at: <https://ww2.arb.ca.gov/sites/default/files/2023-04/2022-sp.pdf>

⁵ 2017 Scoping Plan located at: https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf

⁶ 29,575.4 MTCO₂e Phase 1 + 40,965.7 MTCO₂e Phase 2 with Thermal Recovery = 70,541.1 MTCO₂e Project emissions with Thermal Recovery

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target must be achieved within the Project's operational lifespan, it is evident that the Project will remain inconsistent with the 2017 Scoping Plan's long-term goals. Therefore, the Project directly conflicts with the 2017 Scoping Plan and SB 32.

The DEIR also fails to provide sufficient reason for their refusal to adopt the strategies outlined in the CAP. The City asserts that the Project is not required to implement the strategies because they are not legally binding at this point. However, these CAP strategies represent feasible mitigation strategies which need to be analyzed as potential mitigation measures. It is improper to reject these available mitigation strategies simply because it is not mandated by a specific ordinance in place.

I17

Consequently, because the Project is inconsistent with applicable plans for the reduction of GHGs, it is significant under the second threshold. The City's determination that the Project would have a less-than-significant impact as to the second GHG threshold is not supported by substantial evidence.

Conclusion

The Project's mitigated annual emissions, without thermal recovery, were estimated at 73,720.5 MTCO₂e, and the reasonable lifespan this Project is approximately 30 years, as indicated by the amortization of construction emissions. (DEIR, p. 4.8-29.) Therefore, the Project would likely contribute to approximately 2,211,615 MTCO₂e during its entire lifespan.⁷ This will have a significant effect on California's environment and necessitates robust mitigation. The DEIR fails to require all feasible mitigation, despite concluding that the significant GHG impact will be unavoidable. The lead agency has not met its burden of showing that such measures are infeasible, and therefore the DEIR should be amended to reflect all feasible mitigation to the fair-share extent.

I18

Please put Advocates for the Environment on the list of interested parties to receive updates about the progress of this potential project approval. We make this request under Public Resources Code, section 21092.2.

Sincerely,



Aria Soeprono
Staff Attorney, Advocates for the Environment

Emissions estimates from Table 4.8-10, DEIR p. 4.8-32

$70,541.1 \text{ MTCO}_2\text{e} \div 474 \text{ employees}$

$= 148.82 \text{ MTCO}_2\text{e per service population, rounded to the nearest hundredth place.}$

DEIR, p. 3-46, referencing the number of employees.

$^{7} 73,720.5 \text{ MTCO}_2\text{e per year} \times 30 \text{ years} = 2,211,615 \text{ MTCO}_2\text{e}$

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ID	Response to Comment Letter I – Advocates for the Environment
I-1	The commenter provides introductory remarks that accurately summarize the Project in a general manner and states it is submitting comments on the sufficiency of the DEIR's GHG emissions analysis. Comment noted. Refer to responses to comments I-2 to I-18 for detailed responses to specific comments on the DEIR's GHG emissions analysis.
I-2	The commenter suggests that the EIR adopt a net-zero GHG threshold and that the Project must be required to be net-zero. First, as a point of clarification, under CEQA, a lead agency is entitled to discretion with respect to the methodology used, and the thresholds of significance applied, to the evaluation and determination of the significance of a project's GHG emission impacts. The City directs the commenter to DEIR Section 4.8.4 (pp. 4.8-19 to 4.8-22) for the DEIR's explicit discussion and selection of an appropriate GHG emissions threshold for the proposed project. The City notes comment I-2 does not provided any specific remarks on the discussion and justification provided in the DEIR on the City's applied GHG emissions thresholds. As explained in this section, the City used of the SCAQMD's 10,000 metric tons carbon dioxide equivalents (MTCO₂e) industrial facility because this threshold is based on substantial regional evidence, aligns with State climate change goals, and represents a conservative numeric approach to evaluating the proposed Project because the proposed Project includes a variety of GHG emissions sources, not just stationary sources. The commenter presents no evidence that the DEIR's threshold is inappropriate or would result in a significant impact that was not analyzed in the DEIR. Second, the City notes that the DEIR includes information commensurate with that provided by the commenter. The DEIR provides information on global CO₂ concentrations (p. 4.8-2), statewide GHG emissions levels from different sources (pp. 4.8-5 and 4.8-6), and the potential effects of climate change on various California resources (p. 4.8-4). The DEIR also includes detailed information on the regulations that govern GHG emissions, including AB 1279 (pp. 4.6-15 and 4.8-11), which established the State's policy to achieve net zero GHG emissions as soon as possible, but no later than 2045, and achieve and maintain net negative GHG emissions thereafter, and to ensure that by 2045, statewide anthropogenic GHG emissions are reduced to at least 85% below the 1990 levels, and the 2022 Scoping Plan (pp. 4.8-11 to 4.8-12) The commenter, therefore, does not provide any new information that the City has not considered during the preparation of the DEIR. Third, the commenter's general references to CEQA lawsuits do not have any bearing to the project at hand because the commenter has not specifically identified similarities between the referenced cases and the proposed project. While CEQA case law establishes general precedence, such general precedence is to be applied to the specific setting, information, and circumstances under which a particular project is approved. Finally, the commenter is directed to the DEIR's discussion of the project's consistency with the 2022 Scoping Plan (pp. 4.8-33 and 4.8-34), which is fully entitled the 2022 Scoping Plan for Achieving Carbon Neutrality. This analysis identifies that achieving statewide carbon neutrality is a complicated endeavor, requiring reductions from various sources, including energy generation and mobile sources. It also recognizes that carbon neutrality will require technological advances, including deploying carbon capture and other GHG-reducing technologies, and describes the

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	Project's with the Scoping Plan's strategies to address key emission sectors and align local actions with State climate goals (transportation electrification, VMT reductions, and building decarbonization). The DEIR concludes that Project design features and Mitigation Measures AIR-2C, AIR-2D, AIR-2E, GHG-1, and GHG-2 would support the overarching goals of the 2022 Scoping Plan. The commenter does not provide any specific evidence against this conclusion or otherwise indicating the project would not be consistent with the 2022 Scoping Plan. For the reasons described above, the commenter has not provided any specific evidence for why a net zero threshold is appropriate for the proposed project or why the DEIR's thresholds are not supported by substantial evidence.
I-3	The commenter identifies the Project's total annual GHG emissions level as 73,720.5 MTCO₂e, accurately summarizes the significant and unavoidable impact finding for DEIR Impact GHG-1, states the City erroneously determined the DEIR Impact GHG-2 would be less than significant, and argues that a finding of significance for Impact GHG-1 requires the same finding of significance for Impact GHG-2. These are general remarks that do provide specific evidence or information for the City to address. Refer to response to comment I-4 for a detailed response to specific comments on the DEIR's GHG analysis, and to response to comments I-8, I-13, and I-17 for a detailed responses on why the DEIR's conclusion that the Project would not conflict with an applicable plan, policy, or regulation adopted for the purposes of reducing GHG emissions is supported by substantial evidence. In addition, as a point of clarification, the City notes the commenter has not correctly identified the Project's total annual GHG emissions (see DEIR Table 4.8.6 to 4.8-10, as revised in Chapter 3 of this FEIR). The commenter has added the emissions from Phase 1 of the Project to the emissions from Phase 2 of the Project. This is incorrect. Phase 1 and Phase 2 Project emissions are not additive; rather Phase 2 of the Project expands on Phase 1. Thus, Phase 2 emissions include all Phase 1 emissions plus emissions from new sources and activities that would only occur under Phase 2 (e.g., cogeneration system operation). Thus, as shown in Chapter 3 of this FEIR, the proposed Project's revised total annual GHG emissions during Phase 2 are estimated to be up to approximately 43,907.8 MTCO₂e (maximum unmitigated) and 43,747.9 MTCO₂e (maximum mitigated).
I-4	The commenter provides an accurate general summary of the requirements and GHG emissions reductions associated with Mitigation Measures GHG-1, GHG-2, and AIR-3 through AIR-5 and asserts the DEIR did not provide substantial evidence that these measures represent the only feasible mitigation measures reducing the significance of the Project's GHG emissions impacts, claiming there are other feasible mitigation measures that the City should have considered and adopted to reduce the significant GHG impact identified in the DEIR. As a point of clarification, the City has revised the EIR to correctly cross reference air quality Mitigation Measures AIR-2C, AIR-2D, and AIR-2E, which were inadvertently referred to as Mitigation Measures AIR-3 to AIR-5 in some sections of the DEIR's GHG analysis (see Chapter 3 of this Final EIR). The commenter's other remarks represent general and incorrect statements regarding the DEIR's GHG emissions analysis. The commenter's asserts that the conclusion the Project's GHG emissions would be significant and unavoidable is not supported by substantial evidence because the DEIR does not identify infeasible

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	mitigation measures; however, CEQA does not require an EIR to identify/specify potential mitigation measures and reject them as infeasible (<i>San Diego Citizenry Group v. County of San Diego</i> (2013) 219 Cal.App.4th 1, 15.) A fundamental purpose of an EIR is to identify ways in which a proposed project's significant environmental impacts can be mitigated or avoided. (Pub. Res. Code §§ 21002.1(a), 21081(a)(1).) To implement this statutory purpose, an EIR must identify and describe feasible mitigation measures for each of the project's significant environmental effects. (Pub. Res. Code §§ 21061, 21100(b)(3); CEQA Guidelines §§ 15121(a), 15126.4(a).) When it approves a project, the agency must adopt any feasible mitigation measures identified in the EIR that would mitigate or avoid the project's significant environmental impacts. (Pub. Res. Code §§ 21002.1(b); 21081(a)(1); CEQA Guidelines §§ 15022, 15091(a)(1).) However, CEQA does not require analysis of every imaginable mitigation measure. (<i>Gilroy Citizens for Responsible Planning v. City of Gilroy</i> (2006) 140 Cal.App.4th 911, 935; <i>San Franciscans for Reasonable Growth v. City & County of San Francisco</i> (1989) 209 Cal.App.3d 1502, 1519.) An EIR should focus on mitigation measures that are feasible, practical, and effective. (<i>Napa Citizens for Honest Gov't v. Napa County Bd. of Supervisors</i> (2001) 91 Cal.App.4th 342, 365; <i>Concerned Citizens of S. Cent. L.A. v Los Angeles Unified Sch. Dist.</i> (1994) 24 Cal.App.4th 826, 841.) Here, the DEIR affirmatively incorporated all feasible mitigation measures and the FEIR augments some of these measures in response to comments B-8 and F-13, and the City is not required to speculate about the measures the commenter believes should be considered or implemented in the DEIR. The City notes the Project includes design features and the DEIR incorporates mitigation to address GHG emissions from nearly all of the project's GHG emissions sources, including construction GHG emissions, building envelope and systems GHG emissions, appliance GHG emissions, passenger vehicle and truck trip emissions, and commercial and industrial yard equipment GHG emissions.
I-5	The commenter asserts DEIR Mitigation Measure AIR-4 is vague and unenforceable. The City directs the commenter to response to comment H-15 for information on why the DEIR's VMT mitigation measures are not vague and unenforceable.
I-6	The commenter again asserts, in a general and non-specific manner, that the DEIR's conclusion that the Project will not be able to achieve mitigation beyond that identified in the DEIR is not supported with substantial evidence, and that the DEIR should have proposed features to the maximum feasible extent. Refer to response to comment I-4 for the City's response to general and non-specific comments on the DEIR's GHG mitigation measures. In addition, Findings for mitigation feasibility are made in conjunction with the Findings and Statement of Overriding Considerations document which is separate from the DEIR and FEIR documents but part of the overall EIR administrative record.
I-7	The commenter asserts Mitigation Measure GHG-1 was not implemented to the maximum extent feasible because it can be bolstered to apply to all appliances installed as part of the Project. While it is true, as a general fact, that the Energy Star program does include other products not listed in Mitigation Measure GHG-1, the commenter does not provide any specific evidence for why Mitigation Measure GHG-1 is deficient. As part of the EIR process, the City considered all aspects of the Project's potential energy use (see DEIR Section 4.6) and the GHG emissions associated with this energy use, and tailored Mitigation Measure GHG-1 to account

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	for project-specific factors, such as the fact that the proposed Project is a beverage manufacturing and distribution facility that will include integrated industrial and non-industrial areas that are likely to require the installation of high capacity commercial grade equipment. The proposed Project also includes on-site energy generation systems (e.g., solar PV and cogeneration) and would be subject to Mitigation Measure GHG-2, which requires the Project to exceed Title 24 Building Energy Efficiency Standards by a minimum of 5%. Thus, the City has tailored Mitigation Measure GHG-1 to address smaller sources of energy consumption that are best addressed by the Energy Star program's product standards, and the commenter does not provide any specific evidence that this is erroneous or deficient.
I-8	The commenter states CAP Strategy 3.2 is applicable to the Project, that Mitigation Measure GHG-2 is “underinclusive” because it only requires a 5% improvement over standard building design, and that it is feasible for the Project to reach zero net energy. With regards to the City’s CAP, the DEIR is clear (pp. 4.8-21 and 4.8-36) that the proposed Project is not eligible for streamlining the analysis of GHG emissions pursuant to the City’s CAP. CAP Strategy 3.2 states, “Adopt an ordinance or update development code requiring new non-residential development to meet a standard of zero net energy”. As explained in the DEIR, the City has not fully implemented this measure and, therefore, the Project cannot conflict with a requirement that does not yet exist. With regards to Mitigation Measure GHG-2 and zero net energy, the City directs to the commenter the DEIR’s analysis of the proposed Project’s potential energy impacts (DEIR pp. 4.6-22 to 4.6-39), which clearly discloses the Project’s use of energy resources and the energy conservation features included in the Project design and concludes the Project would not result in the unnecessary, wasteful, or inefficient use of energy resources, nor conflict with a plan for renewable energy and energy efficiency. The commenter does provide any specific evidence demonstrating zero net energy is feasible for the specific project under evaluation. As described and evaluated throughout the DEIR, the proposed Project involves manufacturing process that require electricity and natural gas consumption, and the Project includes numerous design features to reduce all forms of energy consumption, including an on-site solar PV generation system, a battery energy storage system, a cogeneration system that provides 20 gigawatt-hours of net electricity per year as well as recoverable waste heat that reduces natural gas consumption, CO₂ recovery systems to reduce trucking emissions, and mitigation measures that reduce energy consumption by appliances, cars, trucks, and other building systems. In addition, the Project would use ZE technologies for all yard equipment, which reduces emissions but increases facility electricity demand. As part of the EIR process, the City considered all aspects of the Project’s potential energy use, determined that zero net energy would not be feasible for the Project, and tailored Mitigation Measure GHG-2 to achieve feasible energy efficiency improvements for the Project. The commenter’s remarks do not provide any specific evidence of information that this approach is erroneous or deficient.
I-9	The commenter states Mitigation Measure AIR-2C and AIR-2E can be modified to incorporate more impactful and enforceable standards, instead of relying on employee lifestyle changes and personal decisions that can’t be held accountable,

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	and should require the use of ZE and NZE vehicles for commercial and industrial operations. Mitigation Measure AIR-2C and AIR-2E impose additional, enforceable mitigating actions that support the expansion of existing and future ZE and NZE technologies. The City notes it is not feasible for the Project to mandate employee commute patterns because individual commute patterns are variable and speculative and outside the regulatory authority of any entity. While it is feasible for the Project to design and plan for increasing ZE and NZE vehicle deployment, there is uncertainty regarding the future availability and timing of ZE and NZE heavy-duty truck technologies (see response to comment B-87 and F-13) and, therefore, the City has determined that it is not feasible to require the Project to use all ZE or NZE vehicles in its operations. The City concurs that the ultimate effectiveness of Mitigation Measure AIR-2C is dependent on factors that are outside the control of the Project; however, this fact is independent of the Project's ability to plan and design for an increasing share of ZE and NZE vehicle technologies.
I-10	The commenter repeats the same general assertion from comment I-4 that the conclusion the Project's GHG emissions would be significant and unavoidable is not supported by substantial evidence because the DEIR does not identify infeasible mitigation measures nor confirm included mitigation measures represent maximum feasible mitigation. As explained in detail in response to I-4, the DEIR affirmatively incorporated all feasible mitigation measures and the City is not required to speculate about the measures the commenter believes should be considered or implemented in the DEIR.
I-11	The commenter identifies that Mitigation Measure AIR-2D is applied to reduce the Project's air quality, GHG, and transportation impacts, and asserts that VMT metrics are not sufficient for GHG emissions analysis because GHG analysis requires consideration of factors such as type, fuel efficiency, etc. The commenter's remarks are not clear. Mitigation Measure AIR-2D requires the Project to implement a travel demand management program that achieves a minimum VMT reduction of 4.9% from employee-based trips. The DEIR (p. 4.3-57) thus applies a 4.9% reduction to CalEEMod-estimated employee VMT, which is calculated using data from CARB's EMFAC model that incorporates region-specific vehicle population, fuel efficiency, and other data. Thus, the DEIR's analysis of the effectiveness of Mitigation Measure AIR-2D did consider the factors that are specific to air quality and GHG emissions reductions. In addition, the commenter does provide additional information or evidence for what "additional data methodologies" the DEIR should have considered.
I-12	The commenter asserts that the fact that thermal recover is presented as an option under Phase 2 is evidence that the technology is feasible, and that identifying this feature as a project element rather than a mitigation measure allows the City to avoid implementing thermal recovery features. The commenter is incorrect. The applicant has proposed, and the EIR has evaluated, Phase 2 options with and without thermal recovery precisely because it is not certain at this time that the proposed combined heat and power cogeneration system will meet all technical, logistical, and economic requirements to make installation of the system feasible for the applicant. Accordingly, since this feature could be installed, the EIR discloses the Project's potential air quality

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	and GHG emissions levels with and without this Project, determines the significance of the Project's emissions without such a system and applies feasible mitigation measures are capable of reducing the Project's emissions. This feature cannot be included in the EIR as a mitigation measure precisely because its feasibility is not guaranteed at this time.
I-13	The commenter asserts the CAP strategies listed in DEIR Appendix C are not discussed to a sufficient extent to be adequately deemed infeasible; however, the commenter does provide an examples of, nor request, what types of specific information could be added to the DEIR. Thus, the City considers this a general remark that lacks sufficient detail to provide a detailed response. The commenter also states the DEIR does not discuss why zero net energy or ZE fleet technology would be infeasible for the Project. As explained in detail in response to I-4, the DEIR affirmatively incorporated all feasible mitigation measures and the City is not required to speculate about the measures the commenter believes should be considered or implemented in the DEIR. Refer to response to comment B-8 and F-13 for detailed information and responses regarding the feasibility of zero net energy and ZE vehicle technologies for the Project.
I-14	The commenter submits several remarks on the DEIR's GHG analysis: • The commenter repeats claims that the DEIR's conclusion further mitigation is infeasible was not supported by substantial evidence. As explained in detail in response to I-4, the DEIR affirmatively incorporated all feasible mitigation measures and the City is not required to speculate about the measures the commenter believes should be considered or implemented in the DEIR. • The commenter generally asserts the City and applicant can commit to measures that reduce emissions, especially in the heavy-duty truck fleet. This comment does not include any specific information or evidence for the City to respond to. The City notes Mitigation Measure AIR-2E has been revised to include the use of eight ZE or NZE trucks within one year of the Project's certificate of occupancy. The commenter is directed to response to comment B-8 and F-13 for detailed information regarding the feasibility of ZE vehicle technologies for the Project. • The commenter asserts the City can chose to further reduce energy use by adopting green building features such as Leadership and Energy and Environmental Design (LEED) certification. The commenter does not provide information or evidence for why this measure is required. The City notes the DEIR's concluded the Project would not have a significant impact with regard to energy resources that requires mitigation. In addition, as described in response to comments I-8 and F-14, the DEIR considered all aspects of the Project's potential energy use and resulting GHG emissions, includes site and building design features that reduce energy use, and tailored Mitigation Measure GHG-2 to achieve feasible GHG emissions reductions for the Project. • The commenter again asserts the City could impose mitigation to address mobile source GHG emissions, such as ZE fleet deployment and that the DEIR lacked substantial evidence demonstrating the requirement to require electric

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	vehicle service equipment at 10% of total truck docks (Mitigation Measure AIR-2E, Part 1, subpart d) was the maximum feasible requirement for the Project. The commenter is directed to responses to comments I-4, B-8, and F-13. The DEIR, as revised, has affirmatively incorporated all feasible mitigation measures and the City is not required to speculate about the measures the commenter believes should be considered or implemented in the DEIR. The commenter generally suggests, without project-specific relevance, that the City could require the applicant to apply for grants, enroll in the U.S. EPA Smart Way program, purchase offsets to mitigate the Project emissions. The City notes it has revised the DEIR to include sharing information on the HVIP incentive program (see FEIR Chapter 3), and the commenter is directed to response to comments B-8 and H-30 for detailed information on the suitability and feasibility of incentive funding, Smart Way Program, and GHG emissions offsets for the Project.
I-15	The commenter asserts the City did not provide substantial evidence to support the DEIR's use of the SCAQMD's 10,000 MTCO₂e numerical significance threshold, provides background and context on the SCAQMD's development of this threshold, and then notes the City has information available to determine an applicable significance threshold, alluding to the SCAQMD's mixed-use project threshold as a more appropriate threshold to use for the Project. The City disagrees with the commenter that the DEIR lacks evidence to support the use of the SCAQMD's interim threshold for stationary sources directs the commenter to DEIR Section 4.8.4 (pp. 4.8-19 to 4.8-22), which includes an explicit discussion on the selection of the GHG emissions threshold for the proposed Project. The City also disagrees with the commenter's characterization of the Project as a mixed-use project. As described in the DEIR, the objectives of the Project include, in part: - Redevelop an existing industrial site with modern and sustainable facilities, including large-scale buildings, intricate manufacturing processes, and large employment opportunities. - Develop and operate an attractive state-of-the-art manufacturing and distribution facility in the City that meets industry standards to be competitive with similar facilities in the region. - Develop and operate a production and bottling facility that positively contributes to the local economy through new capital investment and the creation of new employment opportunities, including opportunities for highly-trained workers. - Develop an industrial and manufacturing facility that is in close proximity to Interstate 10, Interstate 15, and other major transportation arterial roadways, to support the production of consumer goods and the distribution of manufactured goods throughout the region. - Implement a microgrid energy production system via cogeneration at an existing manufacturing site to minimize manufacturing waste and to reduce the demand on existing public services and systems while employing carbon-reducing technologies and reduce the facility's potential climate impact.

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	These objectives clearly establish that the Project involves the development of an industrial manufacturing plan, not a mixed-use project, that contains large stationary sources of the type specifically envisioned by the SCAQMD during the development of its interim threshold. The City, therefore, disagrees with the commenter that its selection of the SCAQMD's interim threshold for stationary sources is not supported by substantial evidence. Finally, the commenter asserts the City has “information available to determine an applicable significance threshold” but does not specifically identify what that information is, nor provide specific fact-based recommendations on what an appropriate GHG threshold should be. Thus, the commenter has provided evidence that demonstrates the threshold used in the DEIR was erroneous or deficient.
I-16	The commenter asserts the DEIR does not present information clearly because Table 4.8-10 presents data in a way that “could” be easily misinterpreted by the public and decision makers, claims the EIR provides the impression the Project impact would be less than it is, and concludes the data tables were misleading of the City's chosen significance threshold of 10,000 MTCO₂e. The commenter's remarks appear to refer to a hypothetical situation that has not occurred (i.e., the misinterpretation of the DEIR). The City has not received any comments from agencies or the public expressing confusion regarding the magnitude of the Project's emissions impacts, nor the GHG emissions threshold used in the DEIR. In fact, the commenter themselves has repeatedly identified the GHG threshold used by the DEIR in multiple instances. While the commenter focuses on DEIR Table 4.8-10, the City notes the DEIR text under Impact GHG-1, including Tables 4.8-6 to 4.8-10, clearly evaluate the “worst-case emissions for each Project phase (p. 4.8-26) and conclude “As shown in Table 4.8-6, the proposed Project would result in a net increase in annual GHG emission compared to existing conditions for all phases and operating scenarios that is above the SCAQMD's industrial threshold of 10,000 MTCO₂e per year.” The City notes the DEIR does not make any mention of a 20,000 MTCO₂e per year threshold used to evaluate GHG emissions. The City affirms for the commenter that the DEIR quantifies GHG emissions for each Phase and compares the total emissions for each phase against the SCAQMD's 10,000 MTCO₂e threshold. It should be noted the Project did not take any credit for potential participation in the state's cap and trade program so the analysis is not misleading per guidance from <i>Center for Biological Diversity v. County of Los Angeles</i> (State Court of Appeal Docket B330610).
1-17	The commenter expresses disagreement with DEIR's conclusion that the proposed Project would not conflict with an applicable plan, policy, or regulation adopted for the purposes of reducing GHG emissions; however, this disagreement does not constitute substantial evidence that the DEIR's analysis is erroneous or deficient, nor does it constitute evidence that the Project would, in fact, have a substantial conflict with an applicable plan, policy, or regulation adopted for the purposes of reducing GHG emissions. The commenter asserts the DEIR did not evaluate consistency with the 2017 Scoping Plan. The commenter is partially correct. While the DEIR describes

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	the 2017 Scoping Plan (p. 4.8-11), it does not include an explicit discussion of the Project’s consistency with this plan. This is because the 2022 Scoping Plan represents the most up to date plan for achieving compliance with the State’s GHG reduction target for 2030. As stated in the DEIR (p. 4.8-11), the 2022 Scoping Plan “presents a scenario for California to meet the State goal of reducing GHG emissions 40% below 1990 levels by 2030 and to achieve carbon neutrality by 2045. Specifically, the 2022 Scoping Plan “identifies a path to keep California on track to meet its SB 32 GHG reduction target of at least 40 percent below 1990 emissions by 2030.” Furthermore, the 2022 Scoping Plan itself states (p. 4), “Four scenarios were extensively modeled to develop this Scoping Plan, with the objective of informing the most viable path to remain on track to achieve our 2030 GHG reduction target, a reduction in anthropogenic emissions by 85% below 1990 levels, and carbon neutrality by 2045. All four have their merits and are informed by stakeholder input. The scenario ultimately chosen as the basis of this Scoping Plan is the alternative that most closely aligns with existing statute and Executive Orders. It was selected because it best achieves the balance of cost-effectiveness, health benefits, and technological feasibility.” The 2022 Scoping Plan also states (p. 24), “The 2022 Scoping Plan for Achieving Carbon Neutrality (Scoping Plan) is the most comprehensive and far-reaching Scoping Plan developed to date. It identifies a technologically feasible and cost-effective path to achieve carbon neutrality by 2045 while also assessing the progress California is making toward reducing its GHG emissions by at least 40 percent below 1990 levels by 2030, as called for in SB 32 and laid out in the 2017 Scoping Plan.” Importantly, the 2022 Scoping Plan also identifies and plans for an accelerated 2030 GHG reduction target (48% below 1990 emissions by 2030) that is above and beyond the 2017 Scoping Plan requirements. Therefore, the DEIR’s evaluation of consistency with the 2022 Scoping Plan also evaluates consistency with previous versions of the Scoping Plan. As shown in FEIR Chapter 3, the City has revised the EIR to be more clear that the evaluation of the Project’s consistency with the 2022 Scoping Plan would also be apply to the 2017 Scoping Plan; however, the City notes that the specific per capita GHG thresholds that were contained in the 2017 Scoping Plan and referenced by the commenter are not relevant to the Project, because: 1) The 2022 Scoping Plan implements an accelerated 2030 target to support achievement of the State’s longer term goals (i.e., the per capita targets identified in the 2017 Scoping Plan would no longer keep the State on track to achieve long-term GHG reduction goals); and 2) The 2017 Scoping Plan (p. 99) acknowledged that the recommended per capita thresholds were “appropriate for the plan level (city, county, subregional, or regional level, as appropriate), but not for specific individual projects because they include all emissions sectors in the State.” Thus, the per capita metrics would not apply to a specific industrial development proposal such as the Project. • The commenter asserts the Project would conflict with the 2022 Scoping Plan because the plan establishes a goal for 50% of all industrial energy demand to be electrified by 2045; however, the commenter fails to provide any specific evidence or information for why the Project, as proposed, would result in an actual conflict with this Scoping Plan action. For example, while the

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	commenter correctly identifies that the Scoping Plan targets 50% of industrial manufacturing energy demand electrified by 2045, they fail to disclose that the plan also assumes 0% of industrial energy demand will be electrified by 2030, the timeframe in which the Project would be constructed. Furthermore, the 2022 Scoping Plan states (pp. 207 to 209, emphasis added), “Decarbonizing industrial facilities depends upon displacing fossil fuel use with a mix of electrification, solar thermal heat, biomethane, low- or zero-carbon hydrogen, and other low-carbon fuels to provide energy for heat and reduce combustion emissions. <i>Emissions also can be reduced by implementing energy efficiency measures and using substitute raw materials that can reduce energy demand and some process emissions. Some remaining combustion emissions and some non-combustion CO₂ emissions can be captured and sequestered.</i> The strategy employed will depend on the industrial subsector and the specific processes utilized in production . . . Electrification and solar thermal heat are best-suited to industrial processes that have relatively low heat requirements, such as food processors, paper mills, and industries that use low-pressure steam in their processes. Approaches could include replacing fossil gas boilers with electric boilers, process heaters with industrial electric heat pumps, steel forging furnaces with induction heaters, and implementing other sector-specific process electrification. <i>Under current rate structures for industrial electricity and fossil gas in California, most projects to electrify a fossil gas-powered industrial process will face operating cost barriers and potential reliability concerns. Microgrids powered by renewable resources and with battery storage are emerging as a key enabler of electrification and decarbonization at industrial facilities.</i>” Thus, the 2022 Scoping Plan acknowledges that, in the near-term many industrial projects will face cost barriers to electrification and energy efficiency measures, CO₂ capture, and renewable energy systems with battery storage and key strategies to support long-term electrification goals. As described in the DEIR (p. 4.6-31), the proposed Project includes solar PV generation coupled with a battery energy storage system and a CO₂ recovery system. The Project would also include all-electric yard handling equipment. Thus, the Project would include strategies to electrify manufacturing processes well ahead of the timeline considered by the 2022 Scoping Plan. For these reasons, the Project would not conflict with the specific Scoping Plan action identified by the commenter. • The commenter asserts the DEIR did not evaluate how the Project aligns with the State’s 2050 goal of reducing emissions 80% below 1990 levels, which was originally established by Executive Order (EO B-30-15, see DEIR p. 4.8.10). Similar to the response provided above on the Project’s consistency with the 2017 Scoping Plan, the commenter is partially correct. AB 1279 (see DEIR p. 4.6-15) essentially accelerated the State’s 2050 goal by establishing a state policy to reduce anthropogenic emissions of GHGs to 85% below 1990 levels by December 31, 2045, achieve net zero GHG emissions by 2045, and maintain a net negative GHG emissions thereafter. Thus, consistency with AB1279 would yield consistency with the goal establishes in EO B-30-15, and the City notes the 2022 Scoping Plan states (p. 44) that AB 1279 “is reflected directly in this Scoping Plan.” Therefore, the DEIR’s evaluation of consistency

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	with the 2022 Scoping Plan also evaluates consistency with the State’s 2045 and 2050 goals. As discussed in DEIR Impact GHG-2 and above, the Project would be consistent with the 2022 Scoping Plan, and the commenter has not provided any specific information or evidence to the contrary. • The commenter asserts the DEIR fails to provide sufficient reason to adopt the GHG emissions reduction strategies contained in the City’s CAP, and that it is not proper to reject these available mitigation strategies because they are not mandated by a specific ordinance. As a point of clarification, Impact GHG-2 evaluates consistency with <u>applicable</u> plans, policies, and regulations adopted for the purposes of reducing GHG emission, and the Project cannot conflict with something that is either not in effect or existing at the time the EIR is prepared. Furthermore, as shown in Table 4.8-11, the DEIR does not reject potential mitigation strategies simply because there is no ordinance, implementing policy, etc. For example, CAP Strategy 3.3 (On-Site Renewable Energy Systems for New Industrial Buildings) is not applicable because the proposed Project is not located in the mandated Neo-Industrial and Industrial Employment zoning districts, but the Project still includes solar PV and battery energy storage systems. The City directs the commenter to response to comment I-8 for information on why certain CAP strategies that are identified as “not applicable” in Table 4.8-11 are also infeasible for the Project. Again, DEIR Section 4.8, Greenhouse Gas Emissions, Section 4.8.5, Impact GHG-2, does evaluate the Project relative to the City’s CAP which is summarized in Table 4.8-11, Summary of Project Consistency with CAP Strategies.
I-18	The commenter provides conclusionary remarks that are consistent with remarks in comments I-2 to I-17. The City directs the commenter to the responses prepared for these comments. As a point clarification, the commenter’s conclusionary remarks substantially overestimate the magnitude of the Project’s GHG emissions impacts (see response to comment I-3).

COMMENT LETTER J – CITY OF ONTARIO (EMAIL)

2.0 Response to Comments

7/3/25, 1:00 PM

Moore Iacofano Goltsman Inc Mail - FW: 20250424 Rancho Cucamonga Notice of Availability



LETTER J

Kent Norton <knorton@migcom.com>

FW: 20250424 Rancho Cucamonga Notice of Availability

2 messages

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Cc: "Vargas, Claudia" <Claudia.Vargas@cityofrc.us>

Thu, Jun 12, 2025 at 7:20 PM

See correspondence received regarding the El Camino project.

Thanks,

Sean

From: Jay Bautista <JBautista@ontarioca.gov>
Sent: Thursday, June 12, 2025 2:24 PM
To: Mcpherson, Sean <Sean.McPherson@cityofrc.us>; Vargas, Claudia <Claudia.Vargas@cityofrc.us>
Cc: Gwen Berendsen <GBerendsen@ontarioca.gov>; Khoi Do <KDo@ontarioca.gov>; Jaime Maciel-Carrera <JMCarrera@ontarioca.gov>; Diego Tapia <DTapia@ontarioca.gov>
Subject: RE: 20250424 Rancho Cucamonga Notice of Availability

Some people who received this message don't often get email from jbautista@ontarioca.gov. [Learn why this is important](#)

CAUTION: This email is from outside our Corporate network. Do not click links or open attachments unless you recognize the sender and can confirm the content is safe.

Sean and Claudia,

The City of Ontario has reviewed the VMT Assessment and LOS Report from the Draft EIR for the El Camino Project and has no comments.

Thank you for the opportunity to review and good luck with your project. Thanks.

Jay Bautista, P.E., T.E.
Traffic/Transportation Manager
City of Ontario
303 East B Street
Ontario, CA 91764
909-395-2120

<https://mail.google.com/mail/u/0/?ik=663d1de7a0&view=pt&search=all&permthid=thread-f:1834767296250736763&simpl=msg-f:1834767296250736763&simpl=msg-f:1836404103637578025>

J1

1/3

7/3/25, 1:00 PM

Moore Iacofano Goltsman Inc Mail - FW: 20250424 Rancho Cucamonga Notice of Availability

jbautista@ontarioca.gov

From: Gwen Berendsen <GBerendsen@ontarioca.gov>
Sent: Wednesday, April 30, 2025 9:56 AM
To: Khoi Do <KDo@ontarioca.gov>; Jay Bautista <JBautista@ontarioca.gov>
Subject: 20250424 Rancho Cucamonga Notice of Availability

Good Morning,

For your information and action if necessary.

Kind Regards,

GWEN BERENDSEN

Administrative Assistant

CITY OF ONTARIO | PLANNING DEPARTMENT

303 E B STREET, ONTARIO, CA 91764

Direct: 909-395-2423 | gberendsen@ontarioca.gov



Contact Planning Dept. at (909) 395-2036 or by email at PlanningCounter@ontarioca.gov for general Planning-related information.

 **20240424 Rancho Cucamonga Notice of Availability.pdf**
177K

Vargas, Claudia <Claudia.Vargas@cityofrc.us>
To: Kent Norton <knorton@migcom.com>
Cc: "McPherson, Sean" <Sean.McPherson@cityofrc.us>

Mon, Jun 30, 2025 at 8:56 PM

Hi Kent,

Resending this item, as I didn't see it listed in your summary. I'm not entirely sure if they need to be included in the FEIR, but I wanted to pass them along just in case.

Thank you,

<https://mail.google.com/mail/u/0/?ik=663d1de7a0&view=pt&search=all&permthid=thread-f:1834767296250736763&simpl=msg-f:1834767296250736763&simpl=msg-f:1836404103637578025>

2/3

2.0 Response to Comments

7/3/25, 1:00 PM

Moore Iacofano Goltsman Inc Mail - FW: 20250424 Rancho Cucamonga Notice of Availability

Claudia Vargas | Associate Planner

City of Rancho Cucamonga | Planning Department

Office: 909-477-2750 ext. 4312

claudia.vargas@cityofrc.us | www.cityofrc.us

[Quoted text hidden]

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3/3

ID	Response to Comment Letter J – City of Ontario (Email)
J-1	The City appreciates the City of Ontario's comment and no changes to the EIR are required

3.0 ERRATA

This section identifies revisions to the City of Rancho Cucamonga's El Camino Project Draft EIR to incorporate clarifications, corrections, or additions prepared in response to comments on the Draft EIR. These changes include minor errors or editorial corrections identified through subsequent review. Additions are shown in underline. Deletions are shown in ~~strike through~~. Commentary Notes on DEIR text changes are shown in *Italic type* where needed.

None of the revisions below represents a substantial increase in the severity of an identified significant impact or the identification of a new significant impact, mitigation, or alternative considerably different from those already considered in the Draft EIR.

BEGIN Draft EIR Global Correction #1

In several sections a typographical/editorial error occurred when the EIR Word document files were saved as PDF files and compiled into a single PDF document. During that translation process, there were sixteen (16) instances where a reference to a table, exhibit, or footnote ended up showing **Error! Reference source not found** rather than the specific table number, exhibit number, or footnote citation intended. For brevity and to minimize confusion for the reader, these transcription errors are all outlined below:

DEIR Section 4.3, Air Quality

1. *Page 4.3-16, 3rd paragraph, 2nd sentence...*The 37.4-mile one-way truck trip distance is a weighted average derived using the specific type and amount of truck trips generated by the existing site uses (see Table 4.3-6 ~~Error! Reference source not found.~~) and an assumed...

2. *Page 4.3-23, Table 4.3-8...*Source: SCAQMD⁵³~~Error! Reference source not found.~~

Added endnote refers to reference 53 at the end of Section 4.3

3. *Page 4.3-29, 2nd paragraph, 2nd sentence...*The SCAQMD's LSTs for this SRA and Project size are shown in Table 4.3-10 ~~Error! Reference source not found.~~ It is noted Table 4.3-10 includes LSTs...

4. *Page 4.3-32, 7th paragraph, 2nd sentence...*In addition, construction phasing and equipment assumptions from a representative groundwater well project were used to model and estimate CVWD groundwater well construction emissions.⁵⁴ ~~Error! Bookmark not defined.~~

Added endnote refers to reference 54 at the end of Section 4.3

5. *Page 4.3-43, 2nd paragraph, 1st sentence (bulleted)...* Truck Distribution: Consistent with the transportation impact analysis prepared for the Project, truck trip distribution was assigned to the local roadway network as follows:²⁸ ~~Error! Reference source not found.~~

Added endnote refers to reference 28 at the end of Section 4.3

Draft EIR Global Correction #1 (cont'd)

6. Page 4.3-43, 3rd paragraph, 1st sentence (bulleted)... Haven Avenue, North of Haven Avenue / 7th Street Intersection: 10% of in- and out-bound truck traffic was modeled as traveling to and from the site from the portion of Haven Avenue north of the site.²⁸ **Error! Bookmark not defined.**

Added endnote refers to reference 28 at the end of Section 4.3

7. Page 4.3-48, Table 4.3-16, Definition of CPF, 2nd sentence... The CPF for diesel exhaust is 1.1 mg/kg-day. See Appendix C3 **Error! Reference source not found.** for the project's stationary source TAC emissions CPFs.

8. Page 4.3-65, Table 4.3-28, Table notes... Source: See Appendix C1.2 and SCAQMD⁴² **Error! Reference source not found.**

Added endnote refers to reference 42 at the end of Section 4.3

9. Page 4.3-66, Table 4.3-29, Table notes... Source: See Appendix C1.2 and SCAQMD⁴² **Error! Reference source not found.**

Added endnote refers to reference 42 at the end of Section 4.3

10. Page 4.3-66, Table 4.3-30, Table notes... Source: See Appendix C1.2 and SCAQMD⁴² **Error! Reference source not found.**

Added endnote refers to reference 42 at the end of Section 4.3

11. Page 4.3-67, Table 4.3-31, Table notes... Source: See Appendix C1.2 and SCAQMD⁴² **Error! Reference source not found.**

Added endnote refers to reference 42 at the end of Section 4.3

12. Page 4.3-71, 2nd paragraph, 1st sentence... Table 4.3-34 **Error! Reference source not found.** below summarizes annual chronic, 8-hour chronic, and acute non-cancer risks at the MEIR and MESR.

13. Page 4.3-71, 3rd paragraph, 1st sentence... As shown in Table 4.3-34 **Error! Reference source not found.**, the proposed Project's TAC emissions would not result in noncancer risks at the MEIR or MESR locations that exceed the SCAQMD threshold of 1.0.

14. Page 4.3-72, 1st paragraph, 4th sentence... SCAQMD staff does not currently know of a way to accurately quantify ozone-related health impacts caused by NOX or VOC emissions from relatively small projects.⁵⁷ **Error! Reference source not found.**

Added endnote refers to reference 57 at the end of Section 4.3

DEIR Section 4.8, Greenhouse Gases

15. Page 4.8-25, footnote xii, 2nd sentence... This estimate accounts for full well production capacity. The project is only anticipated to consume approximately 863 AFY for bottling use, building use, and irrigation use.³³ ~~Error! Reference source not found.~~

Added endnote refers to reference 33 at the end of Section 4.8

Section 4.13, Noise

16. Page 4.13-30, 3rd paragraph, last sentence... Project traffic volumes were obtained from the TIA prepared for the Project and added to existing and future traffic volumes for the two key roads that would be used to access the Project site: Haven Avenue and 6th Street ⁴ ~~Error! Reference source not found.~~

Added endnote refers to reference 4 at the end of Section 4.13

END Draft EIR Global Correction #1

BEGIN Draft EIR Global Correction #2

[NOTE: There is a zoning title discrepancy throughout the document that references the onsite zoning classification as ME2 in some citations and ME-2 in other citations. The City indicates the proper format includes the hyphen so the editorial correction is any references to the zone ~~ME2~~ should be globally corrected to zone ME-2.]

END Draft EIR Global Correction #2

BEGIN Draft EIR Global Correction #3

[NOTE: Throughout the document, but particularly in the Project Description (3.0), there are references to "cooling towers" which are more accurately described as the "Pentair CO2 Recovery System and Adsorption System" since they are not for the purposes of cooling and emitting unwanted exhausts from stationary equipment but rather for the collecting and reuse of carbon dioxide (CO₂) in the beverage manufacturing process.]

END Draft EIR Global Correction #3

DEIR Section 3.3, Project Description – Existing Conditions (Site History), Page 3-9, paragraph 3

The Project site is partially developed with warehouse and office buildings and is surrounded by other industrial and commercial land uses in all directions. The Project site has a General Plan designation of 21st Century Employment District and is within the Mixed Employment 2 (ME2) zone. The Project site also has a Corridor Fronting Commercial and Retail Overlay along the Haven Avenue frontage. The Project will not require a general plan amendment or a change of zone. The site also has a former vineyard in the northern half of the Phase 1 property and the entire site has over 200 landscape trees throughout the site including along the north side of the former vineyard.

[NOTE: For background on zoning criteria subject to these overlay designations, please reference Development Code Section 17.130.040.B.]

DEIR Section 3.5, Project Description - Project Characteristics (Land Use Approvals), “Master Plan” bullet point, page 3-33

- Master Plan (DRC2023-00072)-The Project site is presently zoned ME-2 Mixed Employment designation with a Corridor Fronting Commercial and Retail Overlay along the Haven Avenue frontage. The Project Master Plan identifies specific exceptions to the zone development standards. It also includes building details, elevations, landscaping and fencing plans, and other design elements

[NOTE: For background on zoning criteria subject to these overlay designations, please reference Development Code Section 17.130.040.B.]

DEIR Section 3.5, Project Description - Project Characteristics (Land Use Approvals), “Tentative Parcel Map” bullet point, page 3-34

- Vesting Tentative Parcel Map (original SUB TPM20713 to VTPM 20713) – The proposed Vesting Tentative Parcel Map (VTPM) would include a request to consolidate the eight existing parcels and create three new parcels for the Project. The VTPM would create the following three lots: Parcel 1 would be approximately 25.39 acres in size for the new industrial buildings, parking structure and office building; Parcel 2 would be 0.68 acres and would provide a new access from 7th Street to the Project site; and Parcel 3 would be 3.88 acres and would encompass the existing 7th Street warehouse building and parking area. Additionally, three lettered lots would be created for access.

[NOTE: the applicant originally submitted a request for a Tentative Parcel Map but during the public review period of the EIR decided to eliminate the Development Agreement (see below) and instead use a Vesting Tentative Parcel Map (VTPM) to memorialize the various development fees associated with the parcel map.]

DEIR Section 3.5, Project Description - Project Characteristics (Land Use Approvals), “Development Agreement” bullet point, page 3-33

- ~~Development Agreement (DRC2024-00163): A statutory development agreement, pursuant to California Government Code Section 65864 et seq. and Rancho Cucamonga Development Code Section 17.22.060, may be processed concurrent with the approval of this Project that would provide the project applicant with assurance that development of the project may proceed subject to the rules and regulations in effect at the time of project approval. The Development Agreement would also provide the City of Rancho Cucamonga with assurance that certain obligations of the project applicant would be met, such as the required timing of public improvements, the Applicant's contribution toward funding community improvements, and other conditions. No physical changes in the environment (beyond those described herein) are assumed in connection with the Development Agreement.~~

[NOTE: the applicant originally submitted a request for a Tentative Parcel Map but during the public review period of the EIR decided to eliminate the Development Agreement and instead use a Vesting Tentative Parcel Map (see above) to memorialize the various development fees associated with the parcel map. With the VTPM, there would no longer be a need for a Development Agreement.]

DEIR Section 3.6, Project Design Features, page 3-47

Solar Energy/Battery Storage Systems. The Project will have rooftop photovoltaic (PV) solar panels to help offset its increased electrical energy use. The (PV) system will be capable of generating approximately 1.7 2.8 Megawatts of electricity at full operation and 2.8 Gigawatt-hours ~~Megawatt-hours~~ of electricity per year from on-site sources. Under Phase 2, the proposed Project would feature an approximately 2 Megawatt ~~2,000 kilowatt (kW)~~ rated battery energy storage system (BESS) which would allow the project to “bank” excess electricity generated at the site during the daytime hours and re-use it during the evening and nighttime hours when the PV system would not actively be generating electricity (i.e., because the sun would not be out).

DEIR Section 3.7, Intended Uses of the EIR, page 3-48**State and Regional Agencies**

State Water Resources Control Board, Division of Drinking Water for approval of a domestic water supply permit amendment of a new source and possible treatment changes (Cal. Code Regs. § 64556)

DEIR Section 4.1-1, Aesthetics, Table 4.1, Visual Impacts of Project Master Plan (added row), pages 4.1-15 to 4.1-17

Development Code Section/Provision	Development Code Standard	Project Master Plan (Code Exceptions)
<u>Corridor Fronting Ground Floor Use Restrictions (RCDC17.130.040.B)</u>	<u>Corridor fronting ground floor commercial and retail uses required.</u>	<u>The Master Plan proposes no commercial or retail use at the ground floor fronting the corridor.</u>

[NOTE: Rather than commercial or retail frontages along the ground-floor facing the corridor, the Project proposes manufacturing uses along the ground-floor facing the corridor. This is consistent with the provisions of Development Code Section 17.130.040.B in that no residential uses are permitted on the ground-floor frontage. Further, this Master Plan request is consistent with the General Plan in that existing industrial uses may remain and are permitted to expand with clean industrial uses (General Plan, Volume 2, Page 87)].

DEIR Section 4.1-1, Aesthetics, Table 4.1, Visual Impacts of Project Master Plan (added row), pages 4.1-15 to 4.1-17

Development Code Section/Provision	Development Code Standard	Project Master Plan (Code Exceptions)
<u>Signage</u>	<u>Per the RCMU:</u> <u>Wall Mounted:</u> <u>One sign per building face -</u> <u>Maximum of 2</u> <u>Sign Area: 150 sf per</u> <u>establishment</u> <u>Free Standing/Monument:</u> <u>1 sign per street frontage</u> <u>Maximum Area: 24 sf</u> <u>Maximum Height: up to 8' in</u> <u>height</u> <u>Maximum number: 1 per</u> <u>street frontage and may be</u> <u>increased to two per street</u> <u>frontage when signs are</u> <u>spaced a minimum of 300</u> <u>feet apart or alternatively, the</u> <u>maximum area may be</u> <u>increased to 48 sf when</u> <u>the sit frontage is longer than</u> <u>500 feet. These can not be</u> <u>combined.</u> <u>Commercial/mixed use/</u> <u>Industrial facilities are exempt</u> <u>from Table 17.74.080-1</u>	<u>Wall Mounted:</u> <u>· One Per Building Face -</u> <u>Maximum</u> <u>of 2 per street face</u> <u>Sign Area: 400 sf</u> <u>· Maximum Sign Copy</u> <u>Dimensions:</u> <u>Architectural Art Sign</u> <u>Installation: If 1 line of copy:</u> <u>A maximum of 10' high X 92'</u> <u>long per line with a maximum</u> <u>area of 1,650 sf per building</u> <u>façade.</u> <u>Standard Sign installation:</u> <u>If a single line of copy: 10'</u> <u>high 40'</u> <u>long per building façade</u> <u>If two lines of copy: 5' high X</u> <u>40' long per line per building</u> <u>façade.</u> <u>Free Standing/Monument:</u> <u>· Up to 8' in height</u> <u>· Sign Area: 36 square feet</u> <u>per sign face</u> <u>· Maximum number: 2 per</u> <u>street frontage with 300 feet</u> <u>apart</u> <u>Exterior Wayfinding:</u> <u>Including vehicular directional</u> <u>and pedestrian wayfinding</u> <u>signage.</u> <u>Freestanding Wayfinding</u> <u>Sign Height:</u> <u>Maximum of 14 feet</u> <u>Maximum sign area: 150 sq.ft</u> <u>of sign area (not including</u> <u>sign structure, pole, or</u> <u>architectural elements).</u>

DEIR Section 4.3, Air Quality

IMPORTANT NOTE: FEIR Appendix H completely replaces DEIR Appendix C and provides updated air quality, energy, and greenhouse gas emission modeling per SCAQMD recommended methodologies. The updated modeling is the result of comments on the DEIR by the California Air Resources Board (CARB) and the South Coast Air Quality Management District (SCAQMD)(see FEIR Section 2, Response to Comments, Letters B and F, respectively). All references to Appendix C in the DEIR sections, tables, etc. are replaced by reference to FEIR Appendix H.

DEIR Section 4.3.1, Air Quality, Environmental Setting, Local Environmental Setting

Page 4.3-10, Table 4.3.3 is revised as follows:

Table 4.3-3
2020-2022 2021 to 2024 Local Air Quality Data for Northwest San Bernardino Valley

Pollutant	Ambient Air Standard	Year			
		2021	2022	2023	2024
Ozone (O ₃) ^(A)					
Maximum 1-hour Concentration (ppm)		0.124	0.155	0.131	<u>0.138</u>
Maximum 8-hr Concentration (ppm)		0.100	0.100	0.111	<u>0.117</u>
Number of Days Exceeding State 1-hr Standard	>180 µg/m3	42	45	56	<u>63</u>
Number of Days Exceeding State 8-hr Standard	>137 µg/m3	81	69	77	<u>92</u>
Days Exceeding Federal 1-hr Standard	>0.124 ppm	0	1	2	<u>5</u>
Days Exceeding Federal 8-hr Standard	>0.070 ppm	78	67	74	<u>91</u>
Carbon Monoxide (CO)					
Maximum 1-hr Concentration (ppm)		1.3	1.1	1.0	<u>1.6</u>
Maximum 8-hr Concentration (ppm)		1.1	0.8	0.7	<u>1.1</u>
Days Exceeding State 1-hr Standard	>23,000 µg/m ³	0	0	0	<u>0</u>
Days Exceeding Federal/State 8-hr Standard	>10,000 µg/m ³	0	0	0	<u>0</u>
Days Exceeding Federal 1-hr Standard	>40,000 µg/m ³	0	0	0	<u>0</u>
Nitrogen Dioxide (NO ₂) ^(B)					
Maximum 1-hr Concentration (ppb)		64.6	53.3	63.2	<u>80.0</u>
Annual Arithmetic Mean Concentration (ppb)		14.8	15.3	16.6	<u>19.4</u>
Days Exceeding State 1-hr Standard	>180 µg/m ³	0	0	0	<u>0</u>
Suspended Particulate Matter (PM ₁₀) ^(C)					
Maximum 24-hr Concentration (µg/m ³)		123	144	132	<u>112</u>
Annual Arithmetic Mean (µg/m ³)		31.7	29.3	18.1	<u>37.0</u>
Samples Exceeding State 24-hr Standard	>50 µg/m ³	16	8	0	<u>48</u>
Samples Exceeding Federal 24-hr Standard	>150 µg/m ³	0	0	0	<u>0</u>
Fine Particulate Matter (PM _{2.5}) ^(D)					
Maximum 24-hr Concentration (µg/m ³)		65.4	41.8	50.9	<u>64.0</u>
Annual Arithmetic Mean (µg/m ³)		14.48	12.20	12.04	<u>13.74</u>
Samples Exceeding Federal 24-hr Standard	>35 µg/m ³	13	1	1	<u>10</u>

Source: SCAQMD²⁰

(A) O₃ data from 2023 was taken from Central San Bernardino Valley 1, as the data at the Northwest San Bernardino Valley site was based on a substantially smaller sample size (89 days of data) than previous years (359 days for 2021 and 364 days for 2022). Ozone data from 2023 for Central San Bernardino Valley 1 has 352 days of data.

(B) NO₂ data and was taken from Central San Bernardino Valley 1, as Northwest San Bernardino Valley did not have pollutant data for these time periods.

(C) PM₁₀ data from 2023 was based on a smaller sample size (90 days) than 2021 (358 days) and 2022 (360 days). However, this data is still presented as there are no nearby monitoring stations that have a larger data sample for PM₁₀ in 2023.

Table 4.3-3
2020-2022 2021 to 2024 Local Air Quality Data for Northwest San Bernardino Valley

Pollutant	Ambient Air Standard	Year			
		2021	2022	2023	2024
(D) PM _{2.5} data is from the “CA-60 Near Road” monitoring station in SRA 33.					

DEIR Section 4.3.1, Air Quality, Environmental Setting, Existing Health Risks and Disadvantaged Communities, CalEnviroScreen and Disadvantaged Communities (Senate Bill 535)

Page 4.3-11, last paragraph: CalEnviroScreen is a mapping tool that helps identify California communities that are most affected by many sources of pollution, and where people are often especially vulnerable to pollution's effects. Initially released in 2013, CalEnviroScreen has been updated since then, with CalEnviroScreen Version 3.0 released in 2017, and the most recent Version 4.0 released in 2021. CalEnviroScreen 4.0 incorporated new data sources and made improvements on methodology to more accurately reflect environmental conditions and vulnerability.⁵² While CalEnviroScreen . .

Page 4.3-13, first paragraph: This total / cumulative score helps contextualize how multiple contaminants from multiple sources affect people, while taking into account their living conditions (e.g., nonchemical factors such as socioeconomic and health status). ~~Communities that are within the top 25th percentile for total CalEnviroScreen scores are considered disadvantaged communities pursuant to SB 535.~~^{25,26} as described above. Table 4.3-4 summarizes the CalEnviroScreen indicators for census tract 6071002110. The CalEnviroScreen census tract percentiles are a main factor in whether an area is considered a disadvantaged community pursuant to SB 535. In May 2022, CalEPA designated areas that met any of the following four metrics as disadvantaged communities:

1. Census tracts receiving the highest 25 percent of overall scores in CalEnviroScreen 4.0
2. Census tracts lacking overall scores in CalEnviroScreen 4.0 due to data gaps, but receiving the highest 5 percent of CalEnviroScreen 4.0 cumulative pollution burden scores
3. Census tracts identified in the 2017 DAC designation under CalEnviroScreen 3.0, regardless of their scores in CalEnviroScreen 4.0
4. Lands under the control of federally recognized Tribes^{25,26}

Table 4.3-4 summarizes the CalEnviroScreen 4.0 indicators for census tract 6071002110.

Page 4.3-13, Table 4.3-4 title: CalEnviroScreen Version 4.0 Health Risk Information

Page 4.3-14, Table 4.3-4 (next to last row):

SB 535 Disadvantaged Community?	No
--	-----------

Page 4.3-13, last paragraph: As shown in Table 4.3-4, census tract 6071002110 is within the top 30% of total CalEnviroScreen percentiles throughout the State under CalEnviroScreen Version 4.0. It is substantially burdened by exposure to pollution and is subject to relatively high levels of underlying conditions. According to the Office of Environmental Health Hazard Assessment

(OEHHA) CalEnviroScreen 4.0 Map, the proposed Project is Census Tract 6071002110. This area shows an average pollution indicator percentile of 88% based on the CalEnviroScreen indicators (e.g., exposure, environmental effects, population characteristics, socioeconomic factors) and has a population of approximately 7,096 people.¹²⁸ This census tract ranks one of the highest for ozone and PM_{2.5} indicators, with percentiles of 95 and 96, respectively. The census tract's total CalEnviroScreen percentile is 74. ~~Since this census tract is not within the top 25% in scoring, according to the CalEnviroScreen methodology, it is not considered a disadvantaged community pursuant to SB 535.~~

Under the previous version of CalEnviroScreen, CalEnviroScreen Version 3.0, Census Tract 6071002110 had a Pollution Burden Percentile of 98 and a Population Characteristics Percentile of 82, and a CalEnviroScreen 3.0 Percentile score of 95-100%, which is within the percentile range (i.e., top 25%) for designation as a disadvantaged community. Under the improvements to data and methodology from the updated CalEnviroScreen Version 4.0, as well as potential improvements in conditions as a result of the programs and funding from SB 535, the census tract is not considered a disadvantaged community under the most recent version of CalEnviroScreen. The CalEnviroScreen Version 4.0 is considered an accurate reflection of the pollution exposures and population vulnerabilities that communities face. However, as discussed above, if a census tract was designated as a disadvantaged community under CalEnviroScreen Version 3.0, it is still considered a disadvantaged community pursuant to SB 535 for reasons such as continued funding and program consistency.⁵² In addition, the census tracts to the east and west of the Project's census tract are designated disadvantaged communities for the same reasoning.

DEIR Section 4.3.2 Air Quality, Regulatory Framework, Regional Air Quality Regulation, SCAQMD Rule Book

Page 4.3-21 to Page 4.3-24, the following rule descriptions are added to the discussion of the SCAQMD Rulebook:

- Rule 201 (Permit to Construct) sets forth that no person shall build, erect, install, alter, or replace any equipment which may cause the issuance of air contaminants or the use of equipment that may reduce or control the issuance of air contaminants, without first obtaining written authorization for such construction from the Executive Officer of the SCAQMD.
- Rule 1166 (Volatile Organic Compound Emissions from Decontamination of Soil) sets forth requirements to control emissions of VOCs from excavating, grading, handling, and treatment of VOC contaminated soil as a result of leakage from storage or transfer operations, accidental spillage, or other deposition.
- Rule 1466 (Control of Particulate Emissions from Soils with Toxic Air Contaminants) sets forth requirements to minimize fugitive dust emissions containing TACs during earth moving activities at sites specifically designated hazardous materials release site.
- Rule 1470 (Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines) applies to sellers, owners, and operators of stationary compression ignition engines win the SCAQMD with a rates brake horsepower greater than 50 hp. The rule requires use of CARB-certified diesel fuel, equipment that meets specific emissions rates, and other operating requirements.

DEIR Section 4.3.3 Air Quality, Significance Thresholds, Localized Emissions Thresholds

Page 4.3-29 to 4.3-30, the discussion of Localized Emissions Thresholds is revised as follows:

Localized Emissions Thresholds

The SCAQMD's localized air quality impact guidance and corresponding localized significance thresholds (LSTs) were developed to assist CEQA lead agencies with the analysis of a project's potential local air quality impacts.⁴²⁵⁵ The guidance and thresholds are based on SCAQMD air quality dispersion modeling that considers local meteorological and air quality data in specific areas, called Source Receptor Areas, or SRAs, and estimates the amount of air pollution that may result in a local air quality impact. The SCAQMD LSTs "represent "the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard."⁴²⁵⁵ Unlike the regional emission significance thresholds, LSTs have only been developed for NO_x, CO, PM₁₀ and PM_{2.5}. ~~The SCAQMD's modeling of potential local air pollution impacts is based on specific project sizes (e.g., 1 acre, 2 acres, 5 acres) at specific distances from a project area (25 meters, 50 meters, 100 meters, 200 meters, and 500 meters). This approach allows for pollutants to disperse from their source according to SRA-specific conditions and distances to actual sensitive receptors locations. When an affected receptor is located at a different or unique distance than that modeled by the SCAQMD, the LST methodology permits a project-specific LST to be developed using linear interpolation.~~

~~This EIR compares the Project's construction and operational emissions against the SCAQMD's LST mass rate screening values for a five-acre project located in SRA 33, Southwest San Bernardino Valley, the SRA in which the Project is located. The SCAQMD's LSTs for this SRA and Project size are shown Table 4.3-10. It is noted Table 4.3-10 includes LSTs based on the SCAQMD screening table, as well as one LST developed for the project using linear interpolation.~~

Table 4.3-10								
SCAQMD Localized Significance Thresholds for Source Receptor Area 33								
Distance from Site Boundary to Receptor	Construction LST Thresholds (Maximum Pounds Per Day)				Operational LST Thresholds (Maximum Pounds Per Day)			
	NO_x	CO	PM₁₀	PM_{2.5}	NO_x	CO	PM₁₀	PM_{2.5}
5-ACRE SITE								
82 Feet (25 Meters)	270	2,193	16	9	270	2,193	4	2
164 Feet (50 Meters)	303	2,972	50	12	303	2,978	12	3
328 Feet (100 Meters)	378	5,118	80	21	378	5,118	20	5
656 Feet (200 Meters)	486	9,611	140	45	486	9,611	34	11
1,430 Feet (435 Meters) ^(A)	717	24,970	283	141	717	24,970	68	38
1,640 Feet (500 Meters)	778	29,410	322	170	778	29,410	78	41
Source: SCAQMD ⁴² and MIG (see Appendix C1.2 and C1.3)								
(A) LST developed using linear interpolation.								

When a project involves construction or operation on more than five acres, the SCAQMD's LST methodology document recommends a lead agency conduct project-specific dispersion modeling and compare the modeling results to concentration-based LST standards. Thus, because the proposed Project is more than five acres in size, this EIR compares the Project's on-site

construction and operational emissions against the SCAQMD's LST concentration thresholds, which vary by pollutant. For CO and NO₂ the LST significance thresholds for both construction and operation are based on the difference between the most stringent state or federal ambient air quality standard and the maximum concentration measured over the most-recent three-year period (2021 to 2023, see Table 4.3-3). The resulting values represent the allowable increase in NO₂ and CO ambient concentrations above current levels that could occur in SRA 33 without causing or contributing to exceedances of the CAAQS or NAAQS. For PM₁₀ and PM_{2.5}, the construction threshold is a 24-hour average concentration of 10.4 µg/m³, based on compliance with Rule 403, while the operational threshold is 2.5 µg/m³, based on SCAQMD Rule 1303. The PM₁₀ and PM_{2.5} thresholds are intended to constrain emissions so as to not cause or contribute to an exceedance of the CAAQS or NAAQS. Table 4.3-10 summarizes the LST thresholds used to determine the significance of the Project's potential local air quality impacts.

Table 4.3-10
SCAQMD Localized Significance Thresholds for Source Receptor Area 33

Activity / Pollutant	Averaging Period^(A)	Most Stringent Ambient Air Quality Standard^{(A),(B)}	2022 – 2024 Peak Concentration^(B)	LST Threshold
Construction				
NO ₂	1 Hour	0.18 ppm	0.08 ppm	0.10 ppm
CO	1 Hour	20 ppm	1.6 ppm	18.4 ppm
CO	8 Hours	9.0 ppm	1.1 ppm	7.9 ppm
PM ₁₀	24 Hours	50 µg/m ³	=	10.4 µg/m ³
PM _{2.5}	24 Hours	35 µg/m ³	=	10.4 µg/m ³
Operation				
NO ₂	1 Hour	0.18 ppm	0.08 ppm	0.10 ppm
CO	1 Hour	20 ppm	1.6 ppm	18.4 ppm
CO	8 Hours	9.0 ppm	1.1 ppm	7.9 ppm
PM ₁₀	24 Hours	50 µg/m ³	=	2.5 µg/m ³
PM _{2.5}	24 Hours	35 µg/m ³	=	2.5 µg/m ³
Source: SCAQMD ⁵⁶				
(A) See Table 4.3-2.				
(B) See Table 4.3-3.				

DEIR Section 4.3.4 Air Quality, Emissions Modeling Methodology, Criteria Air Pollutants

Page 4.3-33, 2nd bullet point discussion is revised as follows:

- Demolition and Hauling: The default demolition and hauling assumptions were modified as follows:
 - Phase 1: Construction of the main facilities was assumed to result in the demolition of 175,685 square feet of existing building space and require up to 122,000 cubic yards of soil import. In addition, the construction of the CVWD groundwater well

was assumed to result in the removal of 3,965 cubic yards of debris and soil hauling.

- Phase 2B: Construction activities would result in the demolition of 62,210 square feet of building space and require up to 16,200 cubic yards of soil import.
- All haul trucks were assumed to travel a one-way trip distance of 28 miles to approximate the distance to the San Timoteo Landfill in Redlands, which would be the farthest landfill that may receive construction waste from the Project.

Page 4.3-33 to 4.3-34, the last bullet point discussion (starting on page 4.3-33) is revised as follows:

- Mobile Sources:
 - Trip Generation Rates: The default weekday and weekend trip generation rates for the existing land use types (e.g., office, warehouse) were replaced with the actual trip generation rates derived from site-specific traffic counts conducted for the Project. As shown in Table 4.3-13, the proposed Project would generate approximately 1,930 total gross daily passenger vehicle trips and approximately 1,300 total gross daily truck trips, for a total gross trip generation of approximately 3,230 daily trips. The Project's net increase in trips above existing conditions would be equal to 1,114 passenger vehicle trips, 1,003 truck trips, and 2,115 total daily trips. The applicant estimates that up to two truck deliveries per month could include the use of a transportation refrigeration unit (TRU). For modeling . . .

Page 4.3-37, last bullet point discussion is revised as follows:

- Pentair CO₂ recovery system: The exhaust from the SCR system would be directed to a CO₂ recovery system that will clean and purify the CO₂ in the SCR system exhaust stream, producing beverage-grade CO₂ for use in the beverage manufacturing process. The recovery system would first cool the SCR system exhaust gases and remove sulfur compounds. The scrubbed and cool exhaust stream would then go to an adsorption unit that would inject monoethanolamine (MEA) into the exhaust stream to chemically capture CO₂, creating an MEA solution. The MEA solution would then be heated to release the CO₂ from the solution as a gas. The CO₂-rich gas would then be cooled, and any remaining MEA removed from the gas stream. The CO₂ gas would then be compressed and dehydrated to remove water and passed through an activated carbon filter to remove any impurities. Finally, the CO₂ gas would pass through a reboiler to remove any remaining non-condensable gases, condensed into a liquid, distilled, and stored in an insulated storage tank. Refer to Appendix I for a detailed process description of the Pentair CO₂ recovery system. The system includes 2 approximately 11-foot-diameter exhaust gas recovery towers that could range between 65 and 85 feet in height. These towers would emit nitrogen, oxygen, and a small amount of ammonia, estimated at up to 3 pounds per day. The ammonia is associated with the treatment of water used in the gas cooling and condensation steps of CO₂ recovery. The CO₂ recovery system is estimated have a CO₂ recovery efficiency between 80% to 90% and could recover between approximately 9,362 metric tons and 11,364 metric tons of CO₂ per year from the cogeneration/SCR system exhaust stream.

Page 4.3-38, first bullet point discussion is revised as follows

- Backup Generator Diesel Fuel: The proposed Project's two (2) 2,011-horsepower emergency diesel engine-generator sets would be tested monthly and could each consume up to 50,800 gallons of diesel fuel annually during testing and non-potential emergency use. Diesel fuel use for the backup generators was estimated using manufacturer's specifications for total fuel flow (254 gallons per hour) and the total anticipated non-emergency runtime (50 hours) maximum operational hours per year, including for emergency use, typically permitted by the SCAQMD (200 hours).^{XI}.

Page 4.3-38, footnote XI is deleted:

~~XI Fuel use for emergency operations cannot be quantified because emergency runtime is speculative.~~

DEIR Section 4.3.4 Air Quality, Emissions Modeling Methodology, Toxic Air Contaminants

Page 4.3-38, 2nd bullet point discussion is revised as follows:

- Operational DPM. Once operational, most of the trucks that would access the Project site and loading docks would be diesel fueled and thus generate DPM emissions. In addition, approximately 2 trucks per month would deliver cold dry ingredients to the Project site. Each of these trucks would operate an auxiliary diesel-fueled TRU assumed to be 33 horsepower. Each TRU would operate for up to 2 hours on-site. Finally, In addition, the proposed emergency back-up generator would consist of 2, 2,011 horsepower diesel-fueled engines located slightly north of the northeast corner of the PC/DC facility.

Page 4.3-39, the following discussion is added to the Operational DPM Emissions section:

- On-Site TRUs: On-site TRU emissions of DPM were estimated using project-specific information about TRU operations and CARB's load factor and emission factor data for criteria pollutants.⁵⁶ The calculations assumed that up to 2 trucks with TRUs would access the site per month (24 per year), with a maximum of one (1) TRU per day. Due to the limited cold storage space included in the Project (1,000 square feet), each TRU was assumed to operate onsite for approximately two (2) hours per trip. The TRUs were assumed to be 33 horsepower in size and meet Tier 2 emissions standards. The emission factors, in grams per brake horsepower hour, were multiplied by the onsite operational time (i.e., 2 hours for maximum daily emissions). All PM₁₀ emissions were conservatively assumed to be DPM emissions.

DEIR Section 4.3.4 Air Quality, Emissions Modeling Methodology, Health Risk Assessment

Page 4.3-41, the Receptor and Meteorology bullet point discussions are revised as follows:

- Receptors: ~~Four~~Five separate receptor grids were developed to predict ground level pollutant concentrations at sensitive receptor locations within approximately one-quarter mile surrounding the Project area boundary, as follows:

- A 1,960-meter by 1,960-meter grid with a receptor spacing of 280 meters was generated over the industrial, commercial, residential, and preschool land uses surrounding the Project site, covering the entire modeling domain. The grid's central coordinates were 447053.68 meters Easting and 3771888.79 meters Northing. This grid was then converted to discrete Cartesian receptors (yielding 64 discrete receptors).
- A 1,200-meter by 1,200-meter grid with a receptor spacing of 100 meters was generated over the industrial, commercial, residential, and preschool land uses surrounding the Project site. The grid's central coordinates were 447245.00 meters Easting and 37771917.00 meters Northing. This grid was then converted to discrete Cartesian receptors (yielding 169 discrete receptors).
- A 150-meter by 100-meter grid with a receptor spacing of 25 meters along was generated over the industrial land use east of the Project site. The grid's central coordinates were 447335.00 meters Easting and 3771950.00 meters Northing. This grid was then converted to discrete Cartesian receptors (yielding 35 discrete receptors).
- A 120-meter by 120-meter grid with a receptor spacing of 15 meters along was generated over commercial / strip mall east of the site that includes the Good Stewards Daycare. The grid's central coordinates were 447357.00 meters Easting and 3771785.00 meters Northing. This grid was then converted to discrete Cartesian receptors (yielding 81 discrete receptors).
- A 120-meter by 120-meter grid with a receptor spacing of 15 meters was generated over the residential area southeast of the Project site, on the southeastern corner of 6th Street and Cleveland Avenue. The grid's central coordinates were 447750.00 meters Easting and 3771605.00 meters Northing. This grid was then converted to discrete Cartesian receptors (yielding 81 discrete receptors).

Additionally, two discrete receptors were added, with one located at 446049.67 meters Easting and 3772728.91 meters Northing and the other located at 446841.99 meters Easting and 3771781.53 meters Northing. All receptors within the Project site (14 receptors) were removed, yielding a total of 352418 discrete receptors modeled for the Project.

- Meteorology: AERMOD-ready meteorological data for the Ontario International Airport meteorological station (Version 11) was obtained from the SCAQMD for the five-year period January 1, 2019 to December 31, 2023~~January 1, 2012, to December 31, 2016~~ (see Exhibit 4.3-1 and **Error! Reference source not found.**) ~~Error! Reference source not found.~~ *[print copy]*

DEIR Section 4.3.4 Air Quality, Emissions Modeling Methodology, Localized Significance Threshold Dispersion Modeling

Page 4.3-50, the following discussion is added to EIR:

Localized Significance Threshold (LST) Dispersion Modeling

MIG evaluated the potential construction and operational LST impacts of the Project using the U.S. EPA's AERMOD dispersion model (Version 23132) and the SCAQMD's LST threshold methodology document.⁵⁵ The dispersion modeling was used to predict ground level concentrations of LST pollutants, including 1-hour NO₂ and CO s, 8-hour CO, and 24-hour PM₁₀ and PM_{2.5} concentrations from all modeled fugitive dust and exhaust sources. Fugitive dust sources were modeled as series of ground-based area sources with an initial vertical dimension of 1 meter. Otherwise, the modeling conducted for all other on-site LST emissions sources used the same source treatment, terrain, meteorology, and other dispersion characteristics described in the "Health Risk Assessment" section above. The modeling was conducted using a uniform emission rate of 1 gram per second or 1 gram per second per square meter. The modeled outputs were then scaled using each individual sources maximum hourly, 8-hour, and 24-hour emission rate. It is noted that maximum daily NO_x, CO, and PM₁₀ and PM_{2.5} emissions occurred during different overlapping phases of construction. The resultant pollutant concentration predictions were then compared to concentration-based thresholds per the SCAQMD's LST methodology document (see Section 4.3.3). The conversion of NO_x to NO₂ by distance from source was made in accordance with SCAQMD LST methodology guidance.

DEIR Section 4.3.5 Air Quality, Impacts and Mitigation Measures, Cumulative Considerable Net Increase in Nonattainment Criteria Air Pollutants (Impact AIR-2)

Page 4.3-52, Table 4.3-19 is revised as follows:

Table 4.3-19
Unmitigated Project Construction - Phase 1 Regional Emissions Estimates

Season	Maximum Daily Emissions (Pounds per Day)					
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Summer 2024	16.2	~~116.1~~ 119.7	~~206.0~~ 207.8	~~0.3~~ 0.4	~~29.0~~ 30.0	~~10.1~~ 10.4
Winter 2024	10.7	~~103.5~~ 108.1	129.5	0.3	21.9	6.6
Summer 2025	108.2	115.1	239.8	0.3	36.4	12.9
Winter 2025	14.7	100.4	171.0	0.3	29.2	10.9
SCAQMD CEQA Threshold	75	100	550	150	150	55
Threshold Exceeded?	Yes	Yes	No	No	No	No

Source: MIG (see Appendix C1.2)

Page 4.3-54, Table 4.3-21 and 4.3-22 are revised as follows:

Table 4.3-21
Mitigated Project Construction – Phase 1 Regional Emissions Estimates

Season	Maximum Daily Emissions (lbs/day)					
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Summer 2024	9.8	~~49.2~~ <u>52.7</u>	~~230.3~~ 232.1	~~0.3~~ <u>0.4</u>	~~26.1~~ <u>27.1</u>	~~7.4~~ <u>7.7</u>
Winter 2024	7.9	34.3	136.7	0.3	20.6	5.4
Summer 2025	35.2	48.6	248.4	0.3	~~33.3~~ <u>33.4</u>	10.2
Winter 2025	9.5	42.9	177.9	0.3	27.4	8.4
SCAQMD CEQA Threshold	75	100	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No

Source: MIG (see Appendix C1.2)

Table 4.3-22
Mitigated Project Construction – Phase 2B Regional Emissions Estimates

Season	Maximum Daily Emissions (lbs/day)					
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Winter 2026	2.3	~~46.7~~ <u>19.5</u>	54.3	0.1	22.8	11.0
Summer 2026	2.4	11.8	55.9	0.1	5.7	1.6
Winter 2027	20.3	5.8	24.4	<0.1	2.8	0.8
SCAQMD CEQA Threshold	75	100	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No

Source: MIG (see Appendix C1.2)

Page 4.3-55, Table 4.3-23 and Table 4.3-24 are revised as follows:

Table 4.3-23
Unmitigated Project Operation – Phase 1 Regional Emissions Estimates

Scenario and Source	Maximum Daily Pollutant Emissions (Pounds Per Day) ^(A)					
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Project Phase 1 Emissions						
Mobile	10.0	183.1	185.0	1.6	66.5	19.4
Area	24.2	0.4	46.0	<0.1	0.1	0.1
Energy	0.3	6.1	5.1	<0.1	0.5	0.5
Stationary (Tray Shrink Packers)	0.1	1.0	0.3	<0.1	0.1	0.1
Stationary (Boilers)	2.1	3.4	6.7	0.4	4.5	4.5
Stationary (Emergency Generators)	2.1	21.5	2.8	--	0.4	0.4
Transport Refrigeration Units (TRUs)	<0.1	0.3	--	--	<0.1	--
<i>Project Subtotal^(B)</i>	38.8	~~215.6~~ 215.8	245.8	2.0	72.0	24.9
Existing Site Emissions ^(C)	12.4	48.3	79.7	0.4	19.3	5.6
Total Net Change^(B)	26.4	~~167.3~~ 167.5	166.1	1.6	52.7	19.3
SCAQMD CEQA Threshold	55	55	550	150	150	55
Threshold Exceeded?	No	Yes	No	No	No	No
Source: MIG (see Appendix C1.1, C1.3, and C2, Sheet 01, Table C2-01.1)						
(A) Maximum daily VOC, CO, SO _x , PM ₁₀ , and PM _{2.5} emissions occur during the summer. Maximum daily NO _x emissions occur during the winter.						
(B) Totals may not equal due to rounding.						
(C) See Table 4.3-7.						

Table 4.3-24
Unmitigated Project Operation – Phase 2 Regional Emissions Estimates

Scenario and Source	Maximum Daily Pollutant Emissions (Pounds Per Day) ^(A)					
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Project Phase 2 Emissions						
Mobile	9.6	175.7	177.1	1.6	67.2	19.6
Area	24.2	0.4	46.0	<0.1	0.1	0.1
Energy	0.3	6.1	5.1	<0.1	0.5	0.5
Stationary - Tray Shrink Packers	0.1	1.0	0.3	<0.1	0.1	0.1
Stationary - Boilers	4.3	6.9	13.3	0.7	8.9	8.9
Stationary - Cogeneration	7.4	5.2	14.8	0.4	6.7	6.7
Stationary - Emergency Generators	2.1	21.5	2.8	--	0.4	0.4
Transport Refrigeration Units (TRUs)	<0.1	0.3	--	--	<0.1	--
<i>Project Subtotal^(B)</i>	48.0	~~216.8~~ 217.1	259.4	2.7	83.8	36.1
Existing Site Emissions ^(C)	12.4	48.3	79.7	0.4	19.3	5.6
Total Net Change^(B)	35.6	~~168.5~~ 168.8	179.7	2.3	64.5	30.5
SCAQMD CEQA Threshold	55	55	550	150	150	55
Threshold Exceeded?	No	Yes	No	No	No	No
Source: MIG (see Appendix C1.1, C1.3, and C2, Sheet 01, Table C2-01.2)						

Table 4.3-24
Unmitigated Project Operation – Phase 2 Regional Emissions Estimates

Scenario and Source	Maximum Daily Pollutant Emissions (Pounds Per Day) ^(A)					
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
(A) Maximum daily VOC, CO, SO _x , PM ₁₀ , and PM _{2.5} emissions occur during the summer. Maximum daily NO _x emissions occur during the winter.						
(B) Totals may not equal due to rounding.						
(C) See Table 4.3-7.						

Page 4.3-58, the following new bullet discussion is added before the first full paragraph on:

- Mitigation Measure AIR-2F would require the Project to provide 3rd party trucking vendors information on the Hybrid and Zero Emission Truck and Bus Voucher Incentive Project (HVIP), which provides point-of-sale vouchers for zero emission vehicles, including trucks. By making zero emission vehicle technologies more affordable, the program serves to accelerate their deployment; however, no emissions reduction credit is applied to the Project for this measure because information sharing alone would not guarantee emissions reductions occur.

Page 4.3-58, third paragraph and Table 4.3-25 are revised as follows:

The Project's maximum daily mitigated Phase 1 and Phase 2 regional NO_x emissions from mobile and energy sources are summarized in Table 4.3-25.

Table 4.3-25
Mitigated Project Operations – Phase 1 and 2 Regional NO_x Emissions

Scenario	Total Mitigated Operational NO _x Emissions (Pounds Per Day)	
	Phase 1	Phase 2
Project Maximum Operational NO _x Emissions (Unmitigated)	~~189.2~~ <u>215.8</u>	~~181.8~~ <u>217.1</u>
Mitigation Measure AIR-2C, AIR-2D, and AIR-2E Emissions Reductions	~~6.0~~ <u>6.3</u>	~~6.0~~ <u>6.3</u>
Mitigation Measure GHG-1 and GHG-2 Emissions Reductions	<0.1	<0.1
Subtotal, Mitigation	~~6.0~~ <u>6.3</u>	~~6.0~~ <u>6.3</u>
Project Maximum Operational NO _x Emissions (Mitigated)	~~183.2~~ <u>209.5</u>	~~175.8~~ <u>210.8</u>
Existing Site Emissions	48.3	48.3
Total Net Change ^(A)	~~134.9~~ <u>161.2</u>	~~127.6~~ <u>162.5</u>
SCAQMD Threshold	55	55
SCAQMD Threshold Exceeded?	Yes	Yes
Source: MIG (see Appendix C1 and C2)		
(A) Totals may not equal due to rounding.		

Page 4.3-59, Table 4.3-26 is revised as follows:

Table 4.3-26
Unmitigated Combined Phase 1 Operational and Phase 2B Construction Regional Emissions Estimates

Source	Maximum Daily Pollutant Emissions (Pounds Per Day) ^(A)					
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Phase 1 Operational Emissions (2026)						
Winter 2026	26.5	189.2	173.1	1.6	67.7	20.4
	<u>30.8</u>	<u>215.8</u>	<u>204.3</u>	<u>2.0</u>	<u>72.6</u>	<u>25.0</u>
Summer 2026	34.5	181.6	236.1	1.6	67.8	20.4
	<u>38.9</u>	<u>208.2</u>	<u>267.3</u>	<u>2.0</u>	<u>72.7</u>	<u>25.1</u>
Phase 2 Operational Emissions (2027)						
Winter 2027	26.1	181.8	166.1	1.6	67.7	20.0
	<u>40.0</u>	<u>217.1</u>	<u>197.3</u>	<u>2.7</u>	<u>83.8</u>	<u>36.1</u>
Phase 2B Construction Emissions						
Winter 2026	5.0	42.0	52.8	0.1	24.2	12.3
Summer 2026	3.6	25.2	51.9	0.1	6.2	2.1
Winter 2027	93.0	12.1	22.4	<0.1	3.1	1.0
Combined Operational and Phase 2B Construction Emissions						
Winter 2026	31.5	231.2	225.9	1.7	91.9	32.4
	<u>35.8</u>	<u>257.8</u>	<u>257.1</u>	<u>2.1</u>	<u>96.8</u>	<u>37.3</u>
Summer 2026	38.1	206.8	288.0	1.7	74.0	22.2
	<u>42.5</u>	<u>233.4</u>	<u>319.2</u>	<u>2.1</u>	<u>78.9</u>	<u>27.1</u>
Winter 2027	119.1	193.9	188.5	1.6	70.8	21.0
	<u>133.0</u>	<u>229.2</u>	<u>219.7</u>	<u>2.7</u>	<u>86.8</u>	<u>37.1</u>
Existing Site Emissions (2024)						
Summer	12.4	46.3	79.7	0.4	19.3	5.6
Winter	10.3	48.3	59.6	0.4	19.3	5.6
Total Net Change						
Winter 2026	21.2	182.9	166.3	1.3	72.6	26.8
	<u>25.6</u>	<u>209.5</u>	<u>197.5</u>	<u>1.7</u>	<u>77.5</u>	<u>31.7</u>
Summer 2026	25.7	160.5	208.3	1.3	54.7	16.6
	<u>30.1</u>	<u>187.1</u>	<u>239.5</u>	<u>1.7</u>	<u>59.6</u>	<u>21.5</u>
Winter 2027	108.9	145.6	128.9	1.2	51.4	15.4
	<u>122.8</u>	<u>180.9</u>	<u>160.1</u>	<u>2.3</u>	<u>67.5</u>	<u>31.5</u>
SCAQMD CEQA Threshold	55	55	550	150	150	55
Threshold Exceeded?	Yes	Yes	No	No	No	No
Source: Appendix C and SCAQMD ⁴¹						
(A) Maximum daily VOC, CO, SO _x , PM ₁₀ , and PM _{2.5} emissions occur during the summer. Maximum daily NO _x emissions occur during the winter.						
(B) Totals may not equal due to rounding.						

Page 4.3-60, Table 4.3-27 is revised as follows:

Table 4.3-27
Mitigated Combined Phase 1 Operational and Phase 2B Construction Regional Emissions Estimates

Source	Maximum Daily Pollutant Emissions (Pounds Per Day) ^(A)					
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Phase 1 Operational Emissions (2026)						
Winter	26.2	189.0	170.5	1.6	67.0	19.9
	<u>30.6</u>	<u>209.5</u>	<u>201.7</u>	<u>2.0</u>	<u>71.9</u>	<u>24.8</u>
Summer	34.2	181.4	232.9	1.6	67.1	19.9
	<u>38.6</u>	<u>201.9</u>	<u>264.1</u>	<u>2.0</u>	<u>72.0</u>	<u>24.9</u>
Phase 2 Operational Emissions (2027)						
Winter 2027	25.9	181.6	163.6	1.6	67.0	19.9
	<u>39.8</u>	<u>210.8</u>	<u>194.8</u>	<u>2.7</u>	<u>83.1</u>	<u>35.9</u>
Phase 2B Construction Emissions						
Winter 2026	2.3	<u>16.7</u> <u>19.5</u>	54.3	0.1	22.8	11.0
Summer 2026	2.4	11.8	55.9	0.1	5.7	1.6
Winter 2027	20.3	5.8	24.4	<0.1	<0.1	<0.1
Combined Operational and Phase 2B Construction Emissions						
Winter 2026	28.5	205.7	224.8	1.7	89.8	30.9
	<u>32.9</u>	<u>229.0</u>	<u>256.0</u>	<u>2.1</u>	<u>94.7</u>	<u>35.8</u>
Summer 2026	36.6	193.2	288.8	1.7	72.8	21.5
	<u>41.0</u>	<u>213.7</u>	<u>320.0</u>	<u>2.1</u>	<u>77.7</u>	<u>26.4</u>
Winter 2027	46.2	187.4	188.0	1.6	67.0	19.9
	<u>60.1</u>	<u>216.7</u>	<u>219.2</u>	<u>2.7</u>	<u>83.1</u>	<u>35.9</u>
Existing Site Emissions (2024)						
Summer	12.4	46.3	79.7	0.4	19.3	5.6
Winter	10.3	48.3	59.6	0.4	19.3	5.6
Total Net Change						
Winter 2026	18.3	157.4	165.2	1.3	70.5	25.3
	<u>22.7</u>	<u>180.7</u>	<u>196.4</u>	<u>1.7</u>	<u>75.4</u>	<u>30.2</u>
Summer 2026	24.3	146.9	209.1	1.3	53.4	15.9
	<u>28.6</u>	<u>167.4</u>	<u>240.3</u>	<u>1.6</u>	<u>58.4</u>	<u>20.8</u>
Winter 2027	35.9	139.2	128.4	1.2	47.7	14.3
	<u>49.8</u>	<u>168.4</u>	<u>159.6</u>	<u>2.3</u>	<u>63.8</u>	<u>30.3</u>
SCAQMD CEQA Threshold	55	55	550	150	150	55
Threshold Exceeded?	No	Yes	No	No	No	No

Source: Appendix C and SCAQMD⁴¹

(A) Maximum daily VOC, CO, SO_x, PM₁₀, and PM_{2.5} emissions occur during the summer. Maximum daily NO_x emissions occur during the winter.

(B) Totals may not equal due to rounding.

On page 4.3-64, Mitigation Measure AIR-2E is revised as follows:

Mitigation Measure AIR-2E: Reduce Truck Trip Emissions.

1) Exceed the mandatory electric vehicle (EV) charging readiness requirements...

- a) Design and include sufficient space for the transformer, main service equipment, and cabinets/subpanels necessary to accommodate a sufficient number of branch circuits to provide future installation of electric vehicle service equipment (EVSE) to service all onsite electric trucks.
- b) Design and incorporate a sufficient number of raceways/busways to provide future EVSE installation to service all onsite electric trucks.
- c) Dedicate/preserve convenient locations and reserve pathways for conduits needed to connect the EVSE to other electrical service equipment (e.g., raceway, cabinet, etc.) to service all onsite electric trucks.
- d) Install EVSE onsite equal to at least 10% of the total truck docks included in the final Project design. Based on the project's estimated total number of truck docks (57, see subsection a) above), the number of onsite EVSE for the project equals six (6).

2) Transport Refrigeration Unit (TRU) Restrictions: The applicant shall ~~limit prohibit~~ the use of diesel fueled TRUs on-site. All TRUs operated at the site shall be ~~either~~ powered by electricity ~~or limited to no more than two TRU trucks per month operating onsite, unless such electrical service is unavailable due to power outages or electric infrastructure servicing/maintenance requirements.~~

3) Idling Signage: Signs shall be posted at all truck access gates and loading dock areas reminding drivers of idling limitations. The signs shall be clearly visible, readable at a distance of 10 feet, and notify truck drivers that:

- a) The vehicle's primary diesel engine shall be turned off when not in use.
- b) The vehicle's primary diesel engine shall not idle for more than 5 consecutive minutes at any location pursuant to Title 13 of the California Code of Regulations, Section 2485.

4) EV Fleet Vehicles: In addition to EV charging readiness infrastructure measures, the applicant shall incorporate, and use for distribution, at least 8 zero emission, or near zero emission, on-road haul trucks in its proprietary vehicle fleet within the first year of operations after receiving a certificate of occupancy.

5) Incentive Funding: To support the accelerated deployment of zero emission (ZE) and near zero emission (NZE) truck technologies, the City shall require the applicant to provide operators of third-party diesel-fueled trucks accessing the site information on the California Air Resources Board's Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project (HVIP), such as the HVIP website or handouts summarizing HVIP details, frequently asked questions, etc.

On page 4.3-64, Mitigation Measure AIR-2F is added as follows:

Mitigation Measure AIR-2F: Reduce Service Equipment Emissions. To reduce service equipment emissions (i.e., yard hostlers, yard equipment, forklifts, and pallet jacks) and promote the use of near-zero emission, and zero emission equipment, the City shall require the applicant

to utilize 100% electric or similar near-zero and zero emission, forklifts, sweeper/scrubbers, aerial lifts, and yard trucks within the first operational year of the project, and continuing thereafter.

DEIR Section 4.3.5 Air Quality, Impacts and Mitigation Measures, Expose Sensitive Receptors to Substantial Pollutant Concentrations (Impact AIR-3)

Page 4.3-64, last paragraph:

- Localized Significance Threshold (LST) Analysis: As described in Section 4.3.3, this EIR compares the Project's construction and operational emissions against concentration-based thresholds derived using the SCAQMD's LST methodology for CO, NO₂, PM₁₀, and PM_{2.5}.~~mass rate screening values for a five-acre project located in SRA 33.~~^{xxiv} LST impacts for PM₁₀ and PM_{2.5} are assessed for sensitive receptors that could remain in a fixed location for up to 24 hours, since the most stringent PM standards are based on 24-hour averaging times (see Table 4.3-2 for a list of air quality standards and averaging periods). The nearest off-site receptors that could remain in place for up to 24 hours would be the residences at the southeast corner of 6th Street and Cleveland Avenue, approximately 1,430 feet (435 meters) southeast of the Project site. In contrast, the most stringent standards for NO₂NO_x and CO are based on shorter averaging times, therefore, LST impacts for NO₂NO_x and CO are assessed for sensitive receptor locations where individuals may be located for as little as 1 hour. The nearest off-site receptor that could remain in place for at least 1 hour ~~is~~ are the commercial land uses that border the site;~~daycare facility approximately 370 feet (130 meters) east of the Project site.~~

Page 4.3-64, footnote xxiv is deleted:

~~xxiv The quantitative LST thresholds generally increase as a project site gets larger. Therefore, using a smaller project site size for identifying the LST threshold results in a lower LST value for each of the pollutants being evaluated.~~

Page 4.3-65 to Page 4.3-67, the entire Localized Significance Threshold analysis discussion is replaced as follows:

LST Analysis – Construction Emissions: The proposed Project's maximum daily unmitigated construction activity concentrations are summarized in Table 4.3-28 and Table 4.3-29, respectively.

Table 4.3-28
Unmitigated Project Construction – Modeled LST CO and NO₂ Emissions

<u>Construction Pollutant</u>	<u>LST Threshold^(A)</u>	<u>LST Model Results^(B)</u>	<u>Exceeds Threshold?</u>
<u>NO₂ (1 Hour)</u>	<u>0.10 ppm</u>	<u>0.03</u>	<u>No</u>
<u>CO (1 Hour)</u>	<u>18.4 ppm</u>	<u>0.19</u>	<u>No</u>
<u>CO (8 Hours)</u>	<u>7.9 ppm</u>	<u>0.09</u>	<u>No</u>

Source: See FEIR Appendix H

(A) See Table 4.3-10.

(B) Results are at the closest occupied off-site receptor location where the receptor could be present for 1 hour or 8 hours. For CO, this location is in the commercial land uses west of the Project site, across Haven Avenue. The modeled receptor coordinates are as follows: CO 1 Hour and 8 Hour: 446841.99 meters easting, 3771781.53 meters northing. For NO₂, this location is in the commercial land uses east of the Project site, across Utica Avenue. The modeled receptor coordinates are as follows: 447312.00 meters easting, 3771740.00 meters northing.

Table 4.3-29
Unmitigated Project Construction – Modeled LST PM₁₀ and PM_{2.5} Emissions

Construction Pollutant	LST Threshold^(A)	LST Model Results^(B)	Exceeds Threshold?
<u>PM₁₀ (24 Hours)</u>	<u>10.4 µg/m³</u>	<u>0.35 µg/m³</u>	<u>No</u>
<u>PM_{2.5} (24 Hours)</u>	<u>10.4 µg/m³</u>	<u>0.35 µg/m³</u>	<u>No</u>
Source: See FEIR Appendix H (A) See Table 4.3-10. (B) Results are at the closest occupied off-site receptor location where the receptor could be present for 24 hours, which is the residential area located at the southeast corner of 6th Street and Cleveland Avenue approximately 1,430 feet (435 meters) southeast of the Project site. The modeled receptors coordinates are 447720.00 meters easting, 3771650.00 meters northing.			

As shown in Table 4.3-28 and Table 4.3-29, the Project's construction emissions would not exceed applicable SCAQMD construction LSTs. This impact would be less than significant. It is noted that the implementation of Mitigation Measure AIR-2B would serve to further reduce the less than significant magnitude of this impact.

LST Analysis – Operational Emissions: The proposed Project's maximum daily unmitigated Phase 2 LST operational activity concentrations are summarized in Table 4.3-30 and 4.3-31, respectively.

Table 4.3-30
Unmitigated Project Operation – Modeled LST CO and NO₂ Emissions

Construction Pollutant	LST Threshold^(A)	LST Model Results^(B)	Exceeds Threshold?
<u>NO₂ (1 Hour)</u>	<u>0.10 ppm</u>	<u>0.01 ppm</u>	<u>No</u>
<u>CO (1 Hour)</u>	<u>18.4 ppm</u>	<u>0.05 ppm</u>	<u>No</u>
<u>CO (8 Hours)</u>	<u>7.9 ppm</u>	<u>0.02 ppm</u>	<u>No</u>
Source: See FEIR Appendix H (A) See Table 4.3-10. (B) Results are at the closest occupied off-site receptor location where the receptor could be present for 1 hour or 8 hours. For 1 Hour and 8 Hour CO and 1 Hour NO ₂ , this location is in the commercial land uses east of the Project site, across Utica Avenue. The modeled receptor coordinates are as follows: 447260.00 meters easting, 3771925.00 meters northing.			

Table 4.3-31
Unmitigated Project Operation – Modeled LST PM₁₀ and PM_{2.5} Emissions

Construction Pollutant	LST Threshold^(A)	LST Model Results^(B)	Exceeds Threshold?
<u>PM₁₀ (24 Hours)</u>	<u>2.5 µg/m³</u>	<u>0.77 µg/m³</u>	<u>No</u>
<u>PM_{2.5} (24 Hours)</u>	<u>2.5 µg/m³</u>	<u>0.77 µg/m³</u>	<u>No</u>
Source: See FEIR Appendix H (A) See Table 4.3-10. (B) Results are at the closest occupied off-site receptor location where the receptor could be present for 24 hours, which is the residential area located at the southeast corner of 6th Street and Cleveland Avenue approximately 1,430 feet (435 meters) southeast of the Project site. The modeled receptors coordinates are 447720.00 meters easting, 3771650.00 meters northing.			

As shown in Table 4.3-30 and 4.3-31, the proposed Project's operational emissions would not exceed applicable SCAQMD operational LSTs so this impact would be less than significant. It is noted that the implementation of Mitigation Measures AIR-2C to AIR-2F and Mitigation Measures GHG-1 and GHG-2 would serve to further reduce the less than significant magnitude of this impact.

~~LST Analysis — Construction Emissions:~~ The proposed Project's maximum daily unmitigated Phase 1 and Phase 2B construction emissions at the closest offsite receptor locations are summarized in Table 4.3-28 and Table 4.3-29, respectively.

Table 4.3-28
Unmitigated Project Construction — Phase 1 LST Emissions Estimates

Year / Season	Maximum Daily LST Emissions (Pounds Per Day) ^(A)			
	NOx	CO	PM ₁₀ ^(B)	PM _{2.5} ^(B)
Summer 2024	116.1	206.0	29.0	10.1
Winter 2024	103.5	129.5	21.9	6.6
Summer 2025	115.1	239.8	36.4	12.9
Winter 2025	100.4	171.0	29.2	10.9
SCAQMD CEQA Threshold^(C)	270	2,193	283	141
Threshold Exceeded?	No	No	No	No

Source: See Appendix C1.2 and SCAQMD ~~Error! Bookmark not defined.~~

(C) Maximum daily emissions include both on- and off-site emissions, which overestimates potential LST impacts.

(D) PM₁₀ and PM_{2.5} values are total emissions. Refer to Appendix C1.2 for component exhaust and dust emissions levels.

(E) LST thresholds are based on a 5-acre project and 25-meter receptor distance for NOx and CO and a 400-meter receptor distance for PM₁₀ and PM_{2.5}. The 25-meter LST distance is shorter than the distance between the Project site boundary and the affected receptor and thus provides a conservative assessment of potential impacts because LST thresholds are lower the closer a project site is to a receptor).

Table 4.3-29
Unmitigated Project Construction — Phase 2B LST Emissions Estimates

Year / Season	Maximum Daily LST Emissions (Pounds Per Day) ^(A)			
	NOx	CO	PM ₁₀ ^(B)	PM _{2.5} ^(B)
Winter 2026	42.0	52.8	24.2	12.3
Summer 2026	25.2	51.9	6.2	2.1
Winter 2027	12.1	22.4	3.1	1.0
SCAQMD CEQA Threshold^(C)	270	2,193	283	141
Threshold Exceeded?	No	No	No	No

Source: See Appendix C1.2 and SCAQMD

(A) Maximum daily emissions include both on- and off-site emissions, which overestimates potential LST impacts.

(B) PM₁₀ and PM_{2.5} values are total emissions. Refer to Appendix C1.2 for component exhaust and dust emissions levels.

(C) LST thresholds are based on a 5-acre project and 25-meter receptor distance for NOx and CO and a 400-meter receptor distance for PM₁₀ and PM_{2.5}. The 25-meter LST distance is shorter than the distance between the Project site boundary and the affected receptor and thus provides a conservative assessment of potential impacts because LST thresholds are lower the closer a project site is to a receptor).

As shown in Table 4.3-42 and Table 4.3-43, the proposed Project's construction emissions would not exceed applicable SCAQMD construction LSTs. This impact would be less than significant. It is noted that the implementation of Mitigation Measure AIR-2B would serve to further reduce the less than significant magnitude of this impact.

LST Analysis—Operational Emissions: The proposed Project's maximum daily unmitigated Phase 1 and Phase 2 LST operational emissions at the closest off-site receptor locations are summarized in Table 4.3-30 and 4.3-31, respectively.

**Table 4.3-30
Unmitigated Project Operation – Phase 1 LST Emissions Estimates**

Source	Maximum Daily LST Emissions (Pounds Per Day) ^(A)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Mobile ^(B)	3.7	3.7	1.3	0.4
Area	0.4	46.0	0.1	0.1
Energy	6.1	5.1	0.5	0.5
Stationary ^(C)	26.0	9.8	4.9	4.9
Total On-Site Emissions ^(D)	36.1	64.6	6.8	5.8
SCAQMD CEQA Threshold^(E)	270	2,193	68	38
Threshold Exceeded?	No	No	No	No

Source: See Appendix C and SCAQMD ~~Error! Bookmark not defined.~~

(A) Maximum daily emissions are for on-site sources only. See Table 4.3-23.

(B) Mobile source emissions are assumed to be 2% of the total regional mobile source emissions presented in Table 4.3-23.

(C) Phase 1 stationary sources include tray shrink packers, boilers, and emergency generators.

(D) Totals may not equal due to rounding.

(E) LST thresholds are based on a 5-acre project and 25-meter receptor distance for NO_x and CO and a 400-meter receptor distance for PM₁₀ and PM_{2.5}. The 25-meter LST distance is shorter than the distance between the Project site boundary and the affected receptor and thus provides a conservative assessment of potential impacts because LST thresholds are lower the closer a project site is to a receptor.

**Table 4.3-31
Unmitigated Project Operation – Phase 2 LST Emissions Estimates**

Source	Maximum Daily LST Emissions (Pounds Per Day) ^(A)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Mobile ^(B)	3.5	3.5	1.3	0.4
Area	0.4	46.0	0.1	0.1
Energy	6.1	5.1	0.5	0.5
Stationary ^(C)	31.2	24.5	11.6	11.6
Total On-Site Emissions ^(D)	41.2	79.2	13.5	12.5
SCAQMD CEQA Threshold^(E)	270	2,193	68	38
Threshold Exceeded?	No	No	No	No

Source: See Appendix C and SCAQMD ~~Error! Bookmark not defined.~~

(A) Maximum daily emissions are for on-site sources only. See Table 4.3-23.

(B) Mobile source emissions are assumed to be 2% of the total regional mobile source emissions presented in Table 4.3-23.

(C) Phase 1 stationary sources include tray shrink packers, boilers, and emergency generators.

(D) Totals may not equal due to rounding.

(E) LST thresholds are based on a 5-acre project and 25-meter receptor distance for NO_x and CO and a 400-meter receptor distance for PM₁₀ and PM_{2.5}. The 25-meter LST distance is shorter than the distance between the Project site boundary and the affected receptor and thus provides a conservative assessment of potential impacts because LST thresholds are lower the closer a project site is to a receptor.

As shown in Table 4.3-30 and 4.3-31, the proposed Project's operational emissions would not exceed applicable SCAQMD operational LSTs so this impact would be less than significant. It is noted that the implementation of Mitigation Measures AIR-2C to AIR-2E and Mitigation Measures GHG-1 and GHG-2 would serve to further reduce the less than significant magnitude of this impact.

Page 4.3-69 to 4.3-70, the *Unmitigated Excess Cancer Risk Summary at MEIR* revised as follows:

Unmitigated Excess Cancer Risk Summary at MEIR

The modeled annual average DPM concentrations at the MEIR, in micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) and the resulting excess cancer risk estimate at the MEIR, are summarized in Table 4.3-32. Refer to Appendix C3 for detailed modeling results and HRA calculations.

Table 4.3-32
Total Unmitigated Excess Cancer Risk at Maximum Exposed Individual Receptor

Year	Activity / Scenario	Annual Average DPM Concentration ($\mu\text{g}/\text{m}^3$)	Excess Cancer Risk (Per Million Population) ^(A)
2024	Phase 1 Construction	~~0.01954~~ <u>0.01965</u>	3.5
2025	Phase 1 Construction	~~0.01727~~ <u>0.01739</u>	~~2.8~~ <u>2.9</u>
2026	Phase 2B Construction	~~0.00363~~ <u>0.00361</u>	0.1
2026	Phase 1 Operations (Mobile)	~~0.00140~~ 0.00198	<0.1
2026	Phase 1 Operations (Stationary)	-- ^(B)	<0.1
2027	Phase 2B Construction	~~0.00086~~ <u>0.00014</u>	0.1
2027	Phase 2 Operations (Mobile)	~~0.00140~~ 0.00198	<0.1
2027	Phase 2 Operations (Stationary)	-- ^(B)	<0.1
2028 to 2053	Phase 2 Operations (Mobile)	~~0.00140~~ 0.00198	~~0.9~~ <u>1.3</u>
2028 to 2053	Phase 2 Operations (Stationary)	--	0.6
Total Excess Cancer Risk			~~8.4~~ <u>8.5</u>
SCAQMD Carcinogenic Threshold			10.0
Threshold Exceeded?			No
Source: MIG (see DEIR Appendix C3.1 and C3.2) and FEIR Appendix H SCAQMD			
(A) Excess cancer risk estimate assumes the receptor is in the infant stage at the beginning of exposure and proceeds to child and adult stages over the 30-year exposure duration.			

(B) Natural gas-fired stationary sources would not emit DPM. Carcinogenic risks from these sources are based on multiple gaseous pollutant concentrations. Refer to appendix C3.2 for detailed, pollutant specific concentrations and cancer risk estimates.

As shown in Table 43-32, the Project's total incremental increase in excess carcinogenic risk at the MEIR location would be approximately 8.58.4 excess cancers per million population, which is below the SCAQMD threshold of 10 excess cancers per million population. Therefore, this impact would be less than significant. It is noted that Mitigation Measures AIR-2B and ~~AIR-2E~~AIR-2F would further reduce the less than significant magnitude of this impact through the use U.S EPA / CARB Tier IV construction equipment and truck dock electrification infrastructure, respectively.

Page 4.3-70 to 4.3-71, the Unmitigated Excess Cancer Risk Summary at MESR is revised as follows:

Unmitigated Excess Cancer Risk Summary – MESR

The modeled annual average DPM concentrations and the resulting excess cancer risk estimate at the MESR are summarized in Table 4.3-33. Refer to Appendix C3 for detailed modeling results and HRA calculations.

Table 4.3-33
Total Unmitigated Excess Cancer Risk at Maximum Exposed Student Receptor

Year	Activity / Scenario	Annual Average DPM Concentration ($\mu\text{g}/\text{m}^3$)	Excess Cancer Risk (Per Million Population) ^(A)
2024	Phase 1 Construction	~~0.17359~~ 0.17361	1.9
2025	Phase 1 Construction	~~0.12634~~ 0.12983	1.4
2026	Phase 2B Construction	~~0.02336~~ 0.02335	0.3
2026	Phase 1 Operations (Mobile)	~~0.00105~~ 0.00704	<0.1
2026	Phase 1 Operations (Stationary)	--(B)	<0.1
2027	Phase 2B Construction	~~0.00276~~ 0.00042	<0.1
2027	Phase 2 Operations (Mobile)	~~0.00105~~ 0.00704	<0.1
2027	Phase 2 Operations (Stationary)	--(B)	0.2
2028	Phase 2 Operations (Mobile)	~~0.00105~~ 0.00704	<0.1
2028	Phase 2 Operations (Stationary)	--	0.2
Total Excess Cancer Risk			~~4.0~~ 4.2
SCAQMD Carcinogenic Threshold			10.0
Threshold Exceeded?			No
Source: MIG (see <u>DEIR</u> Appendix C3.1 and C3.2) and <u>FEIR</u> Appendix H ~~SCAQMD~~			

- (A) Excess cancer risk estimate assumes the receptor is two years old at the beginning of construction and stays at the site for 5 years until they go to kindergarten at a different location.
- (B) Natural gas-fired stationary sources would not emit DPM. Carcinogenic risks from these sources are based on multiple gaseous pollutant concentrations. Refer to appendix C3.2 for detailed, pollutant specific concentrations and cancer risk estimates.

As shown in Table 4.3-33, the total incremental increase in excess carcinogenic risk at the MESR location would be approximately 4.24 excess cancers per million population, which is below the SCAQMD threshold of 10 excess cancers per million population. Therefore, this impact would be less than significant.

Page 4.3-71, Table 4.3-12 was misidentified and is revised as follows:

Table 4.3-12: Table 4.3-34: Unmitigated Excess Non-Cancer Risk at MEIR, MEIW, and MESR

Source	Chronic (Annual)		Chronic (8-Hour)		Acute	
	MEIR	MESR	MEIR	MESR	MEIR	MESR
CHP Generator 1	5.6E-03	1.7E-02	3.6E-03	1.1E-02	8.2E-03	2.3E-02
CHP Generator 2	5.6E-03	1.7E-02	3.6E-03	1.1E-02	8.2E-03	2.3E-02
Boiler 1	8.6E-04	1.8E-03	4.6E-05	9.4E-05	4.2E-04	7.3E-04
Boiler 2	8.6E-04	1.8E-03	4.6E-05	9.4E-05	4.2E-04	7.3E-04
DPM Emissions	3.9E-03	3.5E-02	N/A	N/A	N/A	N/A
Total	0.02	0.07	0.01	0.02	0.02	0.05
SCAQMD Threshold	1.0	1.0	1.0	1.0	1.0	1.0
Threshold Exceeded?	No	No	No	No	No	No

Source: See DEIR Appendix C and FEIR Appendix H

DEIR Section 4.3.5 Air Quality, Impacts and Mitigation Measures, Cumulative Impacts (Impact AIR-5)

Page 4.3-74, the discussion of cumulative air quality impacts is revised as follows:

Impact AIR-5 – Would the project cause substantial adverse cumulative impacts with respect to air quality?

Analysis of Impacts

For the purposes of this cumulative air quality impact analysis, the geographic context is the South Coast Air Basin in which the Project is located. As described in Section 4, the level of expected future development in the City and surrounding areas is substantial (i.e., 174 projects in four jurisdictions with 8,362 residential units and approximately 15 million square feet of non-residential development). In addition, the City expects continued growth based on its General Plan population and housing projections. While it is possible that cumulative projects 16-18 may be under construction during the same timeframe as the Project, it is difficult to predict with any certainty due to the many factors involved in starting and maintaining construction (e.g., financing, equipment and staff availability, weather, etc.). The development of these and other development

projects throughout the Basin would contribute to local and regional air quality emissions that could combine with the proposed Project's emissions.

In developing its CEQA significance thresholds, the SCAQMD considered the emission levels at which a Project's individual emissions would be cumulatively considerable.⁵⁸³⁶ As described under Impact AIR-1 and Impact AIR-2A, the proposed Project would result in potentially significant VOC and NOx impacts for regional construction emissions, regional operational emissions, and combined Phase 1 operational and Phase 2B construction emissions. The Project would incorporate Mitigation Measures AIR-2A through AIR-2FAIR-2E; however, regional operational emissions for NOx as well as combined operational and construction emissions for NOx would remain above SCAQMD thresholds and have the potential to conflict with the 2022 AQMP by causing or contributing to existing or future regional air quality violations. cause or contribute to existing or future air quality violations, thus conflicting with the 2022 AQMP. Thus, the proposed Project would result in a cumulatively considerable increase in regional criteria air pollutants. This impact would be significant and unavoidable even with the incorporation of feasible mitigation measures.

As described under Impact AIR-3, the proposed Project would not expose sensitive receptors to substantial pollutant concentrations. Project construction and operational activities would not generate emissions that exceed SCAQMD LST thresholds at off-site receptor locations. In addition, project construction and operational activities would not generate TAC emissions that would result in adverse carcinogenic or non-carcinogenic health risks at any off-site residential, school, or employment location. Finally, the proposed Project's criteria air pollutant emissions would not significantly exacerbate or contribute to significant health risks at or in the proximity of the Project area. Thus, since the proposed Project would not result in individual pollutant concentrations that exceed SCAQMD thresholds it would not result in a cumulatively considerable contribution to pollutant concentrations at sensitive receptor locations. This impact would be less than significant. It is noted that Mitigations Measures AIR-2A to AIR-2F would serve to further reduce the less than significant magnitude of this impact through the incorporation of mitigation measures that reduce the Project's local and regional criteria air pollutant and TAC emissions levels.

Finally, as described under Impact AIR-4, the proposed Project would not result in other emissions that would adversely affect a substantial number of people and thus would result in a cumulatively considerable contribution to impacts resulting from other emissions. This impact would be less than significant. These impacts would be significant and unavoidable.

Level of Significance Before Mitigation

Potentially Significant.

Mitigation Measures

See Mitigation Measures AIR-2A through AIR-2FAIR-2E and Mitigation Measures GHG-1 and GHG-2

Level of Significance After Mitigation

Significant and Unavoidable.

DEIR Section 4.3.5, Air Quality, References

- 20 South Coast Air Quality Management District. Historical Data by Year for 2021, 2022, 2023 and 2024. (SCAQMD 2023a, 2023b, and 2023c, and 2024). <http://www.aqmd.gov/home/air-quality/air-quality-data-studies/historical-data-by-year>
- 52 California Environmental Protection Agency. (CalEPA 2022). Final Designation of Disadvantaged Communities Pursuant to Senate Bill 535.
- 53 South Coast Air Quality Management District. Rule 1304. Adopted November 5, 2021. <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiii/rule-1304-exemptions.pdf?sfvrsn=4>
- 54 North of the River Recreation and Park District. Meadow Creek Well Water Supply and Treatment Facility IS/MND. SCH# 2023070417. (NRRPD 2023).
- 55 South Coast Air Quality Management District. Final Localized Significance Threshold Methodology. July 2008. < <https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf> >
- 56 CARB. APPENDIX D: TABLES FOR EMISSION REDUCTION. October 24, 2024. <https://ww2.arb.ca.gov/sites/default/files/2024-11/Appendix%20D.pdf>
- 57 Application of the South Coast Air Quality Management District for Leave to File Brief of the Amicus Curiae in Support of Neither Party and [Proposed] Brief for Amicus Curiae. April 6, 2015. Web. March 1, 2019. <https://www.courts.ca.gov/documents/9-s219783-ac-south-coast-air-quality-mgt-dist-041315.pdf>
- 58 South Coast Air Quality Management District (SCAQMD) 2003. *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution*. Diamond Bar, CA. August 2003.

DEIR Section 4.8.2 GHG, Regulatory Framework, State, Assembly Bill 32 (California Global Warming Solutions Act) and Related GHG Goals

Page 4.8-11, second paragraph: On September 16, 2022, Governor Newsom signed into law AB 1279, the California Climate Crisis Act, that codified California's 2045 carbon neutrality goal and established a GHG emission reduction target of 85% below 1990 levels. AB 1279 added Section 38562.2 to the Health and Safety Code relating to GHGs. AB 1279 essentially accelerates and establishes a more restrictive long-term GHG reduction goal than that originally established by EO S-3-05 (reduce statewide GHG emissions 80% below 1990 levels by 2050).

DEIR Section 4.8.2 GHG, Regulatory Framework, State, Scoping Plan

Page 4.8-11, last paragraph: The third update to the scoping plan, the 2022 Scoping Plan,²¹ was released in May 2022 and adopted by CARB in December 2022. The plan presents a scenario for California to meet the State goal of reducing GHG emissions 40% below 1990 levels by 2030 and to achieve carbon neutrality by 2045. Specifically, the 2022 Scoping Plan:

- Identifies a path to keep California on track to meet its SB 32 GHG reduction target of at least 40 percent below 1990 emissions by 2030. The 2022 Scoping Plan identifies and plans for an accelerated 2030 GHG reduction target (48% below 1990 emissions by 2030) that is above and beyond the 2017 Scoping Plan requirements and thus the successful implementation of the 2022 Scoping Plan ensures the successful implementation of the 2017 Scoping Plan.
- Identifies a technologically feasible, cost-effective path to achieve carbon neutrality by 2045 and a reduction in anthropogenic emissions by 85 percent below 1990 levels. Thus, the successful implementation of the 2022 Scoping Plan ensures achievement of not only the goals of AB 1279 but also EO S-3-05 (to reduce GHG emissions 80% below 1990 levels by 2050).

DEIR Section 4.8.5 GHG, Impacts and Mitigation Measures, GHG Emissions (Impact GHG-1)

Page 4.8-27, Table 4.8-5 is revised as follows:

Table 4.8-5
Project Construction GHG Emissions (Phase 1 and Phase 2)

Source	Total GHG Emissions (Metric Tons)				
	CO ₂	CH ₄	N ₂ O	Refrigerant (CO ₂ e)	CO ₂ e
Phase 1 Construction	~~8,632.4~~ <u>8,854.3</u>	0.5	0.6	~~8.4~~ <u>8.6</u>	~~8,830.3~~ <u>9,063.6</u>
Phase 1 30-Year Average ^(A)	~~287.7~~ <u>295.1</u>	<0.1	<0.1	0.3	~~294.3~~ <u>302.1</u>
Phase 2B Construction	~~1,543.2~~ <u>1,576.4</u>	0.1	0.1	1.3	~~1,575.6~~ <u>1,610.4</u>
Phase 2B 30-Year Average ^(A)	~~88.2~~ <u>52.5</u>	<0.1	<0.1	0.1	~~89.6~~ <u>53.7</u>
Total 30-Year Average^{(A),(B)}	~~339.2~~ <u>347.7</u>	<0.1	<0.1	0.3	~~346.9~~ <u>355.8</u>
Source: MIG (see Appendix C1.2)					
(A) Emissions are amortized over the life of the project, which is presumed to be 30 years. The Phase 1 and Phase 2B averages are based on only Phase 1 and Phase 2B construction activities, respectively. The total 30-year average is the sum of the individual Phase 1 and Phase 2B averages.					
(B) Total may not equal due to rounding.					

Page 4.8-31, first full paragraph, third sentence is revised as follows: In addition to these GHG-specific mitigation measures, the City shall also require the applicant to implement Mitigation Measures AIR-2CAIR-3, Reduce Light-Duty Vehicle Trip Emissions, AIR-2DAIR-4/TRA-1, Prepare VMT/TDM Reduction Plan, and AIR-2EAIR-5, Reduce Truck Trip Emissions, which would increase the amount of passenger vehicle and truck EV charging infrastructure installed at the Project site and reduce employee trips and associated VMT by approximately 5%.

Page 4.8-31, footnote xvii is revised as follows:

xviii As discussed under Impact AIR-2, the effectiveness of Mitigation Measures AIR-2~~AIR-3~~, AIR-2A~~AIR-4~~, and AIR-2E~~AIR-5~~ may be higher than 0.4%; however, this EIR applies only the minimum quantified reduction in mobile source emissions provided by these mitigation measures

Page 4.8-28 to 4.8-29, Tables 4.8-6 to 4.8-10 are revised as follows:

Table 4.8-6

Phase 1 and Phase 2 Operations Maximum GHG Emissions Summary (Unmitigated)

Scenario	Total Unmitigated Operational GHG Emissions (MTCO ₂ e Per Year)		
	Phase 1	Phase 2 Without Thermal Recovery	Phase 2 With Thermal Recovery
Project Maximum Operational GHG Emissions (Unmitigated)	~~37,289.2~~ <u>37,297.0</u>	~~51,366.4~~ <u>51,375.4</u>	~~48,593.6~~ <u>48,602.7</u>
Existing Site Emissions	7,467.5	7,467.5	7,467.5
Total Net Change ^(A)	~~29,821.6~~ <u>29,829.4</u>	~~43,898.9~~ <u>43,907.8</u>	~~41,126.0~~ <u>41,135.2</u>
SCAQMD Industrial GHG Threshold	10,000	10,000	10,000
SCAQMD Threshold Exceeded?	Yes	Yes	Yes
Source: MIG (see Appendix C1 and C2) Note: existing includes beverage plant operating when NOP was issued			
(A) Totals may not equal due to rounding.			

Table 4.8-7

Phase 1 Maximum Operational GHG Emissions (Unmitigated)

Source	GHG Emissions (MTCO ₂ e Per Year)		
	Existing	Phase 1	Net Change
Mobile	5,787.6	22,269.7	16,482.1
Area	5.5	21.5	16.0
Energy	1,583.4	7,663.0	6,079.5
Water	11.5	610.0	598.4
Waste	79.2	243.7	164.5
Refrigerants	--	15.2	15.2
Off-Road ^(A)	--	--	--
Stationary -Tray Shrink Packers	--	315.1	315.1
Stationary – Boilers	--	5,751.4	5,751.4
Stationary – Emergency Generator	0.2	105.3	105.1
<u>Stationary – TRUs</u>	<u>--</u>	<u><0.1</u>	<u><0.1</u>
Construction (30-Year Average) ^(B)	--	294.3 <u>302.1</u>	294.3 <u>302.1</u>
Total^(C)	7,467.5	~~37,289.2~~ <u>37,297.0</u>	~~29,821.6~~ <u>29,829.4</u>
SCAQMD Industrial GHG Threshold			10,000
SCAQMD Industrial Threshold Exceeded?			Yes

Source: MIG (See Appendix C1 and C2, Table C2-06.4) Note: existing includes beverage plant operating when NOP was issued
 (A) Electric off-road equipment emissions are included in CalEEMod "Energy" emissions estimates.
 (B) See Table 4.8-5. Average construction emissions are for Phase 1 only.
 (C) Totals may not equal due to rounding.

Table 4.8-8
Phase 2 Maximum Operational GHG Emissions - Without Thermal Recovery (Unmitigated)

Source	GHG Emissions (MTCO ₂ e Per Year)		
	Existing	Phase 2	Net Change
Mobile	5,787.6	21,809.0	16,021.4
Area	5.5	21.5	16.0
Energy	1,583.4	4,504.0	2,920.6
Water	11.5	680.8	669.2
Waste	79.2	243.7	164.5
Refrigerants	--	15.2	15.2
Off-Road ^(A)	--	--	--
Stationary -Tray Shrink Packers	--	315.1	315.1
Stationary – Boilers	--	11,502.7	11,502.7
Stationary - Cogeneration	--	11,822.2	11,822.2
Stationary – Emergency Generator	0.2	105.3	105.1
<u>Stationary – TRUs</u>	--	<u><0.1</u>	<u><0.1</u>
Construction (30-Year Average) ^(B)	--	~~346.9~~ <u>355.8</u>	~~346.9~~ <u>355.8</u>
Total^(C)	7,467.5	~~51,366.4~~ <u>51,375.4</u>	~~43,898.9~~ <u>43,907.8</u>
SCAQMD Industrial GHG Threshold			10,000
SCAQMD Industrial Threshold Exceeded?			Yes
Source: MIG (See Appendix C1 and C2, Table C2-06.7) Note: existing includes beverage plant operating when NOP was issued			
(A) Electric off-road equipment emissions are included in CalEEMod "Energy" emissions estimates.			
(B) See Table 4.8-5. Average construction emissions are for Phase 1 and Phase 2 combined.			
(C) Totals may not equal due to rounding.			

Table 4.8-9
Phase 2 Maximum Operational GHG Emissions - With Thermal Recovery (Unmitigated)

Source	GHG Emissions (MTCO ₂ e Per Year)		
	Existing	Phase 2	Net Change
Mobile	5,787.6	21,809.0	16,021.4
Area	5.5	21.5	16.0
Energy	1,583.4	4,504.0	2,920.6
Water	11.5	680.8	669.2
Waste	79.2	243.7	164.5
Refrigerants	--	15.2	15.2
Off-Road ^(A)	--	--	--
Stationary -Tray Shrink Packers	--	315.1	315.1
Stationary – Boilers	--	8,729.9	8,729.9
Stationary - Cogeneration	--	11,822.2	11,822.2
Stationary – Emergency Generator	0.2	105.3	105.1
Stationary – TRUs	--	<0.1	<0.1
Construction (30-Year Average) ^(B)	--	346.9	346.9
		<u>355.8</u>	<u>355.8</u>
Total^(C)		<u>48,593.6</u>	<u>41,126.0</u>
	7,467.5	<u>48,602.7</u>	<u>41,135.2</u>
SCAQMD Industrial GHG Threshold			10,000
SCAQMD Industrial Threshold Exceeded?			Yes
Source: MIG (See Appendix C1 and C2, Table C2-06.8) Note: existing includes beverage plant operating when NOP was issued			
(A) Electric off-road equipment emissions are included in CalEEMod "Energy" emissions estimates.			
(B) See Table 4.8-5. Average construction emissions are for Phase 1 and Phase 2 combined.			
(C) Totals may not equal due to rounding.			

Page 4.8-30, first paragraph: As shown in Table 4.8-6, the proposed Project would result in a net increase in annual GHG emissions compared to existing conditions for all phases and operating scenarios that is above the SCAQMD's industrial threshold of 10,000 MTCO₂e per year. During initial Phase 1 operations in 2026 (see Table 4.8-7), the Project would result in a net increase in GHG emissions equal to 29,829 ~~29,822~~ MTCO₂e, with the largest The net increase in GHG emissions during Phase 2 would be contingent on the amount of net electricity and thermal recovery that occurs from the proposed cogeneration system but would be between approximately 43,908 ~~43,899~~ MTCO₂e per year (without thermal recovery – see Table 4.8-4) and approximately 41,135 ~~41,126~~ MMBtu (with thermal recovery) . . .

Page 4.8-32, Table 4.8-10 is revised as follows:

Table 4.8-10
Phase 1 and Phase 2 Operations - Maximum GHG Emissions Summary (Mitigated)

Scenario	Total Mitigated Operational GHG Emissions (MTCO ₂ e Per Year)		
	Phase 1	Phase 2 Without Thermal Recovery	Phase 2 With Thermal Recovery
Project Maximum Operational GHG Emissions (Unmitigated)	37,289.2 <u>37,297.0</u>	51,366.4 <u>51,375.4</u>	48,593.6 <u>48,602.7</u>
Mitigation Measure GHG-1 and GHG-2 Emissions Reductions	-151.3	-67.5	-67.5
Mitigation Measure ~~AIR-2~~ ~~CAIR-3~~ , ~~AIR-2~~ ~~DAIR-4~~ , and ~~AIR-2~~ ~~EAIR-5~~ Emissions Reductions	-95.0	-92.5	-92.5
Subtotal, Mitigation	246.2	160.4	160.4
Project Maximum Operational GHG Emissions (Mitigated)	37,042.9 <u>37,050.2</u>	51,206.0 <u>51,215.4</u>	48,433.2 <u>48,442.7</u>
Existing Site Emissions	7,467.5	7,467.5	7,467.5
Total Net Change ^(A)	29,575.4 <u>29,583.2</u>	43,738.5 <u>43,747.9</u>	40,965.7 <u>40,975.2</u>
SCAQMD Industrial GHG Threshold	10,000	10,000	10,000
SCAQMD Threshold Exceeded?	Yes	Yes	Yes
Source: MIG (see Appendix C1 and C2) Note: existing includes beverage plant operating when NOP was issued (B) Totals may not equal due to rounding.			

Page 4.8-32, Mitigation Measure GHG-2 is revised as follows:

Mitigation Measure GHG-2: Reduce Building Energy Consumption and GHG Emissions. To reduce GHG emissions associated with the performance of the building envelope and systems components covered by Title 24 of the California Code of Regulations, the City shall require all new construction and major renovations undertaken by the applicant associated with the Project to be designed to have a total energy design rating that is at least 5% less than the standard building design for Climate Zone 1045. The energy budget for the standard design building and the energy budget for the proposed design building shall be determined in accordance with the definitions and approach set forth in the version of the Building Energy Efficiency Standards (Energy Code) that is in effect at the time of building permit approval (currently the 2022 Energy Code), unless the City has adopted local requirements that are more stringent than the Energy Code. The requirement to reduce a project's energy budget by 5% below the standard design building shall not apply if the Energy Code or the City has already established a zero net energy requirement for the standard design building.

Page 4.8-33, first paragraph is revised as follows:

See also Mitigation Measure ~~AIR-2~~~~CAIR-3~~ (Reduce Light-Duty Vehicle Trip Emissions), ~~AIR-2~~~~DAIR-4~~/TRA-1 (Prepare VMT/TDM Reduction Plan) and ~~AIR-2~~~~EAIR-5~~ (Reduce Truck Trip Emissions).

DEIR Section 4.8.5 GHG, Impacts and Mitigation Measures, Applicable GHG Plans, Policies, and Regulations (Impact GHG-2)

Page 4.8-33, the discussion of consistency with the 2022 Climate Change Scoping Plan is revised as follows:

- CARB's 2022 Climate Change Scoping Plan is a state-level plan intended to integrate policies, programs, and investments to achieve the State's climate change goals. As noted in Section 4.8.2, the 2022 Scoping Plan both ensures the State stays on track to meet 2030 GHG reduction goals and establishes the State's plan for achieving long-term GHG reduction goals. Thus, consistency with the 2022 Scoping Plan also ensures consistency with past Scoping Plan efforts such as the 2017 Scoping Plan and the State's long-term GHG reduction goals, including goals established by AB 1279 and EO S-3-05. The major elements of the plan . . .

DEIR Section 4.9.4, Hazards and Hazardous Materials, Impacts and Mitigation - HAZMAT-5 (Airports), page 4.9-20, paragraph 4 and MM HAZ-3

Map 2-4, Compatibility Policy Map, Airspace Protection Zones, in the Ontario International Airport Land Use Compatibility Plan (OIA LUCP) indicates the majority of the Project site is within the maximum 70-foot building height in the High Terrain Zone and a portion of the site is within the maximum 70 - 100 foot building height area. The Project also proposes several tall buildings on the site (i.e., ASRS is max. 130 feet and 70 feet average, PC building is max. 41 feet, and DC is max. 45 feet). These buildings are approximately 10,000 feet north-northeast of the closest ONT runway. Therefore, the Project will need to obtain clearance from the Federal Aviation Administration (FAA) and comply with its lighting/signage restrictions and warning improvements. These potential restrictions are addressed in Mitigation Measure HAZ-3 below.

The Project applicant initiated consultation with the Federal Aviation Administration (FAA) Obstruction Evaluation / Airport Airspace Analysis (OE/AAA) Group which concluded on January 26, 2024. This consultation was to determine whether the construction or operation of the Project would affect the National Airspace System (NAS). The Project applicant provided site plan, building elevation, and topographical information to the FAA for their review through the FAA OE/AAA online portal. Email and telephone communication continued through June 11, 2024.

On April 4, 2024, the FAA determined that the main building would create no hazard on the NAS, and conditioned requirements such as prohibiting strobe lighting with which the Project will comply. The Project would require the use of a crane during its construction, which the FAA determined (on June 11, 2024), as a temporary structure, would create no hazard on the NAS.

As a result, the construction and operation of the Project would not create a hazard on the NAS and a less than significant impact would occur with the implementation of the required lighting restrictions as conditioned by the FAA.

Regarding review of the City's updated General Plan in 2021 and ALUCP compliance, the Ontario International Airport – Inter Agency Collaborative (ONT-IAC) was formed to ensure that new development is compatible with the Ontario International Airport (ONT) Influence Area (AIA). The ONT-IAC implements the policies and criteria of the Airport Land Use Compatibility Plan (ALUCP) to prevent future incompatible land uses surrounding ONT and minimizing the public's exposure to excessive noise and safety hazards. The ALUCP does not address existing incompatible land uses and does not place any restrictions on the airport or its flight operations. ONT-IAC is represented by all agencies affected by existing and future airport impacts and administered by the City of Ontario. Its members include representatives from the County of San Bernardino and

the cities of Chino, Fontana, Montclair, Ontario, Rancho Cucamonga, and Upland. This inter-agency partnership works to protect the public, health, safety and welfare and fulfill state requirements to protect the airport from encroachment of incompatible land uses and protect the areas around the airport from environmental impacts.

<https://www.ontarioca.gov/government/community-development/planning/planning-programs/ontario-international-airport-inter>

The Draft EIR for the General Plan was routed to the City of Ontario as standard practice since they are an adjacent agency which provided them an opportunity to speak to or highlight any concerns they had with the General Plan relative to the ALUCP. In addition, as part of the GP EIR NOP process, our consultant Raimi & Associates conducted a series of 18 stakeholder interviews on February 5, 6 and 20, 2021. Invitations were sent to a number of stakeholders which included the City of Ontario. Among those stakeholders that participated in this interview process was the Ontario Convention Center and Visitors Bureau. This was the only organization affiliated with the City of Ontario that responded to the City's invitations. City staff did not receive any comments from Ontario on the General Plan, its DEIR or the FEIR. The City of Ontario provided no comments with regard to the ALUCP. Thus, Ontario had no concerns with our GP contradicting the ALUCP. This is further evidenced by the fact that the City also provided no comments on the El Camino Project EIR relative to the ALUCP. Here is the list of the NOP and responses to the NOP from the GP EIR:

https://www.cityofrc.us/sites/default/files/2021-09/Appendix%202-2_NOP%20and%20NOP%20Comments.pdf

Lastly, the ALUCP does not actually establish a maximum height limitation but rather the ALUCP states that IF a project exceeds indicated height limitations it is subject to FAA clearance which the developer obtained for the El Camino Project.

HAZ-3: FAA Lighting Hazards. A minimum of 45 days prior to submittal of an application for a building permit for a project, the applicant shall consult with the City of Rancho Cucamonga Planning Department in order to ~~determine whether any implementing project related vertical structures will encroach into the 100 to 1 imaginary surface surrounding the ONT. If it is determined that there will be an encroachment into the 100 to 1 imaginary surface, the applicant shall file a FAA Form 7460-1, Notice of Proposed Construction or Alteration. If FAA determines that the implementing development project would potentially be an obstruction unless reduced to a specified height, the applicant and the City Planning Division will work with FAA to resolve any adverse effects on aeronautical operations including any~~ demonstrate the Project is consistent with FAA lighting or other restrictions or prohibitions which may include but are not limited to the following:

- a. Any use which would direct a steady light or flashing light of red, white, green, or amber colors associated with airport operations toward an aircraft engaged in an initial straight climb following takeoff or toward an aircraft engaged in a straight final approach toward a landing at an airport, other than an FAA-approved navigational signal light or visual approach slope indicator.
- b. Any use which would cause sunlight to be reflected towards an aircraft engaged in an initial straight climb following takeoff or towards an aircraft engaged in a straight final approach towards a landing at an airport.
- c. Any use which would generate smoke or water vapor or which would attract large concentrations of birds, or which may otherwise affect safe air navigation within the area.
- d. Any use which would generate electrical interference that may be detrimental to the operation of aircraft and/or aircraft instrumentation.

e. All retention and water quality basins shall be designed to dewater within 48 hours of a rainfall event.

DEIR Section 4.10, Hydrology and Water Quality

[The DEIR cited a Preliminary Engineering Design Report (PEDR) dated 4-2023 that the planned groundwater well would have a capacity of 1,270 gallons per minute (gpm). However, an updated version of the PEDR report dated 12-18-2023 indicated the well would have a capacity of 2,253 gpm. CVWD indicated this difference in maximum well capacity would not affect their regional supply compared to the earlier number of 1,270 gpm.]

DEIR Section 4.10.4, Hydrology & Water Quality, Impacts & Mitigation, page 4.10-17, paragraph 3

The Project involves construction and operation of a new domestic water well for CVWD. According to CVWD staff¹⁶, this well will be drilled to a depth of 1,200 feet and is expected to supply the District with 2,253 ~~1,270~~ gpm. A New Well Preliminary Report¹³ was also prepared for this CVWD well by Kear Groundwater dated December 18, 2023 ~~April 28, 2023~~. The Project is constructing the new CVWD well onsite to help improve supply and reliability of the entire CVWD water system consistent with its 2020 UWMP.

DEIR Section 4.10.4, Hydrology & Water Quality, Impacts & Mitigation, page 4.10-13, paragraph 3

A Water Supply Assessment⁷ (WSA) prepared by Dudek in August 2023 ~~May 2023~~ estimates the existing water demand for the Project site is 610.4 acre-feet per year (AFY, 1 AF = approximately 326,000 gallons) that is currently utilized for manufacturing, office uses, irrigation and bottled beverage distribution.

DEIR Section 4.11, Land Use and Planning, page 4.11-11, paragraph 1

In addition, the Project proposes a site plan and Master Plan that are consistent with the existing General Plan land use designation and the existing zoning classification. The site also has the same General Plan designation as the surrounding properties. However, the Project includes a request for a Master Plan pursuant to Section 17.112.010 of the City's Development Code (RCDC) to permit deviations from City Code Sections 17.130.040 and 17.138.020, which requires certain ground-floor uses along corridor frontages and projects with the Mixed Employment 2 (ME-2) zoning designation to comply with specific design criteria including block size, circulation and building types. The Project and production/manufacturing use (Manufacturing, Light) would require a Master Plan and Conditional Use Permit (CUP), per the City's existing development standards. The proposed Master Plan identifies a number of exceptions from the requirements of the City's RCDC. Table 4.11-3, Master Plan Consistency Analysis, evaluates these exceptions to determine if they represent any significant impacts to land use and planning. As shown in Table 4.11-3, the Project is generally consistent with the development goals of the General Plan and requirements of the RCDC.

DEIR Section 4.11, Land Use and Planning, 4.1.4, Impacts and Mitigation – IMPACT LAND-2, page 4.11-11

The following General Plan designations apply to the Project site and its immediate vicinity in the City's planning vision:

- Figure V-2: Vision Diagram within the General Plan depicts the intersection of 6th Street and Haven Avenue as a City Center.

- Figure LC-1: Vision Diagram (Community Activity Nodes) within the General Plan depicts the intersection of 6th Street and Haven Avenue as a Corridor Activity Node.
- Figure M- 6: Pedestrian Focus Areas within the General Plan depicts the site as within a Pedestrian Focus Area.

Analysis: The site is northeast of 6th Street/Haven Avenue. The Project will introduce hundreds of new employees onto a site that is within walking distance to a variety of housing opportunities to the east and north, and many commercial establishments along Haven Avenue to the west and south. The Project will also have pedestrian circulation around its perimeter so as to not interfere with pedestrian movement in the larger surrounding area. In these ways the Project will be an integral part of and contribute to this area functioning as a City Center, a Corridor Activity Node, and a Pedestrian Focus Area. Potential impacts would be less than significant and no mitigation is required.

DEIR Section 4.11, Land Use and Planning, Table 4.11-3, Master Plan Consistency Analysis (added row), page 4.11-14

RCDC Provision	RCDC (zoning) Standard	Project Master Plan	GP & RCDC Consistency
<u>Corridor Fronting Ground Floor Use Restrictions (RCDC17.130.040.B)</u>	<u>Corridor fronting ground floor commercial and retail uses required.</u>	<u>The Master Plan proposes no commercial or retail use at the ground floor fronting the corridor.</u>	<u>Master Plan is consistent with the General Plan in that existing industrial uses may remain and are permitted to expand with clean industrial uses. Master Plan is consistent with RCDC with no residential uses on ground floor fronting the corridor.</u>

[NOTE: Rather than commercial or retail frontages along the ground-floor facing the corridor, the Project proposes manufacturing uses along the ground-floor facing the corridor. This is consistent with the provisions of Development Code Section 17.130.040.B in that no residential uses are permitted on the ground-floor frontage. Further, this Master Plan request is consistent with the General Plan in that existing industrial uses may remain and are permitted to expand with clean industrial uses (General Plan, Volume 2, Page 87)].

DEIR Section 4.18, Tribal Cultural Resources

[During preparation of the DEIR, information from local tribal representatives was not reflected correctly in the text of Section 4.18.4, Impacts and Mitigation, Impact TCR-2, page DEIR 4.18-6, paragraphs 1 and 2, as shown below]

Analysis of Impacts

The proposed Project site is located within the ancestral territory of both the Serrano and Gabrieleno tribal groups and is therefore, of interest to both Tribes. However, only the Gabrieleno tribe requested consultation on this Project. In the past both the San Manuel and Gabrieleno tribes

have expressed concern regarding impacts to artifacts and resources of their tribes and recommended ~~three mitigation measures for cultural resources (see EIR Section 4.5) and the four~~ measures for tribal cultural resources (EIR Section 4.18, presented below), but did not indicate whether or not the Project would have any specific impacts on any tribal cultural resources. The text of all tribal measures have been incorporated into the ~~four~~ seven measures recommended in this EIR (~~CUL-1 through CUL-3 and TCR-1 through TCR-4~~). The only change is all the measures now apply to both tribal groups as appropriate (i.e., in those measures where the specific tribes are named).

The Project will be required to comply with all applicable laws and regulations including if unanticipated Native American artifacts or resources are found during grading. The City General Plan contains eight standard conditions of approval for cultural resources (5.5-1 through 5.5-8). However, the four mitigation measures included in Impact TCR-2 below (MM TCR-1 through TCR-4) ~~and the three mitigation measures in Section 4.5, Cultural Resource, Impact CUL-2 (MM CUL-1 through CUL-3)~~ include equivalent procedures and requirements so no standard conditions will be applied in this case. The Project will have less than significant impacts in this regard under either the Phase 1 plus Phase 2A scenario or the Phase 1 plus Phase 2B scenario.

Section 4.19, Utilities and Service Systems, page 4.19-2, para 5, Electricity

Southern California Edison (SCE) is the primary electrical services provider to Rancho Cucamonga and the surrounding region. However, the Rancho Cucamonga Municipal Utility (RCMU) was established in 2001 as a City-owned utility company, enabling the City to handle potential energy issues at a local level. The utility currently only serves portions of the City. According to the RCMU Service Area map, the northern half of the Phase 1 site is listed as "Future Customer".² After discussion, SCE has agreed to serve the Project site while the RCMU will serve the new CVWD groundwater well site. However, Cucamonga Valley Water District Rancho Cucamonga Municipal Utility will operate and maintain the well.

Section 4.19, Utilities and Service Systems, page 4.19-2, add after para 6, Natural Gas

SoCalGas has natural gas facilities in all four streets bordering the Project site as well as to the existing buildings on the site at present. The City and the developer/applicant will contact 811 and/or DigAlert to identify the locations of existing gas lines prior to demolition and new construction on the Project site. The developer/applicant and/or the City as appropriate will reach out to the SoCal Gas Builder Services team to begin the application process for this project following certification of the EIR and approval of the requested land use entitlements.

DEIR Section 4.19.4, Utilities, Impacts and Mitigation (Water), page 4.19-13, paragraph 2

In addition, the WSA⁴ (Dudek 8.2023, page 12) indicates that MWD recently completed a water service reliability assessment and determined that it has supply capabilities sufficient to meet expected demands from 2025 through 2045 under a normal year, a single dry-year, and a period of drought lasting 5 consecutive water years. Since the MWD supplies imported water to the CVWD, the District (and indirectly the Project) is expected to have sufficient imported surface water supplies through 2045 under anticipated future drought conditions. This conclusion is supported by MWD's regional UWMP and the 2015 Integrated Water Resources Plan. Table 4.19-2 summarizes the water balance analysis presented in the WSA which demonstrates there will be adequate water supplies to serve the Project through 2045 under multiple drought scenarios (i.e., large surplus after deducting Project consumption from future UWMP supply/demand surplus through 2045 even after 5 years of drought)...According to CVWD staff¹¹, the CVWD has sufficient water supplies to serve the proposed Project (with the planned onsite well) and no new or

expanded water entitlements will be required. Relative to the new water well, the CVWD will need to apply to the State Water Resources Control Board, Division of Drinking Water (DDW), for approval of a domestic water supply permit amendment of a new source (well) and possible treatment changes per Cal. Code Regs. § 64556.

DEIR Section 4.19.4, Utilities, Impacts and Mitigation, page 4.19-15, entire page

Table 4.19-2: Water Supply Assessment – Drought Conditions Analysis

Year	Supply/ Demand	Projected Water Supply and Demand (acre-feet/year)				
		2025	2030	2035	2040	2045
First Year	CVWD Supply Totals	60,708	65,708	67,358	68,733	68,733
	CVWD Demand Totals	56,508	61,508	63,158	64,533	64,533
	Project Water Demand	NA	773	863	863	863
	Existing Water Usage	NA	14.5	14.5	14.5	14.5
	Difference	4,200	3,441.5	3,351.5	3,351.5	3,351.5
Second Year	CVWD Supply Totals	63,297	68,509	70,229	71,662	71,662
	CVWD Demand Totals	58,897	64,109	65,829	67,262	67,262
	Project Water Demand	NA	~~774~~ 773	863	863	863
	Existing Water Usage	NA	14.5	14.5	14.5	14.5
	Difference	4,400	~~3,640.5~~ 3,641.5	3,351.5	3,351.5	3,351.5
Third year	CVWD Supply Totals	64,924	70,271	72,035	73,506	73,506
	CVWD Demand Totals	60,424	65,771	67,535	69,006	69,006
	Project Water Demand	NA	~~774~~ 773	863	863	863
	Existing Water Usage	NA	14.5	14.5	14.5	14.5
	Difference	4,500	~~3,740.5~~ 3,741.5	3,651.5	3,651.5	3,651.5
Fourth Year	CVWD Supply Totals	57,077	61,774	63,323	64,615	64,615
	CVWD Demand Totals	53,077	57,774	59,923	60,615	60,615
	Project Water Demand	NA	~~774~~ 773	863	863	863
	Existing Water Usage	NA	14.5	14.5	14.5	14.5
	Difference	4,000	~~3,240.5~~ 3,241.5	3,151.5	3,151.5	3,151.5
Fifth Year	CVWD Supply Totals	46,852	50,707	51,978	53,038	53,038
	CVWD Demand Totals	43,552	47,407	48,678	49,738	49,738
	Project Water Demand	NA	~~774~~ 773	863	863	863
	Existing Water Usage	NA	14.5	14.5	14.5	14.5
	Difference	3,300	~~2,540.5~~ 2,541.5	~~2,451.5~~ 2,541.5	~~2,451.5~~ 2,541.5	~~2,451.5~~ 2,541.5

Source: Table 7-8, WSA, Dudek, ~~August 2023~~ ~~May 2023~~ NA = Not Applicable

DEIR Section 5, Alternatives to the Proposed Project

[NOTE 1: Any references in the Alternatives section to the Master Plan also includes the added land use notation from RCDC Sections 17.130.040 and 17.138.020, which requires certain ground-floor uses along corridor frontages and projects with the Mixed Employment 2 (ME-2) zoning designation]

NOTE 2: During circulation of the Draft EIR it was determined the calculations used to characterize Phase 1 and Phase 2 emissions of the Project relative to VOC, NOx, and greenhouse gases in the Alternatives Section needed to be updated to match DEIR Sections 4.3 and 4.8. These same factors were correct in Section 4.3, Air Quality, and 4.8, Greenhouse Gas Emissions, so no tables in those sections required changes. However, the following tables in the alternatives analysis are revised as shown below:

Table 5.5-1: Air Quality Impacts - Alternative 1 (Revised)

Source	Maximum Daily Pollutant Emissions (Pounds Per Day) ^(A)					
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Proposed Project						
Phase 1 <u>Operational</u> Emissions ^(A)	34.2 20.9	189.0 159.4	232.9 260.9	1.6 2.2	67.1 62.8	19.9 26.4
SCAQMD CEQA Threshold	55	55	550	150	150	55
Threshold Exceeded?	No	Yes	No	No	No	No
Phase 2 <u>Operational</u> Emissions ^{(A)(B)}	25.6 100.6	181.6 984.7	163.6 468.0	1.6 2.5	67.0 69.5	19.9 33.0
SCAQMD CEQA Threshold	55	55	550	150	150	55
Threshold Exceeded?	No Yes	Yes	No	No	No	No
Alternative 1 – Expand Existing Uses						
Operational Emissions ^{(A)(C)}	19.7	104.0	126.0	0.9	36.1	10.7
SCAQMD CEQA Threshold	55	55	550	150	150	55
Threshold Exceeded?	No	Yes	No	No	No	No
Source: Phase 1 emissions from DEIR Table 4.3-36 and Phase 2 <u>operational</u> emissions from DEIR Table 4.3-2737						
(A) Maximum daily VOC, CO, SO _x , PM ₁₀ , and PM _{2.5} emissions occur during the summer. Maximum daily NO _x emissions occur during the winter.						
(B) Phase 1 plus Phase 2A as it has more square feet of development than Phase 2B so it is the larger impact estimate						
(C) Approximately 55% (or -45%) of proposed Project emissions						

Table 5.5-4: Project Operation GHG Emissions – Alternative 1 (Revised)

Operational Source ¹	Annual GHG Emissions (MT / Year)				
	CO ₂	CH ₄	N ₂ O	Refrigerant (CO ₂ e)	CO ₂ e
Project (Phase 1 + 2B total with new construction and cogen - <u>existing</u>)					
Total Emissions	43,840.0	15.7	2.6	30.0	40,965.7 44,082.0
SCAQMD Threshold					10,000
Exceeds Threshold?					Yes
Alternative 1 Operation ²					
Total Emissions	15,261.4	11.5	1.9	22.1	15,295.0
SCAQMD Threshold					10,000
Exceeds Threshold?					Yes
Source: Table 4.8-10 7 for Phase 1 and Table 4.8-9 for Phase 2 NET operational values with mitigation					

1 Net emissions which include subtracting emissions from operation of existing onsite land uses and implementation of recommended mitigation measures including applicable cap and trade covered emissions

2 Assumes approximately 55% (-45%) of total operational emissions from the proposed Project (Phase 1 and 2A) but assumes 1 phase for Alternative 1 based on a CalEEMod run for all 3 Alternatives

Table 5.6-1: Air Quality Impacts - Alternative 2 (Revised)

Source	Maximum Daily Pollutant Emissions (Pounds Per Day) ^(A)					
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Proposed Project (Net)						
Phase 1 Emissions ^(A)	34.2 ~~20.9~~	189.0 ~~159.4~~	232.9 ~~260.9~~	1.6 ~~2.2~~	67.1 ~~62.8~~	19.9 ~~26.4~~
SCAQMD CEQA Threshold	55	55	550	150	150	55
Threshold Exceeded?	No	Yes	No	No	No	No
Phase 2 Emissions ^{(A)(B)}	25.6 ~~100.6~~	181.6 ~~984.7~~	163.6 ~~468.0~~	1.6 ~~2.5~~	67.0 ~~69.5~~	19.9 ~~33.0~~
SCAQMD CEQA Threshold	55	55	550	150	150	55
Threshold Exceeded?	~~No~~ Yes	Yes	No	No	No	No
Alternative 2 – Reduced Intensity						
Operational Emissions ^{(A)(C)}	34.1	148.9	190.9	1.8	59.5	23.7
SCAQMD CEQA Threshold	55	55	550	150	150	55
Threshold Exceeded?	No	Yes	No	No	No	No
Source: Phase 1 emissions from DEIR Table 4.3-36 and Phase 2 operational emissions from DEIR Table 4.3-27 ~~37~~						
(A) Maximum daily VOC, CO, SO _x , PM ₁₀ , and PM _{2.5} emissions occur during the summer. Maximum daily NO _x emissions occur during the winter.						
(B) Phase 1 plus Phase 2A as it has more square feet of development than Phase 2B so it is the larger impact estimate						
(C) Approximately 75% (or -25%) of proposed Project emissions using a CalEEMod printout for this specific Alternative						

Table 5.6-4: Project Operation GHG Emissions – Alternative 2 (Revised)

Operational Source ^(A)	Annual GHG Emissions (MT / Year)				
	CO ₂	CH ₄	N ₂ O	Refrigerant (CO ₂ e)	CO ₂ e
Project (Phase 1 + 2B total with new construction and cogen - <u>existing</u>)					
Total Emissions	43,840.0 ~~44,082.0~~	15.7 ~~2.6~~	2.6 ~~30.0~~	30.0 ~~40,965.7~~	40,965.7 ~~44,082.0~~
SCAQMD Threshold					10,000
Exceeds Threshold?					Yes
Alternative 2 Operation					
Total Emissions ^(B)	34,723.0	10.4	1.6	18.0	34,753.0
SCAQMD Threshold					10,000
Exceeds Threshold?					Yes
Source: Table 4.8-10 ~~7~~ for Phase 1 and Table 4.8-9 for Phase 2 NET operational values with mitigation					

(A) Net emissions which include subtracting emissions from operation of existing onsite land uses and implementation of recommended mitigation measures including applicable cap and trade covered emissions

(B) Assumes 75% (-25%) for operational emissions of the proposed Project (combined both phases) but assumes 1 phase for the alternative

Table 5.7-1: Air Quality Impacts - Alternative 3 (Revised)

Source	Maximum Daily Pollutant Emissions (Pounds Per Day) ^(A)					
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Proposed Project (Net)						
Phase 1 Emissions ^(A)	34.2 ~~20.9~~	189.0 ~~159.4~~	232.9 ~~260.9~~	1.6 ~~2.2~~	67.1 ~~62.8~~	19.9 ~~26.4~~
SCAQMD CEQA Threshold	55	55	550	150	150	55
Threshold Exceeded?	No	Yes	No	No	No	No
Phase 2 Emissions ^{(A)(B)}	25.6 ~~100.6~~	181.6 ~~984.7~~	163.6 ~~468.0~~	1.6 ~~2.5~~	67.0 ~~69.5~~	19.9 ~~33.0~~
SCAQMD CEQA Threshold	55	55	550	150	150	55
Threshold Exceeded?	No ~~Yes~~	Yes	No	No	No	No
Alternative 3 – Mixed Use						
Operational Emissions ^{(A)(C)}	141.0	143.0	1,285.0	3.24	283.0	73.4
SCAQMD CEQA Threshold	55	55	550	150	150	55
Threshold Exceeded?	Yes	Yes	Yes	No	Yes	Yes
Source: Phase 1 emissions from DEIR Table 4.3-36 and Phase 2 operational emissions from DEIR Table 4.3-27 ~~37~~						
(A) Maximum daily VOC, CO, SO _x , PM ₁₀ , and PM _{2.5} emissions occur during the summer. Maximum daily NO _x emissions occur during the winter.						
(B) Phase 1 plus Phase 2A as it has more square feet of development than Phase 2B so it is the larger impact estimate						
(C) Approximately 90% (or -10%) of proposed Project emissions based on a CalEEMod printout for this specific alternative.						

Table 5.7-4: Project Operation GHG Emissions – Alternative 3 (Revised)

Operational Source ^(A)	Annual GHG Emissions (MT / Year)				
	CO ₂	CH ₄	N ₂ O	Refrigerant (CO ₂ e)	CO ₂ e
Project (Phase 1 + 2B total with new construction and cogen - <u>existing</u>)					
Total Emissions	43,840.0	15.7	2.6	30.0	40,965.7 ~~44,082.0~~
SCAQMD Threshold					10,000
Exceeds Threshold?					Yes
Alternative 3 Operation					
Total Emissions ^(B)	49,910.9	19.1	5.3	33.0	49,968.3
SCAQMD Threshold					10,000
Exceeds Threshold?					Yes
Source: Table 4.8-10 ~~7~~ for Phase 1 and Table 4.8-9 for Phase 2 NET operational values with mitigation					

(A) Net emissions which include subtracting emissions from operation of existing onsite land uses and implementation of recommended mitigation measures including applicable cap and trade covered emissions

(B) Assumes 1100% (+10%) for operational emissions of the proposed Project (combined both phases) based on the results of a CalEEMod printout specifically for this alternative.

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4.0 PUBLIC CIRCULATION

Availability and Distribution

The Notice of Preparation (NOP) was submitted to the State Clearinghouse for distribution to State agencies on the standard notification list maintained by the City of Rancho Cucamonga Community Development Department. The NOP was actually circulated twice and each for a 30-day public review period, the first time was from August 17, 2023 to September 16, 2023 and the second time was from September 13, 2023 to October 23, 2023. The NOP was electronically filed twice with the State Clearinghouse on August 17, 2023 and September 14, 2023. It was available on the City's website during the entire NOP public review period (see Appendix A of the Draft EIR).

An in-person Scoping Meeting was held on August 13, 2023 for public agencies and the public to ask questions about the EIR and provide input as to important issues that should be addressed in the EIR (see Appendix A of the Draft EIR).

The Notice of Availability (NOA) for the Draft EIR was distributed on April 24, 2025 to all agencies and other entities on the standard notification list via certified mail (see below) and was posted to the San Bernardino County Clerk of the Board and published in the Inland Valley Daily Bulletin on April 29, 2025 (see Appendix A of the Final EIR). The NOA was sent to the same agencies and entities that received notification of the NOP. The NOA was sent to government agencies, neighboring cities, and non-governmental interested parties. The NOA and Notice of Completion (NOC) were both submitted electronically to the State Clearinghouse for distribution to State agencies. The NOA and DEIR materials were also available on the City's website during the entire DEIR review period and hard copies of the DEIR and electronic versions of the appendices were available at the local library and City Planning Department office at City Hall. Notification was also submitted to local Native American Tribal Governments in accordance with CEQA statutes, guidelines, and Assembly Bill (AB) 52 (see Appendix B of the Draft EIR).

Agency Distribution List Recipients

Federal Agencies

U.S. Fish and Wildlife Service

State of California (per NOC through State Clearinghouse)

State Clearinghouse
California Geological Survey
Department of Transportation (Caltrans) District 8 – Riverside/San Bernardino Counties
Native American Heritage Commission
Regional Water Quality Control Board - Region 8 – Santa Ana
Department of Toxic Substances Control
Department of Fish and Wildlife – Region 6 - Inland Desert

San Bernardino County

County Clerk of the Board
Department of Public Works
Flood Control District
Local Agency Formation Commission (LAFCO)
Planning Department
Sheriff's Department – Rancho Cucamonga Substation

Regional

San Bernardino Council of Governments
Santa Ana Regional Water Quality Control Board
Southern California Association of Governments
South Coast Air Quality Management District CEQA – Inter-Governmental Review Group

Local Cities

City of Fontana Planning Department
City of Ontario Planning Department
City of Upland Development Services

Transportation

Metrolink Planning and Development Office

Education

Alta Loma School District
Central School District
Chaffey Community College District
Chaffey Joint Union High School District
Cucamonga School District
Etiwanda School District
Fontana Unified School District

Utilities/Services

Cucamonga Valley Water District
Inland Empire Utilities Agency
Rancho Cucamonga Fire Protection District
Southern California Edison
Southern California Gas Company
Spectrum
Verizon Business Office
West Valley Detention Center

Community Groups/Other Groups/Individuals

Adam Salcido
Adams Broadwell Joseph & Cardozo
Advocates for the Environment
CREED LA
Golden State Environmental Justice Alliance
Habitat Defense Council
Lozeau Drury LLP
Mary Ann Ruiz
Michael Tsai, Attorney at Law

5.0 MITIGATION MONITORING & REPORTING PLAN (MMRP)

This Mitigation Monitoring and Reporting Program (MMRP or Program) identifies Mitigation Measures incorporated into the El Camino Project Draft EIR for the City of Rancho Cucamonga. For each Mitigation Measure, the MMRP identifies the significant impact, the related mitigation measure, the implementation entity, the monitoring and verification entity, and timing requirements.

Authority

This MMRP has been prepared pursuant to Section 21081.6 of the California Environmental Quality Act (CEQA)(Public Resources Code Sections 21000 et seq.), and the State CEQA Guidelines (14 Cal. Code Regs. Sections 15000 et seq.) Sections 15091(d) and 15097, to ensure implementation of and provide for the monitoring of mitigation measures required of the El Camino Project (Project) as set forth in the Final Environmental Impact Report (FEIR) prepared for the Project. The report will be kept of file in the Planning office of the CEQA Lead Agency, the City of Rancho Cucamonga (City).

As noted in the EIR, the Project has been designed to reduce or avoid adverse environmental impacts through the implementation of a number of Project Design Features (PDFs) as well as a number of standard Conditions of Approval (COAs) as developed by the City. When significant impacts were still identified even after implementation of PDFs and COAs, the EIR identified a number of mitigation measures to avoid or substantially lessen significant environmental impacts. The MMRP outlined in matrix Table 5-1 below is designed for the City to monitor and ensure implementation of all mitigation measures that are adopted for the Project.

The City is the Lead Agency for the Project and assumes ultimate enforcement responsibilities for implementation of all mitigation measures listed in this Program. The City may assign responsibility for implementation or monitoring to appropriate designees such as a construction manager or third-party monitor. However, as the Lead Agency, the City remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with this Program. In some cases, the Project or the City is required to secure permits or approvals from third party agencies in order to implement a mitigation measure. In these cases, the City is responsible for verifying that such permits or approvals have been obtained in accordance with the conditions stipulated in the mitigation measure. The City's existing planning, engineering, operations, and procurement review and inspection processes will be used as the basic foundation for the Program procedures and will also serve to provide the documentation for the reporting Program.

Monitoring Schedule

Prior to construction, while detailed design plans are being programs the applicant/developer, City staff will be responsible for ensuring compliance with mitigation monitoring applicable to the Project construction, development, and design phases. Once construction has begun and is underway, monitoring of the mitigation measures associated with construction will be included in the responsibilities of City staff who shall prepare, or cause to be prepared, periodic monitoring reports as appropriate. Regulatory agencies will have to coordinate CEQA mitigation and regulatory permit conditions and monitoring/reporting as part of their regulatory permitting process

and will likely require submittal of formal monitoring reports. Once construction has been completed, the City will monitor the Project as specified in the mitigation measures.

Support Documentation

Findings and related documentation supporting the findings involving modifications to mitigation measures shall be maintained in the Project file with the Program and shall be made available to the public upon request.

Format of Mitigation Monitoring Matrix (FEIR Table 5-1)

The mitigation monitoring matrix (FEIR Table 5-1) identifies the environmental issue areas for which monitoring is required, the required mitigation measures, the time frame for monitoring, and the agency or organization responsible for implementing and monitoring the measures.

Definitions

Acronym	Definition
ACM	Asbestos-Containing Material
CDFW	California Department of Fish and Wildlife
COA	Condition of Approval
dBA	Decibel (measure of sound pressure) on the A-weighted scale
DPM	Diesel Particulate Matter
DTSC	(State) Department of Toxic Substances Control
EV	Electric Vehicle
EVCS	Electric Vehicle Charging Station
EVSC	Electric Vehicle Supply Equipment
FAA	Federal Aviation Administration
GHG	Greenhouse Gas
LBP	Lead-Based Paint
Leq	Noise Equivalent Level
NOx	Oxides of Nitrogen
NZEV	Near Zero Emission Vehicle
ONT	Ontario International Airport
QEP	Qualified Environmental Professional
SCAQMD	South Coast Air Quality Management District
TDM	Transportation Demand Management
TRU	Transport Refrigeration Unit
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compound
ZEV	Zero Emission Vehicle

Table 5-1: Mitigation Monitoring and Reporting Program

IDENTIFIED IMPACT	RELATED MITIGATION MEASURE ¹	CITY MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Initials	Date
AIR QUALITY						
Consistency with SCAQMD Air Quality Management Plan. Cumulatively Considerable Net Increase of Criteria Pollutants. Cause substantial adverse cumulative air quality impacts.	AIR-2A: Reduce Construction VOC Emissions. To reduce construction-related emissions of volatile organic compounds (VOCs), the City shall require the applicant to implement the following measures during all Phase 1 and Phase 2 construction activities: 1) Use architectural coatings that meet the South Coast Air Quality Management District's (SCAQMD) "Super Compliant" VOC standard of 10 grams/liter or less for all interior and exterior primer, sealer, paint, and other coating applications for which a super compliant product is commercially available. a) If feasible given contract, logistical, and other construction factors, avoid painting during peak smog season (July, August, and September) if super compliant coatings are not commercially available. 2) Keep all coating containers closed when not in use to prevent VOC emissions. 3) Keep all paint and solvent laden rags and other materials in sealed containers to prevent VOC emissions. 4) Clean up water-based paints with water only and when possible do not rinse clean-up water down the drain, onto the ground, or into a storm drain.	Project Applicant	City Construction Inspector(s)	During all construction activities		

Table 5-1: Mitigation Monitoring and Reporting Program

IDENTIFIED IMPACT	RELATED MITIGATION MEASURE ¹	CITY MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Initials	Date
	5) Use SCAQMD compliant Clean Air Solvents to clean paint application equipment. 6) Recycle leftover paint.					
Consistency with SCAQMP Air Quality Management Plan. Cumulatively Considerable Net Increase of Criteria Pollutants. Cause substantial adverse cumulative air quality impacts.	AIR-2B: Reduce Construction NOx and PM Exhaust Emissions. To reduce construction-related exhaust emissions of oxides of nitrogen (NOx) and particulate matter (PM), including diesel particulate matter (DPM), the City shall require the applicant to implement the following measures during all Phase 1 and Phase 2 construction activities: 1) Connect to existing electrical service to power construction trailers and stationary and portable equipment (e.g., pumps, generators, compressors, and welding sets). This measure shall be subject to the approval of the local electric utility. If it is not feasible to connect to electrical service and/or extend electrical service to all work sites, biodiesel (no more than B20 blend), renewable diesel, or propane shall be used to power stationary and portable equipment provided the use of such fuels is allowed pursuant to manufacturer's specifications. The use of stationary or portable diesel-fueled equipment shall be prohibited in the project area unless electrical service is denied, alternative fuels are not permitted by the manufacture for the specific equipment in use, and there are no alternative equipment types capable of	Project Applicant	City Construction Inspector(s)	During all construction activities		

Table 5-1: Mitigation Monitoring and Reporting Program

IDENTIFIED IMPACT	RELATED MITIGATION MEASURE ¹	CITY MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Initials	Date
	being powered by alternative fuels that can be used instead of the standard diesel-fueled equipment. 2) All construction equipment with a rated power-output of 50 horsepower (hp) or greater shall be certified to meet U.S. Environmental Protection Agency (EPA) Tier 4 Final nonroad diesel engine emissions standards for NO_x and PM₁₀, or be retrofitted with California Air Resources Board (CARB)-verified diesel emissions control strategies capable of reducing exhaust NO_x and PM₁₀ emissions to levels that meet Tier 4 Final emissions standards, unless the applicant submits evidence to the City that specific equipment meeting this requirement is not available on loan, rent, or other terms of use within 200 miles of the city. In this instance, the next highest available emissions tier (e.g., Tier 4 Interim, Tier 3) for the specific equipment in question shall be required. 3) Limit idling of diesel-powered construction equipment, vendor delivery trucks, and hauling trucks to no more than two minutes unless manufacturer's specifications specifically require main engine idling is necessary to maintain equipment in good working order.					

Table 5-1: Mitigation Monitoring and Reporting Program

Consistency with SCAQMP Air Quality Management Plan. Cumulatively Considerable Net Increase of Criteria Pollutants. Cause substantial adverse cumulative air quality impacts.	AIR-2C: Reduce Light-duty Vehicle Trip Emissions. To reduce light duty vehicle trip emissions (i.e., passenger cars and pick-up trucks with a gross vehicle weight rating of 8,500 pounds or less), the City shall require the applicant to comply with the voluntary Tier 1 designated parking for clean air vehicles and electric vehicle (EV) charging provisions contained in the version of the California Green Building Code (CalGreen Code) that is in effect at the time of building permit approval, unless the City has adopted local requirements that are more stringent than the CalGreen Code. As of January 1, 2025, the 2022 CalGreen Code includes the following voluntary clean air vehicle parking and EV charging provisions for non-residential projects: 1) Designated Parking for Clean Air Vehicles Tier 1 Provisions (CalGreen Code Section A5.106.5.1): The number of combined designated parking spaces for a zero-emitting, fuel-efficient, and car/vanpool vehicles shall be 35% of the total number of parking spaces provided by the project. Based on the project's current proposed 521 parking spaces, the total number of clean air vehicle designated parking spaces for the project equals 182 spaces. 2) EV Charging Tier 1 Provisions (CalGreen Code Section A5.106.5.3): The number of EV capable spaces, and EV capable spaces with electric vehicle supply equipment (EVSE), which creates an electric vehicle charging station (EVCS) shall be determined based on the total number of actual parking spaces as set forth in CalGreen Code Table A5.106.5.3.1. Based on the project's current proposed number of 521 parking spaces:	Project Applicant	City Inspector(s)	During all operations		
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Table 5-1: Mitigation Monitoring and Reporting Program

IDENTIFIED IMPACT	RELATED MITIGATION MEASURE ¹	CITY MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Initials	Date
	a) The number of EV capable spaces shall be 30% of the total parking spaces provided. Based on the project's current proposed 521 parking spaces, the total number of EV capable spaces for the project equals 157 spaces. b) The number of EV capable spaces provided with EVSE shall be 33% of the number of EV capable spaces provided by the project. Based on the project's estimated total number of EV capable spaces for the project (157, see subsection a) above), the number of EV capable spaces with EVSE for the project equals 52 spaces (assuming all EVSE are level 2 charging equipment). The spaces with EVSE count towards the total number EV capable spaces required by subsection a) above. The EVSE may be any combination of level 2 and direct current fast charging equipment as permitted by CalGreen Code Section 5.106.5.3.2 (EVCS), and the EVCS may be managed by an automatic load management system (ALMS) in accordance with CalGreen Code Section 5.106.5.3.3 (ALMS).					

Table 5-1: Mitigation Monitoring and Reporting Program

Consistency with SCAQMP Air Quality Management Plan. Cumulatively Considerable Net Increase of Criteria Pollutants. Cause substantial adverse cumulative air quality impacts.	AIR-2D: Prepare VMT/TDM Reduction Plan (SAME AS TRA-1). The proposed project shall implement a commute trip reduction program consisting of transportation demand management (TDM) measures that achieve a minimum VMT reduction of 4.9 percent. The VMT reduction associated with the TDM measures to be implemented shall be quantified in accordance with the California Air Pollution Control Officers Association <i>Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity, Designed for Local Governments, Communities, and Project Developers</i> (December 2021). Per General Plan Condition of Approval (COA) 5.17-3, the project shall provide but is not limited to the following as determined applicable by City staff: 1) Provide car-sharing, bike sharing, or ride-sharing programs; 2) Improve or increase access to transit; 3) Include project measures to reduce transportation requirements such as work from home and flexible work schedules; 4) Link to existing pedestrian or bicycle networks, or transit service; and/or 5) Provide traffic calming where applicable. Alternatively, the project may participate in a regional VMT mitigation exchange/banking program (if one has been established) to reduce VMT from the project or other land uses to achieve stated levels. Within one year of Phase 2 becoming fully operational, the developer must demonstrate a project trip reduction of at least 4.9% from estimated trips based on implementation of the	Project Applicant	City Planning Department	Within one year of Phase 2 becoming fully operational submit 1st annual report Submit annual reports thereafter documenting ongoing compliance		
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Table 5-1: Mitigation Monitoring and Reporting Program

IDENTIFIED IMPACT	RELATED MITIGATION MEASURE ¹	CITY MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Initials	Date
	actions and programs outlined in this mitigation measure. If the 4.9% reduction cannot be demonstrated at that time, the project shall expand its VMT program offerings or participate in a regional VMT mitigation bank if such a program is available to achieve the 4.9% reduction goal. The project shall submit annual reports to the City to demonstrate ongoing compliance with this project VMT reduction goal.					

Table 5-1: Mitigation Monitoring and Reporting Program

Consistency with SCAQMP Air Quality Management Plan. Cumulatively Considerable Net Increase of Criteria Pollutants. Cause substantial adverse cumulative air quality impacts.	AIR-2E: Reduce Truck Trip Emissions. To reduce truck trip emissions (i.e., light-heavy, medium-heavy, and heavy-heavy duty trucks with a gross vehicle weight of 8,501 pounds or greater) and promote the use of near-zero emission (NZE) and zero emission vehicles (ZEV), the City shall require the applicant to: 1) Exceed the mandatory electric vehicle (EV) charging readiness requirements for planned off-street loading spaces specified in the version of the California Green Building Code (CalGreen Code) that is in effect at the time of building permit approval, unless the City has adopted local requirements that are more stringent than the CalGreen Code. As of January 1, 2025, the 2022 CalGreen Code, Section 5.106.5.4 (EV charging: medium-duty and heavy-duty), specifies minimum power requirements for dedicated branch circuits, reserved locations for medium and heavy-duty ZEV charging cabinets and conduit routing, and sufficiently sized raceways and busways between electrical service panels and ZEV charging areas. Therefore, the City shall require the applicant to: a) Design and include sufficient space for the transformer, main service equipment, and cabinets/subpanels necessary to accommodate a sufficient number of branch circuits to provide future installation of electric vehicle service equipment (EVSE) <u>to service all onsite electric trucks, at all truck docks and main truck parking areas.</u> b) Design and incorporate a sufficient number of raceways/busways to provide	Project Applicant	City Inspector(s)	During all operations		
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Table 5-1: Mitigation Monitoring and Reporting Program

	future EVSE installation at all truck docks and main truck parking areas. c) Dedicate/preserve convenient locations near all truck docks and main truck parking areas for the future installation of EVSE and reserve pathways for conduits needed to connect the EVSE <u>to service all onsite electric trucks</u> ~~to other electrical service equipment (e.g., raceway, cabinet, etc.)~~ d) <u>Install EVSE onsite equal to at least 10% of the total truck docks included in the final Project design. Based on the project's estimated total number of truck docks (57, see subsection a) above), the number of onsite EVSE for the project equals six (6).</u> 2) Transport Refrigeration Unit (TRU) Restrictions: The applicant shall ~~limit~~ ~~prohibit~~ the use of diesel fueled TRUs on-site. All TRUs operated at the site shall be <u>either powered by electricity or limited to no more than two TRU trucks per month operating onsite.</u> 3) Idling Signage: Signs shall be posted at all truck access gates and loading dock areas reminding drivers of idling limitations. The signs shall be clearly visible, readable at a distance of 10 feet, and notify truck drivers that: a) The vehicle's primary diesel engine shall be turned off when not in use. b) The vehicle's primary diesel engine shall not idle for more than 5 consecutive minutes at any location pursuant to Title					
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Table 5-1: Mitigation Monitoring and Reporting Program

IDENTIFIED IMPACT	RELATED MITIGATION MEASURE ¹	CITY MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Initials	Date
	13 of the California Code of Regulations, Section 2485. 4) <u>EV Fleet Vehicles: In addition to EV charging readiness infrastructure measures, the applicant shall incorporate, and use for distribution, at least 8 zero emission, or near zero emission, on-road haul trucks in its proprietary vehicle fleet within the first year of operations after receiving a certificate of occupancy.</u> 5) <u>Incentive Funding: To support the accelerated deployment of zero emission (ZE) and near zero emission (NZE) truck technologies, the City shall require the applicant to provide operators of third-party diesel-fueled trucks accessing the site information on the California Air Resources Board's Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project (HVIP), such as the HVIP website or handouts summarizing HVIP details, frequently asked questions, etc.</u>					

Table 5-1: Mitigation Monitoring and Reporting Program

IDENTIFIED IMPACT	RELATED MITIGATION MEASURE ¹	CITY MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Initials	Date
Consistency with SCAQMP Air Quality Management Plan. Cumulatively Considerable Net Increase of Criteria Pollutants. Cause substantial adverse cumulative air quality impacts	AIR-2F: Reduce Service Equipment Emissions. To reduce service equipment emissions (i.e., yard hostlers, yard equipment, forklifts, and pallet jacks) and promote the use of near-zero emission, and zero emission equipment, the City shall require the applicant to utilize 100% electric or similar near-zero and zero emission, forklifts, sweeper/scrubbers, aerial lifts, and yard trucks within the first operational year of the project, and continuing thereafter.	Project Applicant	City Inspector(s)	During all operations		
BIOLOGICAL RESOURCES						

Table 5-1: Mitigation Monitoring and Reporting Program

IDENTIFIED IMPACT	RELATED MITIGATION MEASURE ¹	CITY MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Initials	Date
Impacts on candidate, sensitive, or special status species Interfere with wildlife movement or migration corridors	BIO-1: Nesting Bird Survey. Bird nesting season generally extends from February 1 through August 31 in southern California. To avoid impacts to nesting birds (common and special-status) during the nesting season, a qualified avian biologist will conduct a pre-construction nesting bird survey three (3) days prior to project-related disturbance to identify any active nests. If no active nests are found, no further action will be required. If an active nest is found, the biologist will set appropriate no-work buffers around the nest which will be based upon the nesting species, its sensitivity to disturbance, nesting stage and expected types, intensity and duration of disturbance. The nests and buffer zones shall be field checked weekly by a qualified biological monitor. The approved no-work buffer zone shall be clearly marked in the field, within which no disturbance activity shall commence until the qualified biologist has determined the young birds have successfully fledged and the nest is inactive. This measure shall be implemented to the satisfaction of the City Community Development Director.	Project Biologist	City Planning Department	3 days prior to the start of grading		

Table 5-1: Mitigation Monitoring and Reporting Program

IDENTIFIED IMPACT	RELATED MITIGATION MEASURE ¹	CITY MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Initials	Date
Impacts on candidate, sensitive, or special status species Interfere with wildlife movement or migration corridors	BIO-2: Burrowing Owl Survey. A pre-construction clearance survey for burrowing owl shall be conducted accordance with the Staff Report on Burrowing Owl Mitigation³ (California Department of Fish and Wildlife 2012) prior to ground disturbance to ensure burrowing owl remain absent from the project site. If burrowing owls are found to occupy the project site during the pre-construction clearance survey, a burrowing owl relocation plan will need to be prepared and approved by CDFW prior to the commencement of any ground disturbing activities. The burrowing owl relocation plan shall outline recommended methods proposed to relocate the burrowing owls from the project site and provide measures that will be implemented for the maintenance, monitoring, and reporting of the relocated burrowing owls to increase chances of survivorship and better ensure compliance with CDFW guidelines. This plan should be implemented during the non-breeding season, and prior to seasonal rains to promote the best outcome for conservation of the burrowing owl. This measure shall be implemented to the satisfaction of the City Community Development Director.	Project Biologist	City Planning Department	3 days prior to the start of grading		
GREENHOUSE GAS EMISSIONS						
Generate significant GHG emissions on a direct, indirect, or cumulative basis	GHG-1: Reduce Appliance Energy Consumption and GHG Emissions. To reduce GHG emissions from appliance-related energy consumption, the City shall require all applicant installed refrigerators, dishwashers, clothes	Project Applicant	City Construction Inspector(s)	During all construction activities		

Table 5-1: Mitigation Monitoring and Reporting Program

IDENTIFIED IMPACT	RELATED MITIGATION MEASURE ¹	CITY MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Initials	Date
	washers and dryers, and room air conditioners intended for employee use to be Energy Star certified products.					
Generate significant GHG emissions on a direct, indirect, or cumulative basis	GHG-2: Reduce Building Energy Consumption and GHG Emissions. To reduce GHG emissions associated with the performance of the building envelope and systems components covered by Title 24 of the California Code of Regulations, the City shall require all new construction and major renovations undertaken by the applicant to be designed to have a total energy design rating that is at least 5% less than the standard building design for Climate Zone <u>10</u> ~~45~~ . The energy budget for the standard design building and the energy budget for the proposed design building shall be determined in accordance with the definitions and approach set forth in the version of the Building Energy Efficiency Standards (Energy Code) that is in effect at the time of building permit approval (currently the 2022 Energy Code), unless the City has adopted local requirements that are more stringent than the Energy Code. The requirement to reduce a project's energy budget by 5% below the standard design building shall not apply if the Energy Code or the City has already established a zero net energy requirement for the standard design building.	Project Applicant	City Construction Inspector(s)	During all construction activities		
HAZARDS AND HAZARDOUS MATERIALS						
Create a significant hazard through reasonably	HAZ-1: Unanticipated Discovery of Hazardous Materials. Prior to issuance of a grading permit for Phase 1 and/or Phase 2, the project proponent shall retain a qualified environmental professional	Project QEP/Applicant	City Planning Department and City	Prior to issuance of any grading permits		

Table 5-1: Mitigation Monitoring and Reporting Program

IDENTIFIED IMPACT	RELATED MITIGATION MEASURE ¹	CITY MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Initials	Date
foreseeable upset and accident conditions	(QEP) experienced with remediating hazardous materials from infill urban construction sites. The QEP must be on-call and summoned to the site immediately if any potentially hazardous materials are found during grading. Grading must be halted within 100 feet of an area that appears to contain hazardous materials. The QEP will halt grading as necessary to effectively identify the potential contaminated materials, including directing any sampling and laboratory testing that may be required. If soils are found to be contaminated at levels that are only slightly in excess of applicable residential standards, the QEP shall exercise professional discretion and have the option to coordinate with the grading contractor and developer to either remove contaminated soil and/or mix the contaminated soil with clean soil from either onsite or offsite to dilute any contaminants to below applicable exposure standards for residential development. Remediated areas must be retested to assure potential contaminant levels are below applicable residential standards. The results of any testing shall be provided to the City or other agencies as appropriate. Any contaminated soil that must be removed from the site shall be done by a licensed contractor and hauled to a landfill approved for such materials. This measure shall be implemented to the satisfaction of the City Community Development Department.		Inspectors, as appropriate			

Table 5-1: Mitigation Monitoring and Reporting Program

IDENTIFIED IMPACT	RELATED MITIGATION MEASURE ¹	CITY MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Initials	Date
Create a significant hazard through reasonably foreseeable upset and accident conditions	HAZ-2: ACMs and LBP Survey. Prior to demolition of any structures on the project site in either Phase 1 or 2, the developer shall retain qualified licensed environmental contractor(s) to survey the existing onsite office and warehouse buildings and any related structures for asbestos-containing materials (ACMs) and Lead-Based Paints (LBPs). If the survey finds the presence of any ACMs or LBPs on the site, the contractor(s) shall follow all relevant guidance from affected regulatory agencies (e.g., CalEPA, SCAQMD, DTSC, County Health Department, etc.) in terms of safe removal and disposal of the contaminated materials as appropriate. The contractor(s) shall prepare and submit a final report to the City Community Development Department within 30 days after completion of demolition/removal for ACMs and LBPs on the project site.	Project QEP/Applicant	City Planning Department and City Inspectors, as appropriate	Prior to demolition of any onsite structures		
Result in a safety hazard or excessive noise for people from airport activities	HAZ-3: FAA Lighting Hazards. A minimum of 45 days prior to submittal of an application for a building permit for the project, the applicant shall consult with the City of Rancho Cucamonga Planning Department in order to ~~to determine whether any implementing project related vertical structures will encroach into the 100 to 1 imaginary surface surrounding the ONT. If it is determined that there will be an encroachment into the 100 to 1 imaginary surface, the applicant shall file a FAA Form 7460-1, Notice of Proposed Construction or Alteration. If FAA determines that the implementing development project would potentially be an obstruction unless reduced to a specified height, the applicant and the City~~	Project Applicant	City Planning Department	At least 45 days prior to submittal of a building permit application		

Table 5-1: Mitigation Monitoring and Reporting Program

IDENTIFIED IMPACT	RELATED MITIGATION MEASURE ¹	CITY MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Initials	Date
	~~Planning Division will work with FAA to resolve any adverse effects on aeronautical operations including any demonstrate the Project is consistent with FAA~~ lighting or other restrictions or prohibitions which may include but are not limited to the following: determine whether any implementing project-related vertical structures will encroach into the 100-to-1 imaginary surface surrounding the ONT. If it is determined that there will be an encroachment into the 100-to-1 imaginary surface, the applicant shall file a FAA Form 7460-1, Notice of Proposed Construction or Alteration. If FAA determines that the implementing development project would potentially be an obstruction unless reduced to a specified height, the applicant and the City Planning Division will work with FAA to resolve any adverse effects on aeronautical operations including any lighting or other restrictions or prohibitions which may include but are not limited to the following: a. Any use which would direct a steady light or flashing light of red, white, green, or amber colors associated with airport operations toward an aircraft engaged in an initial straight climb following takeoff or toward an aircraft engaged in a straight final approach toward a landing at an airport, other than an FAA-approved navigational signal light or visual approach slope indicator. b. Any use which would cause sunlight to be reflected towards an aircraft engaged in an initial straight climb following takeoff or towards an					

Table 5-1: Mitigation Monitoring and Reporting Program

IDENTIFIED IMPACT	RELATED MITIGATION MEASURE ¹	CITY MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Initials	Date
	aircraft engaged in a straight final approach towards a landing at an airport. c. Any use which would generate smoke or water vapor or which would attract large concentrations of birds, or which may otherwise affect safe air navigation within the area. d. Any use which would generate electrical interference that may be detrimental to the operation of aircraft and/or aircraft instrumentation. e. All retention and water quality basins shall be designed to dewater within 48 hours of a rainfall event.					
NOISE						
Exposure to Noise Levels in Excess of Standards	NOI-1: Reduce Construction Noise Levels. To reduce potential construction noise to levels that are consistent with the City's 70 dBA L_{eq} standard for commercial land uses, the City shall require the applicant and/or its designated contractor, contractor's representatives, or other appropriate personnel to implement the following measures during construction activities: 1. <i>Restrict Work Hours.</i> All construction-related work activities, including material deliveries, shall be subject to the requirements of Municipal Code Section 17.66.050(D)(4). Construction activities, including deliveries, shall only occur during the hours of 7:00 AM to 8:00 PM on weekdays and Saturday, and shall not occur on	Project Applicant	City Construction Inspector(s)	During all construction activities		

Table 5-1: Mitigation Monitoring and Reporting Program

IDENTIFIED IMPACT	RELATED MITIGATION MEASURE ¹	CITY MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Initials	Date
	Sunday. The applicant and/or its contractor shall post a sign at all entrances to the construction site informing contractors, subcontractors, construction workers, etc. of this requirement. 2. <i>Construction Staging and Equipment Noise Control Measures.</i> a) Construction site access and staging activities such as receipt of deliveries, equipment and material storage, etc., shall occur as far away as possible from occupied parts of land uses (e.g., buildings, outdoor areas) adjacent to the Project site given site and active work constraints. b) All stationary noise generating equipment shall be shielded and located as far as possible from adjacent land uses given site and active work constraints. Shielding may consist of trailers, stored materials, or a three- or four-sided enclosure provided the structure/barrier breaks the line of sight between the equipment and the receptor, provides for proper equipment ventilation and operations, and complies with all other applicable occupational safety and health requirements. c) Heavy equipment shall include standard noise suppression devices such as mullers, engine covers, and engine/mechanical isolators, mounts, etc. Equipment and noise suppression devices shall be maintained in accordance with manufacturer's recommendations while on-site.					

Table 5-1: Mitigation Monitoring and Reporting Program

IDENTIFIED IMPACT	RELATED MITIGATION MEASURE ¹	CITY MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Initials	Date
	d) Pneumatic tools shall include a suppression device on the compressed air exhaust. e) Connect to existing electrical service to power stationary and portable equipment (e.g., pumps, generators, compressors, and welding sets). This measure shall be subject to the approval of the local electric utility. 3. <i>Construction Activity Noise Control Measures:</i> a) Demolition Sequencing: Demolition/deconstruction activities shall be sequenced to take advantage of existing shielding/noise reduction provided by existing buildings, parts of buildings, and/or other structures (e.g., construction trailers), and shall use methods that minimize noise and vibration, such as sawing concrete blocks instead of crushing or other pulverization activities, unless there are project-specific technical and logistical constraints that require such activities. b) <i>Install Phase 1 Construction Noise Barrier.</i> During all Phase 1 demolition, site preparation, grading, structure foundation work (e.g., excavation, pad pour, etc.), paving, and well drilling activities, the applicant shall install and maintain a physical noise barrier along the portion of the southeast perimeter of the site from 6th Street north (i.e., adjacent to Utica Avenue) a distance of 500 feet. The barrier shall be installed at-grade (or mounted to structures located at-grade, such as a K-rail) and extend to a height of					

Table 5-1: Mitigation Monitoring and Reporting Program

IDENTIFIED IMPACT	RELATED MITIGATION MEASURE ¹	CITY MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Initials	Date
	at least six (6) feet above grade, except adjacent to the well drilling area, where the barrier shall extend to a height of 10 feet above grade, and shall consist of a solid material that is free of openings or gaps (other than weep holes) and that has a minimum rated transmission loss value of 25 dB adjacent to the well drilling area and 20 dB in all other areas. Potential materials that are capable of achieving required noise level reductions include nominal 0.5-inch plywood (20 dB), nominal 0.75-inch plywood (25 dB), commercially available acoustic panels, blankets, or other products, or any combination of noise barriers and commercial products that achieve a minimum transmission loss value of 20 dB or 25 dB as required. The barrier may be removed following the completion of all Phase 1 demolition, site preparation and grading, structure foundation, paving, and well drilling within the 7-acre southeast quadrant shown in EIR Exhibit 4.13-3. c) <i>Install Phase 2B Construction Noise Barrier.</i> During all Phase 2B demolition, site preparation, grading, structure foundation (e.g., excavation, pad pour, etc.), and paving work, the applicant shall install and maintain a physical noise barrier along the Phase 2B northern, eastern, and western boundary. The noise barrier shall be installed at-grade (or mounted to structures located at-grade, such as a K-rail) and shall extend to a height of at least six (6) feet above grade. The noise barrier shall consist of a solid material that is free of openings or gaps (other than weep holes) and has a minimum rated					

Table 5-1: Mitigation Monitoring and Reporting Program

IDENTIFIED IMPACT	RELATED MITIGATION MEASURE ¹	CITY MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Initials	Date
	transmission loss value of 20 dB. Potential materials that are capable of achieving required noise level reductions include nominal 0.5-inch plywood (20 dB), commercially available acoustic panels, blankets, or other products, or any combination of noise barriers and commercial products that achieve a minimum transmission loss value of 20 dB. The barrier may be removed following the completion of all Phase 2B demolition, site preparation and grading, structure foundation, and paving work.					
Create a substantial permanent increase in ambient noise levels in excess of City standards	NOI-2: Noise Verification Study. Prior to the issuance of any Phase 1 or Phase 2 grading permit for the project, the City shall review and approve a final noise analysis, prepared by or on behalf of the applicant, and based on the final project design, that: 1) Identifies the locations of the project's final exterior stationary equipment, including backup generators, and truck dock areas and any screening walls; and 2) Demonstrates the project's noise levels will not exceed the City's applicable industrial noise standards (as outlined in Development Code Section 17.66.110). The final analysis shall contain specific and verifiable information pertaining to the project's final site design and layout and equipment noise levels (e.g., manufacturer's specifications, empirical noise measurements). The analysis may be prepared for Phase 1, Phase 2, or combined Phase 1 and Phase 2 activities if final information is available.	Project Applicant	City Planning Department	Prior to issuance of any grading permit		

Table 5-1: Mitigation Monitoring and Reporting Program

IDENTIFIED IMPACT	RELATED MITIGATION MEASURE ¹	CITY MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Initials	Date
TRANSPORTATION						
Conflict with CEQA guidelines Section 15064.3(b) regarding Vehicle Miles Traveled (VMT) Cause substantial cumulative transportation impacts	TRA-1: VMT/TDM Reduction Plan. The proposed project shall implement a commute trip reduction program consisting of transportation demand management (TDM) measures that achieve a minimum VMT reduction of 4.9 percent. The VMT reduction associated with the TDM measures to be implemented shall be quantified in accordance with the California Air Pollution Control Officers Association <i>Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity, Designed for Local Governments, Communities, and Project Developers</i> (December 2021). Per General Plan Condition of Approval (COA) 5.17-3, the project shall provide but is not limited to the following as determined applicable by City staff: 1) Provide car-sharing, bike sharing, or ride-sharing programs; 2) Improve or increase access to transit; 3) Include project measures to reduce transportation requirements such as work from home and flexible work schedules; 4) Link to existing pedestrian or bicycle networks, or transit service; and/or 5) Provide traffic calming where applicable. Alternatively, the project may participate in a regional VMT mitigation exchange/banking	Project Applicant	City Planning Department	Within one year of Phase 2 becoming fully operational submit 1 st annual report Submit annual reports thereafter documenting ongoing compliance		

Table 5-1: Mitigation Monitoring and Reporting Program

IDENTIFIED IMPACT	RELATED MITIGATION MEASURE ¹	CITY MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Initials	Date
	program (if one has been established) to reduce VMT from the project or other land uses to achieve stated levels. Within one year of Phase 2 becoming fully operational, the developer must demonstrate a project trip reduction of at least 4.9% from estimated trips based on implementation of the actions and programs outlined in this mitigation measure. If the 4.9% reduction cannot be demonstrated at that time, the project shall expand its VMT program offerings or participate in a regional VMT mitigation bank if such a program is available to achieve the 4.9% reduction goal. The project shall submit annual reports to the City to demonstrate ongoing compliance with this project VMT reduction goal.					
TRIBAL CULTURAL RESOURCES						
Cause significant impacts to tribal cultural resources	TCR-1: Tribal Coordination. The Yuhaaviatam of San Manuel Nation Cultural Resources Department (San Manuel) and the Gabrieleno Band of Mission Indians – Kizh Nation (Gabrieleno) shall be contacted, as detailed in Mitigation Measure CUL-1 TCR-2, of any pre-contact and/or historic-era cultural resources discovered during project implementation and be provided information regarding the nature of the find, so as to provide Tribal input with regards to significance and treatment. Should the find be deemed significant, as defined by CEQA (as amended, 2015), a Cultural Resources Monitoring and Treatment Plan shall be created by the	Project Applicant	City Planning Department	During grading or ground-disturbing activities		

Table 5-1: Mitigation Monitoring and Reporting Program

IDENTIFIED IMPACT	RELATED MITIGATION MEASURE ¹	CITY MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Initials	Date
	archaeologist, in coordination with San Manuel and Gabrieleno, and all subsequent finds shall be subject to this Plan. This Plan shall allow for monitors to be present that represent San Manuel and Gabrieleno for the remainder of the project, should San Manuel and/or Gabrieleno elect to place a monitor or monitors onsite.					
	TCR-2: Tribal Monitoring. The project proponent shall retain one or more Native American Monitor(s) from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation (Gabrieleno) and the Yuhaaviatam of San Manuel Nation (San Manuel). The monitor(s) shall be retained prior to the commencement of any “ground-disturbing activity” for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). “Ground-disturbing activity” shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching. A copy of the executed monitoring agreement(s) shall be submitted to the City as the lead agency prior to the commencement of any ground-disturbing activity or prior to the issuance of any permit necessary to commence a ground-disturbing activity.	Project Applicant	City Planning Department	Prior to issuance of any grading permit or ground-disturbing activities		

Table 5-1: Mitigation Monitoring and Reporting Program

IDENTIFIED IMPACT	RELATED MITIGATION MEASURE ¹	CITY MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Initials	Date
	The monitor(s) will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered tribal cultural resources (TCRs), including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project proponent and/or /lead agency upon written request to the Tribes. Onsite tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Gabrieleno and San Manuel from a designated point of contact for the project proponent and/or the City as the lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Gabrieleno and San Manuel to the project proponent and/or the City as the lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Gabrieleno and San Manuel TCRs.					

Table 5-1: Mitigation Monitoring and Reporting Program

IDENTIFIED IMPACT	RELATED MITIGATION MEASURE ¹	CITY MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Initials	Date
	Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.					
	TCR-3: Document Distribution. Any and all archaeological/cultural documents created as a part of the project (isolate records, site records, survey reports, testing reports, etc.) shall be supplied to the applicant and Lead Agency for dissemination to the Yuhaaviatam of San Manuel Nation Cultural Resources Department (San Manuel) and the Gabrieleno Band of Mission Indians – Kizh Nation (Gabrieleno). The Lead Agency and/or applicant shall, in good faith, consult with San Manuel and Gabrieleno throughout the life of project construction.	Project Archaeologist/ Applicant	City Planning Department	During all construction activities as necessary		
	TCR-4: Tribal Human Remains. Native American human remains are defined in PRC 5097.98(d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute. If Native American human remains and/or grave goods are discovered or recognized on the project	Project Archaeologist/ Applicant	City Planning Department	During all construction activities as necessary		

Table 5-1: Mitigation Monitoring and Reporting Program

IDENTIFIED IMPACT	RELATED MITIGATION MEASURE ¹	CITY MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Initials	Date
	site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2). Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.					

¹ Any changes to the measures identified in the Draft EIR that were changed as outlined in Section 3, Errata, of the Final EIR are shown as underlined text (for additions) or strike-through text (for deletions)



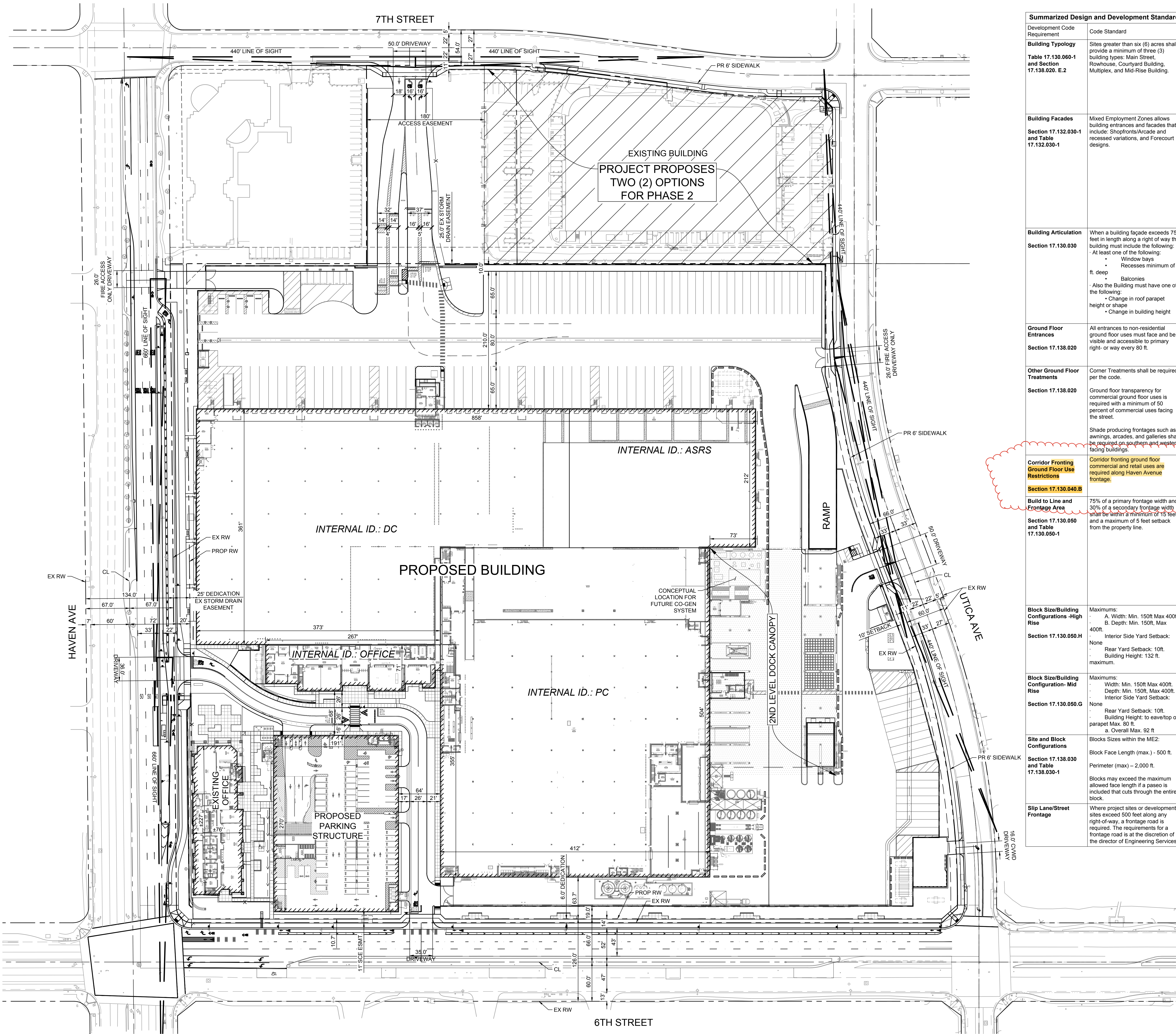
memo riverside

to **Sean Mcpherson, City of Rancho Cucamonga**
from **Kent Norton, MIG Riverside**
re **El Camino Final EIR – Final Corrections Memorandum**
date **September 23, 2025**

Subsequent to issuance of the Final EIR for the El Camino Project on September 16, 2025, the following items needed final correction as part of the Administrative Record for the EIR. The minor changes set forth below are hereby incorporated into the Final EIR:

Frontage lane: City staff notes that, as indicated throughout this environmental assessment, the developer has proposed a frontage lane along the Haven Avenue frontage, as seen in the corresponding plan set and various graphics throughout. Please note that upon further review, City staff has determined that a frontage lane is not necessary at this location, and the developer has now informed the City that they will remove this feature. Thus, all associated analyses contained in this environmental assessment which references the frontage lane is considered to be conservative as impacts related to the frontage lane will no longer occur. A condition of approval will be added to the project entitlements requiring that plans be revised to be consistent with City standard street sections and that these revised plans be submitted for review and approval prior to permit issuance.

Uniform Sign Program: City staff notes that the applicant has informed staff that they have removed the Uniform Sign Program application from the entitlement package as it is no longer necessary due to the scope of signage anticipated for the project. Staff notes that plans reflecting future signage for the development will be required to be submitted to the City for review and approval prior to permit issuance as part of the typical plan check process and that such signage will be required to conform to all city standards, including those signage standards as amended by the applicant's master plan application, where applicable. See the attached revised Master Plan dated 8-18-25 documenting this change.



Summarized Design and Development Standards of the ME-2 Zoning Designating		
Development Code Requirement	Code Standard	Project Request
Building Typology Table 17.130.060-1 and Section 17.138.020, E.2	Sites greater than six (6) acres shall provide a minimum of three (3) building types: Main Street, Rowhouse, Courtyard Building, Multiplex, and Mid-Rise Building.	The Master Plan will allow: two (2) building types including Mid-Rise and High-Rise Buildings. Building Typologies have been selected based on minimum development standards (i.e. setbacks, permitted heights, etc.) and not based on architectural design requirement. The building design is specific for an end user with specific manufacturing requirements and use needs.
Building Facades Section 17.132.030-1 and Table 17.132.030-1	Mixed Employment Zones allows building entrances and facades that include: Shopfronts/Arcade and recessed variations, and Forecourt designs.	The Master Plan will allow: architectural enhancements that reflect these architectural building facades/characteristics/design elements while maintaining the function for the operational needs of the facility. The office building along Haven Avenue, office areas on the primary manufacturing building have been enhanced with architectural elements consistent with the requirements of Section 17.132 and other enhancements including art applications, landscaping and screening details have been included to provide visual interest along Haven Avenue and 6th Street.
Building Articulation Section 17.130.030	When a building facade exceeds 75 feet in length along a right of way the building must include the following: - At least one of the following: - Window bays - Recesses minimum of 3 ft. deep - Balconies - Also the Building must have one of the following: - Change in roof parapet height or shape - Change in building height	The Master Plan will allow for the following: No change in roof parapet, change in height or the addition of window bays, recesses or balconies. In lieu of these details, the Project shall provide articulated concrete walls with metal panels, glass, decorative screen walls, etc.
Ground Floor Entrances Section 17.138.020	All entrances to non-residential ground floor uses must face and be visible and accessible to primary right-of-way every 80 ft.	The Master Plan shall allow the following: No entrances shall be required along Haven Avenue, 6th Street or Utica Avenue to serve the Project.
Other Ground Floor Treatments Section 17.138.020	Corner Treatments shall be required per the code. Ground floor transparency for commercial ground floor uses is required with a minimum of 50 percent of commercial uses facing the street. Shade producing frontages such as awnings, arcades, and galleries shall be required on southern and western facing buildings.	The Master Plan shall allow the following: Corner Treatments, balconies, ground floor transparency for commercial ground floor uses or shade producing frontages such as awnings, arcades, and galleries shall not be required for the Project.
Corridor Fronting Ground Floor Use Restrictions Section 17.130.040.B	Corridor fronting ground floor commercial and retail uses are required along Haven Avenue frontage.	The Master Plan shall allow the following: No commercial or retail uses shall be required at the ground floor fronting Haven Avenue corridor.
Build to Line and Frontage Area Section 17.130.050 and Table 17.130.050-1	75% of a primary frontage width and 30% of a secondary frontage width shall be within a minimum of 15 feet and a maximum of 5 feet setback from the property line.	The Master Plan will allow the following setbacks: Along Primary Frontage (Haven Avenue): Minimum 25'-5" and maximum 50'4" from property line. Along Secondary Frontage (6th Street and Utica Avenue): Minimum 15'-10" and maximum 78'-5" from property line. Buildings do not front on Utica Ave as parking and truck/dock doors are located along Utica Avenue. Therefore, measurements represent the frontage along 6th Street.
Block Size/Building Configurations -High Rise Section 17.130.050.H	Maximums: - A. Width: Min. 150ft Max 400ft. - B. Depth: Min. 150ft. Max 400ft. - Interior Side Yard Setback: None - Rear Yard Setback: 10ft. - Building Height: 132 ft. maximum.	Proposed: - Width: Min. No Maximum. - Depth: No Maximum. - Interior Side Yard Setback: None - Rear Yard Setback: 5ft. - Building Height: 131ft. maximum
Block Size/Building Configuration- Mid Rise Section 17.130.050.G	Maximums: - Width: Min. 150ft Max 400ft. - Depth: Min. 150ft. Max 400ft. - Interior Side Yard Setback: None - Rear Yard Setback: 10ft. - Building Height: to eave/top of parapet Max. 60 ft. - a. Overall Max. 92 ft.	Proposed: - Width: Min. No Max - Depth: No Maximum - Interior Side Yard Setback: None - Rear Yard Setback: 5ft. - Building Height: 131ft.
Site and Block Configurations Section 17.138.030 and Table 17.138.030-1	Blocks Sizes within the ME2: Block Face Length (max.) - 500 ft. Perimeter (max) - 2,000 ft. Blocks may exceed the maximum allowed face length if a paseo is included that cuts through the entire block.	The Master Plan will allow: Block Face Length (max.) - No maximum Perimeter (max.) - No maximum Paseos, employee break areas and other parklets/green spaces are not required to extend the entire block length.
Slip Lane/Street Frontage	Where project sites or development sites exceed 500 feet along any right-of-way, a frontage road is required. The requirements for a frontage road is at the discretion of the director of Engineering Services.	The Master Plan will allow the following: No slip lane or frontage road will be required when the Project site exceeds 500 feet along any right of way.

Parking Standards – Manufacturing, Light-Large Section 17.64.050-1	Parking is required for warehouse, office and manufacturing per table 17.64.050-1 in the Development Code. Therefore, the Project would be required to provide approximately 806 auto parking stalls. Additionally, the Project would be subject to the TDM program and would be required to provide bike parking and locker facilities.	The Master Plan will allow: a maximum number of 490 auto parking spaces. The Project would be subject to the TDM program and would be required to provide bike parking and locker facilities.
Bicycle Parking	25 short term bicycle parking spaces and 25 long term bicycle parking spaces would be required for the project based on the 5% of the required parking	The Master Plan will allow the following: 44 Bicycle parking spaces will be provided within the parking structure. No lockers would be provided.
Signage	Per the RCMU: - Wall Mounted: - One Per Building Face - Maximum of 2 per street face Sign Area: 400 sf - Maximum Sign Copy Dimensions: - Architectural Art Sign Installation: If 1 line of copy: A maximum of 10' high X 92' long per line with a maximum area of 1,650 sf per building facade. Standard Sign Installation: - If a single line of copy: 10' high 40' long per building facade. - If two lines of copy: 5' high X 40' long per line per building facade. Free Standing/Monument: - 1 sign per street frontage Maximum Area: 24 sf Maximum Height: up to 8' in height Maximum number: 1 per street frontage and may be increased to two per street frontage when signs are spaced a minimum of 300 feet apart or alternatively, the maximum area may be increased to 48 sf when the sit frontage is longer than 500 feet. These can not be combined. Commercial/mixed use/Industrial facilities are exempt from Table 17.74.080-1	Wall Mounted: - One Per Building Face - Maximum of 2 per street face Sign Area: 400 sf - Maximum Sign Copy Dimensions: - Architectural Art Sign Installation: If 1 line of copy: A maximum of 10' high X 92' long per line with a maximum area of 1,650 sf per building facade. Standard Sign Installation: - If a single line of copy: 10' high 40' long per building facade. - If two lines of copy: 5' high X 40' long per line per building facade. Free Standing/Monument: - Up to 8' in height Sign Area: 36 square feet per sign face Maximum number: 2 per street frontage with 300 feet apart Exterior Wayfinding: Including vehicular directional and pedestrian wayfinding signage. Freestanding Wayfinding Sign Height: Maximum of 14 feet Maximum sign area: 150 sq. ft. of sign area (not including sign structure, pole, or architectural elements) (1).

(1) Architectural element's shall be defined as oversized graphics, contour or silhouette sections of the sign that may protrude from the sign face or cabinet, glass/metal finishes or fixtures that enhances the sign or adds dimension.

Summarized Landscape Standards, Development Code Requirements		
Development Code Requirement	Code Standard	Project Request
Open Space/Courtyards Section 17.134.030	Projects over 3 acres shall provide two (2) open spaces. This includes: Pocket parks (no min.), Paseos, or Town Square.	The Project will provide open spaces for employees and a public/private linear park space along Haven Avenue and 6th Street.
Walls/Fencing Section 17.48.050.E	Screening and walls shall be no higher than 8 ft in height within the industrial zone including screening of loading docks and reuse areas.	The Master Plan shall allow perimeter wall, screening walls and decorative walls between 6 ft. to 14 ft. in height along the perimeter of the project site, primarily along the truck courts to screen mechanical equipment, truck areas, and elevated truck parking.
Landscaping/Tree Ordinance- Removal and Replacement Section 17.56.050, 17.56.080, and 17.80	Parking Lot Landscaping shall be required with a minimum of one tree per 3 parking stalls. 10% of the total off-street parking area with landscaping, a minimum of 5' of perimeter of landscaping along side and rear proper lines and surface lots shall be screened. Existing trees shall be evaluated by an arborist. Removal of heritage trees shall be considered at a ratio of 1:1/2.	For the Master Plan: A total of 24 trees were determined heritage trees by a certified arborist. A total of 110 will be replaced on site. This replacement exceeds the 3 to 1 replacement requirement. The trees will be located within employee break areas, along parkways, within green spaces, and enlarged setbacks and will not be required to meet the 1 tree per 3 parking stalls requirement as all parking spaces are within a parking garage. Landscaping shall be per the site plan as shown.



memo riverside

to Sean Mcpherson, City of Rancho Cucamonga

from Kent Norton, MIG Riverside

re Final EIR Addendum Memorandum – Caltrans Letter

date 10/24/2025

The draft Final EIR for the El Camino Project was made available on September 16, 2025. On October 24, the City was made aware of an email from Janki Patel with Caltrans District 8 indicating that a comment letter on the DEIR was sent on June 13, 2025. This letter was inadvertently omitted from the Responses to Comments in the draft Final EIR document so it is being addressed in this FEIR Addendum Memorandum.

Most of the comments contained in the Caltrans letter specifically address the Traffic Impact Assessment (TIA) and congestion of the I-10 and I-15 freeways. It should be noted that congestion is no longer considered the threshold of significance for CEQA documents¹. These comments are included in full with this memorandum, along with a copy of the June 13, 2025 letter from Cal Trans (see attached).

Summary. Although the Caltrans letter dated June 13, 2025 was inadvertently omitted from the draft Final EIR, most of its comments deal with traffic congestion-related issues which are no longer considered significance criteria under CEQA. The minor comments related to the Draft EIR are the result of typographical errors, which have been corrected as part of the draft Final EIR document. In addition, as a condition of the approval, the El Camino Project TIA will be revised subsequent to action on the Project (if approved) to address Caltrans' congestion-related concerns (i.e., adding a queueing study and safety review of the I-10/Haven Ave and I-15/4th Street interchanges). Any improvements would meet ADA requirements, and an encroachment permit would be obtained from Caltrans if needed.

¹ California Senate Bill 743 (SB 743) directed the State Office of Planning and Research (OPR) to amend the CEQA Guidelines for evaluating transportation impacts to provide alternatives to Level of Service that "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." In December 2018, the California Natural Resources Agency certified and adopted the updated CEQA Guidelines package. The amended CEQA Guidelines, specifically Section 15064.3, recommend the use of vehicle miles traveled (VMT) as the primary metric for the evaluation of transportation impacts associated with land use and transportation projects. In the past, traffic studies focused on level of service (LOS) which is a measure of roadway and intersection congestion. In general terms, VMT quantifies the amount and distance of automobile travel attributable to a project or region. All agencies and projects State-wide are required to utilize the updated CEQA guidelines recommending use of VMT for evaluating transportation impacts as of July 1, 2020.

California Department of Transportation

DISTRICT 8
464 WEST 4TH STREET
SAN BERNARDINO CA, 92401
(909) 963-8604
www.dot.ca.gov



June 13, 2025

Route & Postmile #: I-10/8.31
Cross Street: NEC Haven Avenue & 6th Street
GTS ID: 36262
SCH #: 2023080369

City of Rancho Cucamonga
Department of Planning
Attn: Sean McPherson
1500 Civic Center Drive
Rancho Cucamonga, CA, 91730

Subject: El Camino Project, APNs: 209-411-02, -03, -04, -23, -24, -32, -34, and-35

The California Department of Transportation (Caltrans) Local Development Review (LDR) branch has completed its review of the Draft Environmental Impact Report (EIR) and related documents for the proposed El Camino Project, located in the southern area of the City of Rancho Cucamonga in southwestern part of the County of San Bernardino, California.

The proposed project involves the expansion of Lone Oak—Rancho LLC's beverage distribution facility across a 30.1-acre site. The project consists of demolishing up to 237,895 square feet of existing building and developing up to 1,054, 541 square feet of new industrial, manufacturing, and office space, including a 4- story, 335,475-square-foot parking structure. Construction will occur in two phases and includes two development options: phase 2A, which retains an existing 62,210-square-foot warehouse, or phase 2B, which replaces it with a new 40,085-square-foot building. The project includes infrastructure and site improvements as well as new vehicle access. It is anticipated to generate vehicle trips that affects nearby state highways, triggering the need for transportation demand management strategies.

Based on the information provided in the environmental documents made available for public review, we are submitting the following comments and recommendations for consideration.

General:

1. Please include responses to Review Comments memorandum for your next review submittals.

Traffic Impact Study:

2. Please perform a queueing analysis for the I-10/Haven Ave interchange and I-15/4th St interchange and any additional locations that will generate additional trips on the state

CT-1

CT-2

- Highway System.
3. *EIR Appendices, Appendix K-3 TIS LOS document, HCM 6th Signalized Intersection Summary 8* “Existing Conditions”—please change the year of the “Existing Conditions” to reflect when the traffic counts were collected (2024).
 4. *Draft EIR document, (p. 4.17-16)* mentions “the project has good local and regional access for truck to the I-10 and I-215 freeways”—The project is not close to the I-1215.
 5. *Draft EIR document, (p. 4.17-16)* states “the project has direct access to I-10 and I-215”—The project does not have direct access to the I-215.

CT-3

CT-4

CT-5

Safety Review:

6. The proposed project will generate additional trips on the State Highway System, provide a Safety Analysis Report for the I-10/Haven Ave interchange and I-15/4th St interchange.
7. The Safety Analysis Report shall follow the attached guidance. See attached Local Development Review (LDR) Safety Review Practitioner Guidance in February 2024. Please flow the steps below:
 - a. To request crash data on the State Highway System, please submit your request via our California Public Records Act (CPRA) portal following the link (Support Home Page (mycusthelp.com)).
 - b. Please analyze the existing crash data and discuss the project's impact on safety as needed.
 - c. Perform safety analysis using HSM (Supplement 2014) Chapter 19 for the proposed project in the following conditions:
 - i. Existing condition.
 - ii. Opening year: with and without project.
 - iii. Horizon year: with and without project.
 - d. Please provide appropriate countermeasures to mitigate/ reduce project's safety impact if applicable.

CT-6

Equitable Access

If any Caltrans facilities are impacted by the project, they must comply with the American Disabilities Act (ADA) Standards upon project completion. Additionally, the project must ensure the maintenance of bicycle and pedestrian access throughout the construction phase. These access considerations align with Caltrans' equity mission to provide a safe, sustainable, and equitable transportation network for all users.

CT-7

Caltrans Encroachment Permit

Please be advised that any permanent work or temporary traffic control that encroaches onto Caltrans' Right-of-Way (R/W) requires a Caltrans-issued encroachment permit.

For information regarding the Encroachment Permit application and submittal requirements, contact:

Caltrans Office of Encroachment Permits
 464 West 4th Street, Basement, MS 619
 San Bernardino, CA 92401-1400
 (909) 383-4526

D8.E-permits@dot.ca.gov

<https://dot.ca.gov/programs/traffic-operations/ep>

Important Note: All permit applications must now be submitted through our CEPS Online Portal at: <https://ceps.dot.ca.gov/>

Currently, no further review from the Local Development Review (LDR) Branch is required. Please be advised that LDR's point of contact role will conclude upon the completion of the development entitlement process. Once the project is entitled, the Encroachment Permit Office will serve as the primary point of contact moving forward.

Thank you again for including Caltrans in the review process. Should you have any questions regarding this letter, or for future notifications and requests for review of new projects, please email LDR-D8@dot.ca.gov or call 909-963-8604.

Sincerely,

A handwritten signature in black ink that reads "Janki Patel". The signature is written in a cursive, flowing style.

Janki Patel

Branch Chief - Local Development Review
Division of Transportation Planning
Caltrans District 8

Response to Comments – Draft FEIR (Addendum)

Response to Cal Trans Letter dated June 13, 2025

ID	Response to Comment Letter CT – Cal Trans
CT-1	This section of the comment letter provides introductory information and project information. This portion of the letter also requests responses which are contained herein.
CT-2	In response to the Caltrans Letter Comment #2, the TIA prepared for the El Camino Project <u>did</u> examine potential congestion at the I-10 and I-15 at the intersections indicated in the letter. The request to perform a queueing study for these intersections is a congestion-related issue that the City will address separately as part of an update to the El Camino Project TIA subsequent to action on the Project (if approved) and has been included as a condition of approval for the Project. While traffic congestion is not a CEQA-related issue, the City does plan to address Caltrans's concerns as part of the overall Project review.
CT-3	In response to Cal Trans Letter Comment #3, The City does not consider this a substantive or necessary change to the EIR documentation so this change will <u>not</u> be reflected in the Draft EIR text.
CT-4	The comment was actually referring to the I-15 not the I-215. This error is considered corrected by way of this response to comment.
CT-5	Similar response to #4 above. The comment was actually referring to the I-15 not the I-215. This error is considered corrected by way of this response to comment.
CT-6	Caltrans Letter Comments #6 and #7 recommend a safety review of the I-10/Haven Ave and I-15/4 th Street interchanges. Such analysis is related to congestion conditions, which are no longer considered a significance criteria under CEQA. This will be addressed separately as part of an update to the El Camino Project TIA subsequent to action on the Project (if approved) and has been included as a condition of approval for the Project.
CT-7	If any improvements are needed within Caltrans ROW, they will meet applicable ADA requirements and the City will obtain an Encroachment Permit, if necessary, using the contact information provided in this section of the letter.
CT-8	The City acknowledges this comment.