FINAL ENVIRONMENTAL IMPACT REPORT

Arrow Commerce Center Project

SCH No. 2023110033

Prepared for:

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

April 2026

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10500 Civic Center Drive
Rancho Cucamonga, CA 91730

Contact:

Christine Delostrinos
Senior Planner
909.477.2750
Christine.Delostrinos@CityofRC.us

Prepared by:

Ascent
530 Technology Drive, Suite 100
Irvine, CA 92618

Contact:

Marlie Long
Project Manager
619.604.3787
marlie.long@ascent.inc

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LIST OF ABBREVIATIONS

AADT	Annual Average Daily Traffic
ADA	American Disabilities Act
AIA	airport influence area
ATCM	Airborne Toxic Control Measure
ALUC	Airport Land Use Commission
APN	Assessor Parcel Numbers
CA DOJ	California Department of Justice
CalEEMod	California Emissions Estimator Model
CARB	California Air Resources Board
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CCR	California Code of Regulations
CEQA	California Environmental Quality Act
City	City of Rancho Cucamonga
CPUC/Commission	California Public Utilities Commission
COC	containment of concern
CPTED	Crime Prevention Though Environmental Design
CPRA	California Public Records Act
CUP	conditional use permit
CUPA	Certified Unified Program Agency
DIF	development impact fee
DPM	diesel particulate matter
DRO	diesel range organics
DTSC	California Department of Toxic Substances
EIR	Environmental Impact Report
EPA	US Environmental Protection Agency
FAA	Federal Aviation Administration
FONT	Fontana station
Final EIR	Final Environmental Impact Report
PlanRC	General Plan
GHG	greenhouse gas
HCA	Housing Crisis Act
HRA	health risk assessment
IE	Industrial Employment

LOS	Level of Service
LST	localized significance thresholds
LUC	land use covenant
LW	Large Warehouse Overlay Zone
MMRP	Mitigation Monitoring and Reporting Program
msl	mean sea level
MUTCD	California Manual on Uniform Traffic Control Devices
NI	Neo Industrial
NOP	Notice of Preparation
NPDES	National Pollution Discharge Elimination System
NZE	near zero emissions
OEHHA	Office of Environmental Health Hazard Assessment
OM&M	Operations, Maintenance, and Monitoring
PCB	polychlorinated biphenyls
PM	particulate matter
proposed project	Arrow Commerce Center Project
RAP	Remedial Action Plan
RCEB	Commission's Rail Crossings Engineering Branch
RCMC	Rancho Cucamonga Municipal Code
ROG	reactive organic gases
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
SBTAM+	San Bernardino Transportation Analysis Model
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SoCalGas	Southern California Gas Company
SCRRA	Southern California Regional Rail Authority
TAZ	transit analysis zone
TOD	Transit Oriented Development
TRU	transport refrigeration units
VMIS	vapor intrusion mitigation system
VMT	vehicle miles traveled
VOC	volatile organic compounds
WAIRE	Warehouse Actions and Investments to Reduce Emissions
ZE	zero emissions

1 INTRODUCTION

This Final Environmental Impact Report (EIR) has been prepared by the City of Rancho Cucamonga (City), as lead agency, in accordance with the requirements of the California Environmental Quality Act (CEQA) and the State CEQA Guidelines (California Code of Regulations [CCR] Section 15132) for the Arrow Commerce Center Project (proposed project) (City of Rancho Cucamonga 2025; State Clearinghouse No. 2023110033). The Final EIR consists of the Draft EIR and this document, which includes comments received on the Draft EIR, responses to those comments, and revisions to the Draft EIR.

1.1 PURPOSE AND INTENDED USES OF THIS FINAL EIR

CEQA requires a lead agency that has prepared a Draft EIR to consult with and obtain comments from responsible and trustee agencies that have jurisdiction by law with respect to the proposed project, and to provide the public with an opportunity to comment on the Draft EIR. The Final EIR is the mechanism for responding to these comments. This Final EIR has been prepared to respond to comments received on the Draft EIR, which are reproduced in this document; and to present corrections, revisions, and other clarifications and amplifications to the Draft EIR, including project updates, made in response to these comments and as a result of the applicant's ongoing planning and design efforts. The Final EIR will be used to support the City's decision regarding whether to approve the proposed project.

This Final EIR may also be used by CEQA responsible and trustee agencies to ensure that they have met their requirements under CEQA before deciding whether to approve or permit project elements over which they have jurisdiction. It may also be used by other state, regional, and local agencies that may have an interest in resources that could be affected by the proposed project or that have jurisdiction over portions of the proposed project.

1.2 PROJECT LOCATION

The approximately 94-acre project site is located at 12451 Arrow Route Road in the city of Rancho Cucamonga (city) and encompasses four Assessor Parcel Numbers (APNs): 0229-121-33; 0229-121-34; 0229-121-35; and 0229-131-19. The project site is generally L-shaped and is relatively flat with approximate surface elevations of 1,160 feet above mean sea level (msl) at the northwest corner and 1,125 feet msl at the southwest corner, resulting in approximately 35 feet of relief across the project site. The project site is bounded by Arrow Route to the north, industrial land uses to the east, the Atchison Topeka and Santa Fe Railway (AT/SF Railway) to the south, and industrial manufacturing and undeveloped land uses to the west. Figures 1-1 and 1-2 show the project's regional setting and project location, respectively.



Source: Adapted by Ascent in 2023.

Figure 1-1 Regional Setting



Source: Adapted by Ascent in 2023.

Figure 1-2 Project Location

1.3 PROJECT OBJECTIVES

The project applicant has developed the following objectives for the proposed project:

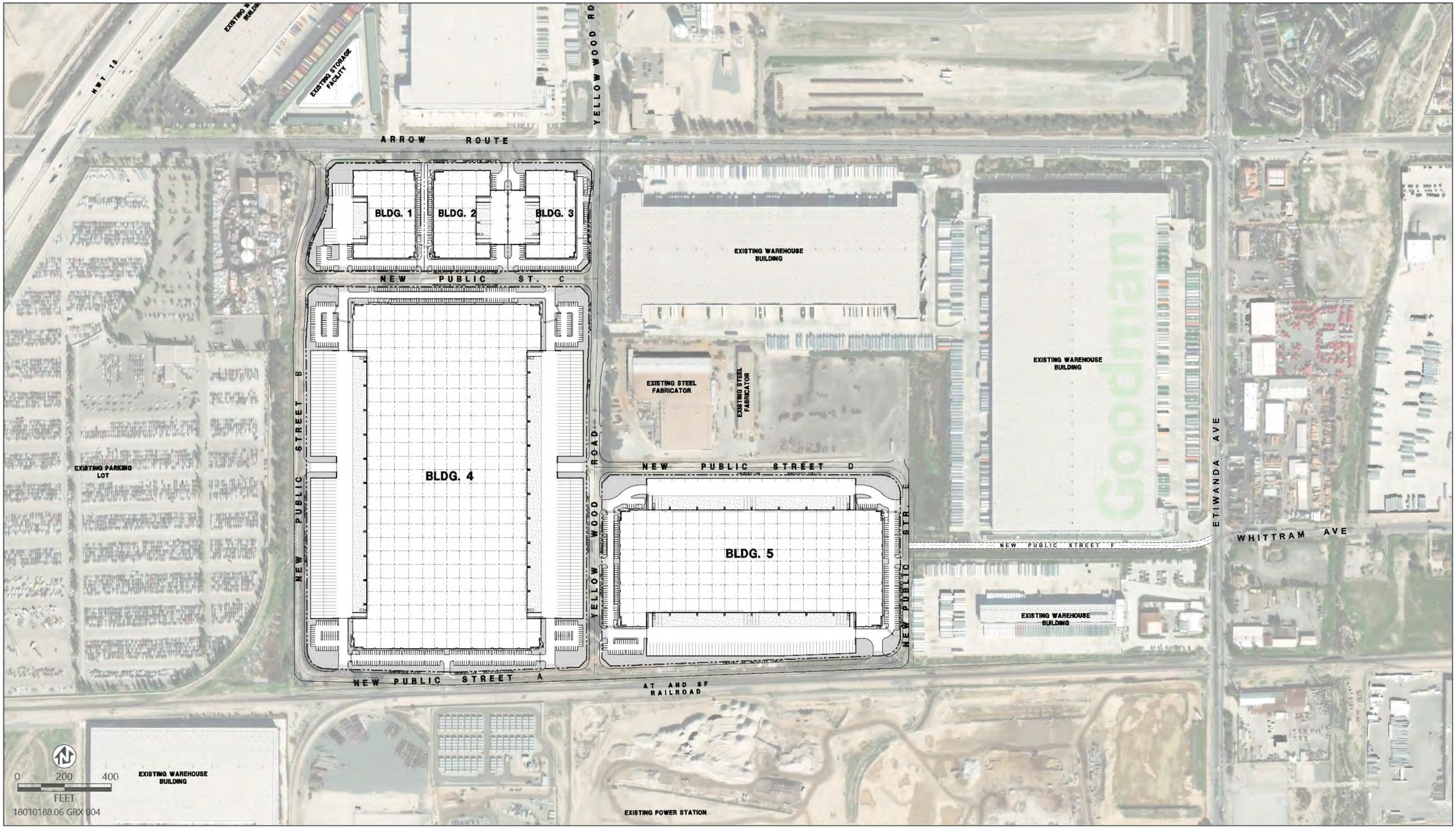
- Develop a vacant, underutilized site that implements the General Plan's vision for a modernized industrial employment district in the Southeast Industrial Area.
- Remove hazardous materials from the project site to enable industrial development compatible with human health standards.
- Locate warehouse development near compatible land uses and businesses and avoid conflicts with residential and other sensitive land uses.
- Develop in proximity to available infrastructure, such as designated truck routes, the State highway system, and utilities, with connections to the Southern California supply chain and goods movement network.
- Provide a complete network of streets and access routes to increase access and improve public safety in the Southeast Industrial Area.
- Increase the number and quality of employment opportunities in the City to reduce the need for members of the local workforce to commute outside the area for employment and improve the jobs-to-housing balance.
- Maximize the rate of economic activity per acre of land to increase the City's tax base and increase overall economic development in the City.

1.4 SUMMARY DESCRIPTION OF THE PROJECT

The proposed project includes the demolition and site clearing of existing paved surface areas and site grading, excavation, and the development of five 2-story industrial buildings. The five industrial buildings consist of approximately 1,830,729 gross square feet of new building floor area for warehouse distribution and associated office space. The project also includes loading docks for truck trailers, 968 vehicle parking spaces, 444 truck trailer parking spaces, six new public streets, water quality basins, utility infrastructure, and exterior lighting and signage. The proposed project would develop the project site with 44 acres of paved or other impervious surface area and provide approximately 10 percent landscape coverage. Figure 1-3 shows the proposed site plan.

The proposed buildings would be constructed of concrete tilt-up panels with reveal lines (trim for concrete panels that creates an aesthetic reveal between two panels), with multiple gray paint tones, vision glass, and spandrel glass to provide a modern aesthetic. Offices will be located at one or more corners of the buildings that will feature more extensive glass work, tiles, metal canopies, and aluminum storefront framing with tempered glazing at all doors. Buildings will range in height from 39 feet, 6 inches for Buildings 1-3; 49 feet, 6 inches for Building 4; and 47 feet for Building 5. Landscaping would be provided by the project applicant prior to completion of construction in accordance with the RCMC Chapter 17.56, Landscaping Standards.

While the proposed project would remove 168 existing trees from the project site, approximately 895 trees would be planted with development of the proposed project, including twenty-five 48-inch box, fifty-one 36-inch box, and eight hundred nineteen 24-inch box trees. Trees planted by the proposed project would achieve at least 35 percent shade coverage within off-street automobile parking areas.



Source: Provided by HPA Architecture, February 6, 2023; adapted by Ascent, 2024.

Figure 1-3 Proposed Site Plan

Construction of the proposed project would occur over approximately 18 months. For purposes of the analysis in the Draft EIR, construction was assumed to begin in January 2026 and end in July 2027. Construction activities associated with the proposed project would occur in the following stages: demolition and site clearing, grading and excavation, building construction and infrastructure improvements, architectural coatings, and paving. Proposed project operations are anticipated to commence in 2027. The proposed warehouse distribution buildings are planned as speculative buildings with future tenants or buyers of the buildings not known. Of the five proposed buildings included in the proposed project, Buildings 1, 2, and 3 are anticipated to operate Monday through Friday between 4:00 a.m. and 8:00 p.m. (16 hours per day, 80 hours per week), and Buildings 4 and 5 are anticipated to operate 24 hours per day, seven days per week. The proposed project is estimated to accommodate approximately 1,408 employees daily.[1]

The types of tenants that would occupy the proposed buildings and the resulting business activities that would be conducted are not known at this time. For the purpose of evaluating the proposed project's environmental effects in the Draft EIR, the proposed building floor area of the five buildings is assumed to be used as follows:

- 78 percent High-Cube Fulfillment Center (non-sorting);
- 12 percent General Warehouse; and
- 10 percent High-Cube Cold Storage Warehouse.

The project site has several areas of concern from historical uses, including volatile organic compounds (VOCs) in soil vapor and metals, diesel range organics (DRO), and polychlorinated biphenyls (PCBs) in shallow soils at concentrations that exceed industrial screening levels. Prior to site-wide grading and construction, these concerns will require remedial action. Based on the comprehensive suite of data generated for the site, all data gaps have been addressed and a Draft Remedial Action Plan (RAP) (Roux Associates 2025) has been prepared by the project applicant under the oversight of California Department of Toxic Substances Control (DTSC). The RAP identifies future removal actions and mitigative actions (engineering and institutional controls) for the purposes of industrial redevelopment. The following actions are proposed to protect human health and the environment by minimizing the potential risk of exposure to future on-site receptors, as well as minimizing or eliminating potential future groundwater degradation from leaching of contaminants of concern (COCs):

- Permanent removal of soils, asphalt, and concrete in areas of concern impacted by DRO, metals, benzo[a]pyrene, PCBs, will be excavated to appropriate screening levels.
- A passive vapor intrusion mitigation system (VIMS) will be designed in accordance with DTSC's Vapor Intrusion Mitigation Guidance and installed beneath the future Building 4 to mitigate potential accumulation and intrusion of VOCs.
- Future land use at the project site, including the prohibition of groundwater use for drinking water purposes, will be restricted through recording of a land use covenant (LUC) with the San Bernardino County Recorder's Office, pursuant to California Code of Regulations, Title 22, Section 67391.1.
- A Site-specific Operations, Maintenance, and Monitoring (OM&M) Plan will be prepared for the Site, which will define sampling and reporting procedures for soil vapor probes and indoor air. The OM&M Plan also will define contingency plans and provide decision-making protocols.

All remedial actions will be subject to approval and oversight by DTSC prior to site-wide grading.

The proposed project requires the City's approval of the following entitlements for the proposed project: design review application; conditional use permit (CUP) and Master Plan application pursuant to Section 17.30.030 (Allowed Land Uses and Permit Requirements) of the Rancho Cucamonga Municipal Code (RCMC); zoning map amendment pursuant to Section 17.38.080 (Large Warehouse Overlay Zone) of the RCMC; and a development agreement.

[1] Average employees per square foot is 1:1,300 sf of building space.

Other agencies that may also use the Final EIR to approve subsequent implementation actions and/or regulatory permitting activities for the proposed project include the Santa Ana Regional Water Quality Control Board (Region 8) for oversight on compliance with National Pollution Discharge Elimination System (NPDES) and San Bernardino County Municipal Separate Storm Sewer Systems (MS4s) Permit (Order No. R8-2010-0036, NDPES Permit No. CAS618036) requirements; San Bernardino County Environmental Health Division for oversight on compliance of hazardous materials use and storage in accordance with the Certified Unified Program Agency (CUPA) Program; and local utility providers for utility connection permits and approvals.

1.5 MAJOR CONCLUSIONS OF THE ENVIRONMENTAL ANALYSIS

The Draft EIR identified potentially significant impacts associated with air quality; archaeological, historical, and tribal cultural resources; energy; greenhouse gas (GHG) emissions; hazards and hazardous materials; geology and soils (paleontological resources); noise; and transportation. With the incorporation of mitigation measures, the Draft EIR concluded that potentially significant impacts identified for these resource areas would be mitigated to less than significant levels except for air quality and transportation. Even with implementation of all feasible mitigation measures, the Draft EIR determined impacts related to air quality and transportation would remain significant and unavoidable. Refer to Appendix B, "Mitigation Monitoring and Reporting Program (MMRP)," for a detailed description of the applicable mitigation measures for the proposed project.

1.6 CEQA PUBLIC REVIEW PROCESS

On October 1, 2025, the City released the Draft EIR for a 45-day public review and comment period. The Draft EIR was submitted to the State Clearinghouse for distribution to reviewing agencies and posted on the CEQAnet Web Portal. The Draft EIR was also posted on the City's website and was made available at the City Clerk's Office, the City Planning Department Public Counter, Archibald Library, and Paul A. Biane Library. The City published a Notice of Availability (NOA) of the Draft EIR in the Inland Valley Daily Bulletin and distributed the notice to a project-specific mailing list.

In response to these notification efforts, written comments were received from the California Department of Transportation (Caltrans), California Public Utilities Commission (CPUC), South Coast Air Quality Management District (SCAQMD), Southern California Gas Company (SoCalGas), and Blum, Collins & Ho, LLP. Chapter 3, "Responses to Comments," identifies these commenting parties, reproduces their respective comments, and provides responses to these comments. None of the comments received, or the responses provided, constitute "significant new information" by CEQA standards (State CEQA Guidelines CCR Section 15088.5). In other words, no new significant impacts or other conditions set forth in Section 15088.5(a) of the State CEQA Guidelines were identified. As such, the changes made to the Draft EIR in response to the comments received do not trigger a recirculation of the Draft EIR pursuant to Section 15088.5 of the State CEQA Guidelines

1.7 ORGANIZATION OF THE FINAL EIR

This Final EIR is organized as follows:

Chapter 1, "Introduction," describes the purpose of this Final EIR, summarizes the proposed project and the major conclusions of the Draft EIR, provides an overview of the CEQA public review process, and describes the content of this Final EIR.

Chapter 2, "Responses to Comments," contains a list of all parties that submitted comments on the Draft EIR during the public review period, the comments received, and responses to the comments.

Chapter 3, "Revisions to the Draft EIR," presents revisions to the Draft EIR text made in response to comments, or to amplify, clarify or make minor modifications or corrections. Changes in the text are signified by strikeouts (~~strikeouts~~) where text is removed and by underline (<u>underline</u>) where text is added.

Chapter 4, "References," identifies the documents used as sources for the analysis.

Chapter 5, "List of Preparers," identifies the lead agency contacts, as well as the preparers of this Final EIR.

2 RESPONSES TO COMMENTS

This chapter identifies the commenters and contains the comments received during the public review period for the Draft EIR, which concluded on November 17, 2025.

2.1 LIST OF COMMENTERS ON THE DRAFT EIR

Table 2-1 presents the list of commenters, including the numerical designation for each comment letter received, the author of the comment letter, and the date of the comment letter. The comment letters are presented in the order in which the letters were received. All comment letters are contained in Appendix A, "Comment Letters," of this Final EIR.

Table 2-1 List of Commenters

Letter No.	Commenter	Date
1	Southern California Gas Company (SoCal Gas)	October 2, 2025
2	California Public Utilities Commission (CPUC)	October 24, 2025
3	South Coast Air Quality Management District (SCAQMD)	November 13, 2025
4	Blum, Collins & Ho LLP	November 13, 2025
5	California Department of Transportation (Caltrans)	November 17, 2025

2.2 COMMENTS AND RESPONSES

The comment letters are provided in Appendix A. Where a comment letter contains multiple comments, each comment is indicated by a line bracket and an identifying number in the margin of the comment letter. The individual comments are reproduced in their entirety in this section, and each comment is followed by a response. Some of the written comments describe regulatory processes and requirements related to the project and do not address environmental issues or the adequacy of the EIR. All comment letters will be considered by the City of Rancho Cucamonga City Council as part of deliberations on whether to certify this Final EIR. In conformance with Section 15088(a) of the State CEQA Guidelines, written responses were prepared addressing comments on environmental issues raised in comments on the Draft EIR.

Letter 1 Southern California Gas Company

Will Liao, Region Planning Supervisor
October 2, 2025

Comment 1-1
Hi Sean.

I just reviewed your letter regarding the Arrow Commerce Center Project at Arrow and Juneberry.

SoCalGas appears to have some existing medium- and high-pressure facilities in easements within the project area, as well as high-pressure and transmission facilities within the Arrow Route right of way.

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

Response 1-1
The comment describes notification and coordination requirements for project activities with potential to result in utility conflicts. The project applicant will be required to submit relevant information and coordinate with existing utility service providers to identify any potential utility line conflicts during the City's design and review process. Prior to project-related excavation and demolition activities, the project applicant will comply with all notification requirements related to the identification of underground utilities in accordance with State law. This comment is not related to the adequacy of the CEQA document; therefore, no revisions to the Draft EIR are necessary in response to this comment.

Comment 1-2
If the developer needs gas, please have them reach out to our Builder Services group as soon as practicable to begin the application process, at Builder Services | SoCalGas.

Please let me know if you have any questions.

Response 1-2
The comment provides direction regarding requesting new gas services. As described in Chapter 2, "Project Description," on page 2-32 of the Draft EIR, the proposed project would not include any natural gas hook-ups or piping. This comment is not related to the adequacy of the CEQA document; therefore, no revisions to the Draft EIR are necessary in response to this comment.

Letter 2 California Public Utilities Commission

Anh Truong, PE, Senor Utilities Engineer (Supervisor)
October 24, 2025

Comment 2-1

The California Public Utilities Commission (Commission/CPUC) has jurisdiction over rail crossings (crossings) in California. The CPUC ensures that crossings are safely designed, constructed, and maintained. The Commission's Rail Crossings Engineering Branch (RCEB) is in receipt of the Final Document (FIN) for the proposed Newcastle Arrow Route Project. The City of Rancho Cucamonga (City) is the lead agency.

The project site is located at 12451 Arrow Route in the city of Rancho Cucamonga, bounded by Arrow Route Road to the north, industrial land uses to the east, the Southern California Regional Rail Authority (SCRRA) San Gabriel subdivision to the south, and industrial manufacturing and undeveloped land uses to the west). The site can be accessed from two routes, one of which crosses an at-grade highway-rail crossings along the SCRRA San Gabriel subdivision; Etiwanda Avenue (DOT# 026151P, CPUC# 101SG-44.14).

Response 2-1

The comment provides an introduction to CPUC's oversight of rail crossings as well as provides an overview of the proposed project, including its location near an at-grade highway-rail crossing under the commenter's jurisdiction. This comment is not related to the adequacy of the CEQA document; therefore, no revisions to the Draft EIR are necessary in response to this comment.

Comment 2-2

The Etiwanda Avenue at-grade highway-rail crossing (Crossing) consists of a 2-lane asphalt roadway with active railroad warning devices and is currently planned to be grade separated. The City has plans to grade separate the Crossing, which was authorized by RCEB under XREQ 20221200001 on December 20, 2022. Per the request submitted by the City, the Project was intended to reduce congestion and mitigate future growth impacts to alleviate delays and queuing that currently exist at the Crossing and along Etiwanda Avenue.

As the grade separation Project has not yet commenced due to lack of construction funding, RCEB recommends that the City review the area and provide any mitigations measures for the increase in vehicular activity (particularly trucks) from this and other new adjacent developments. Mitigations measures to consider can be, but not be limited to, requiring trucks to utilize Foothill Blvd to access the freeway and avoid the Crossing or improving the Crossing in the interim condition by adding an additional lane to reduce the single lane bottleneck at the Crossing for both the northbound and southbound directions. These mitigation measures can be accomplished through a capital project funded by the City or as a condition of approval for the development. Additionally, the City should consider that the development help partially fund the grade separation since their development will significantly increase the volume of vehicles, particular large semi-trucks, over the Crossing.

Response 2-2

The comment is requesting that mitigation or funding requirements be considered for the proposed project to help fund the construction of the grade separation at Etiwanda Avenue and SCRRA railroad crossing since the project would increase vehicle activity, particularly trucks, in the project area. As discussed in Appendix J, "Non-CEQA Level of Service Report," of the Draft EIR, the transportation analysis did not assume the construction of the grade separation at Etiwanda Avenue project in the Future Year (2050) scenarios at the request of the City due to the lack of funding. For this reason, the transportation analysis considered the existing and with project conditions in opening year without the construction of the grade separation and identified the improvements needed to address that condition, as applicable. Based on the analysis, no improvements to the railroad crossing were identified as being required related to implementation of the project and therefore, no mitigation measures were required for the construction of the grade separation. However, the project applicant will contribute its fair share contribution to the roadway improvements, including construction of the grade separation project, as required by the City's transportation development impact fee (DIF) program. The "Roadway Improvements" discussion included on page 3.13-18 of Section

3.13, "Transportation," of the Draft EIR has been revised as shown in Chapter 3, "Revisions to the Draft EIR," of this Final EIR to clarify the project applicant's participation in the City's transportation DIF program.

Comment 2-3

It is also recommended that consideration be taken to seal off access to the railroad corridor south of the newly proposed roadway designated as "New Public Street A," to deter any trespassing that leads to the active SCRRA San Gabriel subdivision mainline tracks. Parking should not be allowed on the south side adjacent to the railroad corridor unless a physical curb is installed to define the limits of the roadway and fencing is installed along the roadway to prevent vehicle from parking too close to the tracks and within SCRRA's right-of-way. Guardrail should be evaluated and considered on "New Public Street A" where "New Public Street B," Yellow Wood Rd, and "New Public Street F" intersects to prevent any errant vehicles from ending up on the SCRRA tracks. Adequate lighting should also be provided at those locations to provide visibility of the roadway during the evening or times of low visibility.

Response 2-3

The comment recommends installation of guardrails to separate the New Public Street A and the SCRRA railroad tracks to prevent vehicles from parking near the railroad tracks and within the SCRRA's right-of-way. The comment also recommends that adequate lighting be provided along New Public Street A to prevent errant vehicles from entering the SCRRA's railroad tracks. The proposed project includes the development of six new public streets, including New Public Street A, which have been evaluated for environmental impacts throughout the Draft EIR. As discussed in Section 3.13, "Transportation," impacts associated with the development of the six new roadways, including New Public Street A, were determined to be less than significant because the new roadways would be designed in accordance with City design standards established in the Rancho Cucamonga Municipal Code (RCMC), which includes provisions for providing adequate lighting and safety features, as applicable. As part of the project building and design process, the City Traffic Engineer has review the proposed project's new roadways and has found them to be satisfactory to City standards and requirements; therefore, no additional safety features (i.e., guardrails) will be required to separate the project from the SCRRA's right-of-way. No revisions to the Draft EIR are required in response to this comment.

Comment 2-4

Any proposed new crossing construction project will require authorization from the CPUC and must also conform to the goals of the CPUC's Environmental and Social Justice Action Plan. This includes improving safety and access to transportation, improving local air quality and public health, and expanding outreach and public participation opportunities in disadvantaged communities. For more information, please visit https://www.cpuc.ca.gov/esjactionplan.

RCEB staff is available to discuss any potential safety impacts or concerns at the crossings and address any questions from the County.

If you have any questions, please contact Sergio Licon at (213) 503-4866, or sergio.licon@cpuc.ca.gov.

Response 2-4

The comment provides additional information about CPUC's authorization process for new crossing projects as well as contact information should additional questions arise related to the existing railroad crossing. This comment is not related to the adequacy of the CEQA document; therefore, no revisions to the Draft EIR are necessary in response to this comment.

Letter 3 South Coast Air Quality Management District

Sam Wang, Program Supervisor
November 13, 2025

Comment 3-1

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on 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 have provided a brief summary of the project information and prepared the following comments, organized by topic of concern.

Summary of Project Information in the Draft EIR

Based on the Draft EIR, the Proposed Project consists of the demolition and site clearing of existing paved surfaces, followed by the construction and operation of five warehouse distribution buildings.[1] The Proposed Project would result in the development of approximately 1,830,719 gross square feet of industrial warehouse space[2] on a 94-acre site[3] located at 12451 Arrow Route Road.[4] At full buildout, the Proposed Project would include 282 loading docks[5] and would generate an estimated 413 heavy-duty truck trips, 155 medium-duty truck trips, and 116 light-duty truck trips per day, for a total of approximately 684 daily truck trips during operation.[6] Of the total truck trips, approximately 388 would involve vehicles equipped with transport refrigeration units (TRUs).[7] Approximately 10 percent of the total building floor area would be designated for cold storage use.[8] Based on a review of an aerial photograph, the nearest sensitive receptors (i.e., residential uses) are located approximately 1,600 feet northeast of the Proposed Project site. Construction activities are anticipated to occur over approximately 18 months, beginning in January 2026 and concluding in July 2027.[9]

[1] Draft EIR. p. 2-14.
[2] Ibid.
[3] Ibid. p. 3.10-3.
[4] Ibid. p. ES-1.
[5] Ibid. p. 2-31.
[6] Ibid. p. 3.2-18.
[7] Ibid. p. 3-2-19.
[8] Ibid. p. 2-17.
[9] Ibid. p. 2-35.

Response 3-1

The comment introduces the commenter and provides an overview of the proposed project. This comment is not related to the adequacy or accuracy of the CEQA document; therefore, no revisions to the Draft EIR are necessary in response to this comment.

Comment 3-2

South Coast AQMD Comments

Potentially Underestimated Construction Emissions

Chapter 2 (Project Description) of the Draft EIR acknowledges that recent and ongoing site investigations have identified multiple areas where contaminant concentrations exceed industrial screening levels. Detected contaminants include volatile organic compounds (VOCs) in soil vapor, diesel range organics (DRO), and polychlorinated biphenyls (PCBs) in shallow soils.[10] Approximately 3,500 cubic yards of soil are anticipated to require removal during grading activities.[11] Additionally, Section 3.8 (Hazards and Hazardous Materials) identifies five distinct Areas of Concern (AOCs)[12]:

- AOC-1: Soils containing total petroleum hydrocarbons (TPH) as DRO;
- AOC-2: Shallow soils with elevated concentrations of metals (lead and cadmium);
- AOC-3: Shallow soils with elevated arsenic concentrations;
- AOC-4: Soils, concrete, and asphalt containing PCBs; and
- AOC-5: Soil vapor containing VOCs.

Although Mitigation Measure (MM) 3.8-2 requires implementation of a Remedial Action Plan prior to construction,[13] the Draft EIR does not include an evaluation of potential air quality impacts associated with cleanup and remediation activities. These activities could result in emissions of fugitive dust, VOCs, and other hazardous air pollutants during the disturbance, excavation, handling, or treatment of contaminated materials. Given the potential for contaminated soil disturbance, it is recommended that the Lead Agency review and ensure compliance with all applicable South Coast Air Quality Management District (South Coast AQMD) regulations, specifically Rule 1166 (Volatile Organic Compound Emissions from Decontamination of Soil)[14] and Rule 1466 (Control of Particulate Emissions from Soils with Toxic Air Contaminants).[15] Adherence to these rules will ensure that potential emissions of VOCs and toxic particulates are effectively minimized and controlled in accordance with South Coast AQMD requirements.

[10] Ibid. p. 2-4.
[11] Ibid. p. 2-36.
[12] Ibid. p. 3.8-10.
[13] Ibid. p. 3-8-15.
[14] South Coast AQMD, Rule 1166 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf
[15] South Coast AQMD, Rule 1466 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf

Response 3-2

This comment suggests that project construction modeling omits the removal of contaminated soil and that construction emissions may be underestimated. The comment also recommends that the Lead Agency review and ensure compliance with all applicable SCAQMD regulations, specifically Rules 1166 and 1466. As described in Chapter 2, "Project Description," of the Draft EIR, the remediation of the project site as part of the site preparation stage was accounted for in the description of the project and included in the environmental analysis of the proposed project throughout the Draft EIR. However, based on the comment, the SCAQMD rules listed in the comment have been reviewed for compliance and as a result, the CalEEMod modeling of the cleanup and remediation activities was updated to account for compliance with these rules and longer truck trip lengths that are reflective of the distances to the hazardous waste disposal sites located in Kern County identified in the Remedial Action Plan prepared for the project site. Based on the modeling update, the cleanup and remediation activities generated an additional 0.1 lb/day of VOC, 7 lb/day of NO_x, 4 lb/day of CO, 2 lb/day of PM_{10}, 1 lb/day of $PM_{2.5}$, 0.05 lb/day of SO_2, and 145 annual $MTCO_2e$. In addition, an update to the project construction fuel usage was also required based on the modeling update. These changes are reflected within the Air Quality, Energy, and Greenhouse Gas (GHG) Emissions and Climate Change sections as shown in Chapter 3, "Revisions to the Draft EIR," of this Final EIR.

Comment 3-3

Cleanup activities will likely involve the use of heavy-duty, diesel-fueled trucks for soil export and result in emissions from truck hauling activities and vehicle trips by workers that will be required to conduct cleanup/remediation activities. Additionally, the cleanup/remediation activities will likely require the use of additional equipment that may be different from typical equipment for grading and site preparation for construction. Based on the emission calculations from the California Emissions Estimator Model (CalEEMod) detailed report, a one-way truck trip length of 20 miles was relied upon to quantify the construction emissions from hauling activities. If the cleanup/remediation activities include the removal and disposal of contaminated soil, depending on the type of contamination, contaminated soil may need to be transported to a permitted hazardous waste disposal facility located outside San Bernardino County, which could require a one-way trip that would have a substantially greater travel distance beyond 20 miles.

To ensure an accurate quantification of construction-related emissions, including the cleanup activities, particularly for regional criteria pollutants and greenhouse gases, the Lead Agency is recommended to revise the CalEEMod[16] model inputs to reflect the actual distance to a specified permitted hazardous waste disposal facility. The selected trip length should be clearly disclosed and explained in the Final EIR. Should the Lead Agency elect not to revise the 20-mile haul distance, a detailed rationale supported by substantial evidence in the administrative record must be provided to demonstrate the appropriateness of the assumption in the context of the project-specific conditions.

[16] CalEEMod free of charge available at https://www.caleemod.com/

Response 3-3

This comment states that the contaminated soil from the cleanup and remediation activities would require the soil to be hauled to a permitted hazardous waste disposal facility that would likely be located outside San Bernardino County. See Response to Comment 3-2. As such, the CalEEMod modeling for the cleanup and remediation activities has been updated to include longer truck trip lengths that are reflective of the distances to the hazardous waste disposal sites located in Kern County identified in the Remedial Action Plan prepared for the project site and the Draft EIR has been revised to reflect this.

Comment 3-4

Inappropriate Use of South Coast AQMD's Mass Rate Localized Significance Threshold Look-Up Table to Analyze the Proposed Project's Localized Air Quality Impact

The analysis of localized significance thresholds (LSTs) in the Draft EIR appears to inappropriately rely on the South Coast AQMD LST screening tables to assess localized air quality impacts associated with both construction and operational activities. However, as outlined in Table 3-2 of the South Coast AQMD Final LST Methodology guidance,[17] the screening tables are not intended for projects with a disturbed area exceeding five acres. Given that the Proposed Project encompasses approximately 94 acres, the reliance on the screening tables is inappropriate because the localized pollutant concentrations are likely underestimated.

To ensure an accurate and technically robust assessment of potential localized air quality impacts, the Lead Agency is recommended to 1) conduct project-specific air dispersion modeling, which quantifies the concentrations of criteria pollutants at sensitive receptor locations during both the construction and operational phases; and 2) incorporate the results into the Final EIR.

[17] South Coast AQMD's Final LST Methodology available at https://www.aqmd.gov/docs/default-source/cega/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf

Response 3-4

This comment states that because the project site is 94 acres, the 5-acre LST thresholds were incorrect to use. SCAQMD's LST guidance includes screening tables that identify the amount of mass emissions that may be generated by project construction and operation that may safely be assumed to not result localized air quality impact. SCAQMD notes that their modeling is conservative by design, and that 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)." Therefore, the LSTs provide the maximum amount of emissions that can be emitted from within the project boundary without violating concentration-based ambient air quality standards. Thus, if a project's emission levels are below the LSTs, those emissions will not result in a localized air quality impact.

As discussed in Section 3.2, "Air Quality," of the Draft EIR, the LST analysis evaluated the proposed project's potential criteria air pollutant emissions at sensitive receptor locations by comparing the project on-site emissions against the LSTs for a 5-acre project, and found both that construction and operation would result in emissions below the LSTs. While the proposed Project site is approximately 94 acres, it is important to note that construction would not occur on the entire project site at all times. Rather, active disturbance areas would be much less on any given day. Similarly, from an operational perspective, most of the equipment usage and truck activity would emanate from areas in and around the loading docks and within the warehouse areas. The Draft EIR's use of the 5-acre LST for a project greater than 5 acres is considered conservative because this approach assumes all emissions are generated in a smaller area (5 acres) than would actually occur (the 94-acre project site). This approach is conservative (i.e., likely to overestimate local air quality impacts) because emissions generated in a larger area have a lower emissions intensity (e.g., grams per square meter) than emissions generated over a smaller area. Therefore, because the LST analysis is conservative, and because the analysis determined that construction and operational emissions would be below SCAQMD's LSTs for a 5-acre site, no revisions to the Draft EIR are necessary in response to this comment.

Comment 3-5

Truck Idling Duration and Emissions Modeling

According to the technical file provided by the Lead Agency labeled Rancho Trucks Mass Emissions - Site 1, an assumption of 15 minutes of idling per truck per day was used to estimate diesel particulate matter (DPM) emissions for the health risk assessment (HRA).[18] However, the actual idling times may be longer in duration since the Proposed Project is anticipated to involve a total of 684 truck trips per day. Moreover, it is reasonable to expect that individual trucks may experience extended periods of idling due to on-site queuing, security checks, staging, loading, and unloading operations, among other factors, particularly during peak hours or in congested circulation areas. As such, a 15-minute idling duration may underestimate actual on-site idling behavior and, consequently, DPM emissions, which are a key contributor to localized health risks.

While the California Air Resources Board (CARB) limits diesel truck idling to five minutes as set forth in the Airborne Toxic Control Measure (ATCM), an exemption from this requirement is allowed for trucks equipped with engines that meet the optional low-NO_x idle emission standard, which is typically applicable to model year 2008 and newer trucks. These vehicles, often referred to as "clean idle" certified, are permitted to idle longer than five minutes when situated more than 100 feet from sensitive land uses such as homes and schools.[19] Furthermore, CARB's EMFAC2021 Volume III Technical Document (Table 4.4.2-5) indicates that heavy-duty trucks may idle for up to five hours at a single location under certain conditions.[20] For these aforementioned reasons, as a practical matter, the idling duration for onsite heavy-duty trucks visiting the Proposed Project site could idle for a much longer duration than what was analyzed in the Draft EIR. Thus, the HRA may have substantially underestimated the full extent of operational health risks associated with the DPM emissions from the anticipated onsite heavy-duty truck activities.

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

[18] Provided Technical File labeled Rancho Trucks Mass Emissions - Site 1.

[19] CARB, Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling was promulgated in Chapter 13 of the California Code of Regulations, Section 2485: Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling, https://ww2.arb.ca.gov/sites/default/files/2022-06/13_CCR_2485_OAL_06222022-2_ADA_06272022_0.pdf

[20] CARB, EMFAC2021 Volume III Technical Document, Table 4.4.2-5, p. 161., available at https://ww2.arb.ca.gov/sites/default/files/2021-03/emfac2021_volume_3_technical_document.pdf

Response 3-5

This comment states that the assumed 15 minutes of idling was the incorrect assumption to use due to the quantities of truck trips associated with the project. Additionally, to ensure the project fully assesses the health risk impact the idling times for truck should be increased to 30 minutes or provide evidence that 15-minute idling is appropriate to use for this project. The assumptions for truck idling and truck travel on-site are based on information provided in a recent comment letter submitted by SCAQMD on a separate project, the Draft EIR for the Proposed Perris Ethanac Travel Center Project (SCH No. 2024010850). In that comment letter, SCAQMD stated that it is reasonable to assume a truck may be left running for at least 15 minutes. While the City acknowledges that the ATCM provides an exemption from the requirement to limit idling to 5 minutes, Mitigation Measure 3.2-2d, "Idling Limits During Operations," would ensure that all medium- and heavy-duty trucks that visit the project site limit their idling by shutting down engines when not in use, and limit idling to a maximum idling time of less than 3 minutes at any given location and a total of 15 minutes total within the project site for each truck visit. Additionally, truck idling makes up only two percent and 10 percent of the driving health risk in the unmitigated and mitigated scenarios, respectively. If the idling time were to be increased from 15 minutes to 30 minutes, the health risk per million people would increase from 28.13 to 28.35, and 2.15 to 2.37, for the unmitigated and mitigated scenarios, respectively (refer to Appendix C). Thus, this would have a negligible and non-significant impact on the project and health risk near the project area. Therefore, the health risk assessment within the Draft EIR is adequate and no changes to the Draft EIR are warranted in response to this comment.

Comment 3-6

Outdated Meteorological Data in the HRA Modeling

Section 3.2 (Air Quality) of the Draft EIR indicates that the representative meteorological station for the HRA is assumed to be the Fontana station (FONT).[21] In addition, based on the technical files provided by the Lead Agency, the MET data used in modeling is the FONT version 9.

It should be noted that this data corresponds to Version 9 of South Coast AQMD's AERMOD-ready MET dataset, which is no longer available or recommended for use. South Coast AQMD released an updated version of AERMOD-ready meteorological data (Version 11) in October 2024.[22] This updated dataset was developed using the U.S. EPA's AERMET processor (Version 22112), along with AERMINUTE (Version 15272) and AERSURFACE (Version 20060), and reflects current regulatory guidance and processing methodologies.

To ensure technical accuracy, transparency, and consistency with the current South Coast AQMD recommendations, the Lead Agency is recommended to:

- Reassess the selection of meteorological data using the latest Version 11 dataset;
- Revise the HRA modeling inputs accordingly; and
- Include updated air quality modeling results in the Final EIR

This approach will ensure that air dispersion modeling is based on the most recent and appropriate meteorological data, thereby supporting a robust and defensible environmental analysis.

[21] Ibid. p. 3.2-21.
[22] South Coast AQMD AERMOD-Ready MET Data Files available at https://www.aqmd.gov/assets/aermet/AERMET_files_And_HRA_Tool.html

Response 3-6

This comment states that version 9 of the Fontana Station is outdated and should be updated to the newest meteorological data. Version 9 was the most updated meteorological data at the time the analysis began for the project as the Notice of Preparation (NOP) was released on November 1, 2023 with analysis beginning shortly after. The FONT version 9 data was downloaded on June 27, 2024, which was before the release of Version 11 in October 2024. CEQA does not require lead agencies to update analyses based on new models or tools that are released during environmental review, provided that the EIR, when looked at as a whole, provides a reasonable, good-faith disclosure and analysis of the project's environmental impacts and the approach relied upon by the lead agency provides for an accurate and reasoned analysis of project impacts. Moreover, an EIR need not follow the analytical methods recommended by regulatory agencies or other interested agencies, as long as the method of analysis employed is supported by substantial evidence. Regardless, updating modeling with the newer meteorological data would have negligible effects on modeled outcomes and would not change any conclusions in the Draft EIR. When comparing the Fontana meteorological data in Version 9 to Version 11, Version 9 (used in the Draft EIR) and version 11 show the same predominant wind direction (primarily from the west/southwest, with similar average wind speeds with periodic winds out of the northeast) and similar average wind speed (2.32 meters per second in Version 9, 2.20 meters per second in Version 11), but Version 9 shows more calm hours (3.79 percent of the time) than Version 11 (0.86 percent of the time). For the most part, lower wind speeds lead to higher pollutant concentrations near the source, and Version 9 includes more calm hours than the newer version. Therefore, the new data would not change the severity of the impacts nor the significance conclusions. Thus, FONT version 9 was the appropriate data to use. No changes to the Draft EIR are warranted in response to this comment.

Comment 3-7

Underestimation of Ground-Level Pollutants Near Buildings in HRA

South Coast AQMD staff's review of the air dispersion modeling files indicates that the industrial buildings were not incorporated into the building downwash component of the AERMOD dispersion model for the operational scenario. Excluding building downwash can lead to an underestimation of ground-level pollutant concentrations in the vicinity of on-site structures. Therefore, the Lead Agency is recommended to incorporate all relevant industrial buildings into the building downwash analysis to more accurately characterize ground-level pollutant concentrations and include the updated modeling results and findings in the Final EIR.

Response 3-7

This comment states that building downwash was not included in the modeling and should be included to more accurately represent ground-level pollutant concentrations. According to Section 3.3.9 of the AERMOD User's Guide: "…the AERMOD model include algorithms to model the effects of buildings downwash on emissions from nearby or adjacent point sources. The building downwash algorithms do not apply to volume or area sources" (EPA 2024). No point sources were assumed in the modeling. As described in Section 3.2.3 of Section 3.2, "Air Quality," truck travel on-site and off-site, as well as truck emissions along the loading dock areas, were represented in AERMOD as various strings of volume sources, while on-site equipment were represented as an area source equal to the site of the project site. No point sources were assumed, and therefore, inclusion of building downwash would have no effect on the analysis. As such, the air quality analysis in the Draft EIR is adequate and no changes to the Draft EIR are warranted in response to this comment.

Comment 3-8

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, the following mitigation measures and project design considerations are recommended to be incorporated into the Final EIR.

Mitigation Measures to Reduce Operational Air Quality Impacts from Mobile Sources

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

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

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

3. Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the Final EIR. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the Proposed Project through CEQA prior to allowing this higher activity level.

4. Provide electric vehicle (EV) charging stations or, at a minimum, provide electrical infrastructure, and electrical panels should be appropriately sized. Electrical hookups should be provided for truckers to plug in any onboard auxiliary equipment.

Response 3-8

This comment states that all mitigation measures that go beyond what is required by law are required by CEQA to eliminate AQ impacts. Then the comment suggests four possible mitigation measures to reduce the air quality impact from mobile emissions. As concluded in Section 3.2, "Air Quality," of the Draft EIR, the proposed project would only result in a significant operational air quality impact in regard to reactive organic gases (ROG). The first mitigation measure offered in the comment requires zero emissions (ZE) or near zero emissions (NZE) on-road haul trucks with natural gas engines to meet CARB's adopted NO_x emission standards, which would not affect ROG generation during project operations. This mitigation measure was considered but not incorporated because it would not affect the project's impact significance. Additionally, the proposed project includes Mitigation Measure 3.2-2b (Zero Emissions Electrical Design and Operation) which will encourage ZE and NZE on-road haul trucks by providing "EV Ready" and "EV Capable" parking spaces. The second mitigation measure offered in the comment would require a phase-in

schedule to incentivize the use of cleaner operating trucks. This mitigation measure is redundant to Mitigation Measure 3.2-2b included in the Draft EIR as it would incentivize cleaner operating trucks by incorporating "EV Ready" and "EV Capable" parking spaces. Additionally, this mitigation measure would also be similar to Mitigation Measure 3.2-2c (Transport Refrigerant Unit Electric Hookups for Cold Storage Uses) as Mitigation Measure 3.2-2c would require transportation refrigeration units (TRUs) to be plugged in, thereby eliminating the need to run TRUs on diesel. This mitigation measure was considered but not incorporated for these reasons discussed above as it would not reduce any significant adverse air quality impacts. The third mitigation measure offered in the comment would limit the amount of daily trucks allowed at the project site. Mitigation Measure 3-2.2d (Idling Limits During Operations) would reduce the number of trucks idling at the project site at any given time. Additionally, in the mitigated operational scenario, medium and heavy-duty trucks each make up less than 1 lb/day of ROG. Thus, reducing the number of trucks onsite would not change the significance determination for Impact 3.2-2. The final mitigation measure offered in the comment would provide EV charging stations or at least electrical infrastructure for truckers to plug into. The proposed project will already provide 10 percent "EV Ready" parking spaces, and five percent "EV Installed" parking spaces from Mitigation Measure 3.2-2b as stated above. Thus, this measure is already incorporated into the project's mitigation measures. As such, the mitigation measures included in the Draft EIR for air quality are adequate and no updates to the Draft EIR are warranted to respond to this comment.

Comment 3-9

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.

Response 3-9

This comment offers mitigation measures for operational area sources that include maximizing the use of solar arrays, using light colored paving and roofing materials, and utilizing only Energy Star heating, cooling, and lighting devices/appliances. As described in Chapter 2, "Project Description", of the Draft EIR, the proposed project includes a minimum of 15 percent of its roof coverage to solar panels and will use solar reflective roofing with a solar reflective value of 78 or greater. The project also intends to seek LEED silver certification. Thus, the project has already incorporated each of the measures suggested in the comment or an adjacent measure similar to those offered by SCAQMD. No updates to the Draft EIR are required to respond to this comment.

Comment 3-10

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.

Response 3-10

This comment suggests project design features that could possibly be included in the project to reduce air quality and health risk impacts. These design features include clearly marked truck routes, designing the project such that truck entrances and exits are not facing sensitive receptors and will not pass by sensitive land uses, design the project such that truck check in points are within the project site boundaries, design the project such that truck traffic is as far away from sensitive receptors as possible, and providing overnight truck parking inside the project site. The first design feature provided in the comment is already indirectly incorporated into the project's circulation plan, which will require trucks to drive within the site's internal circulation system avoiding areas closest to sensitive receptors. The second, third and fourth design features offered in the comment propose to design the proposed project such that the truck entrances and exits are not facing sensitive receptors, trucks will not travel past sensitive land uses to enter or leave the proposed project site, queuing be restricted outside the project site, and truck traffic inside the proposed project site be directed as far away from sensitive receptors as possible. These mitigation measures would not change the significance determination of any of the project impacts as the Proposed Project is already under SCAQMD's cancer risk threshold after implementation of mitigation. The last mitigation measure offered would restrict overnight truck parking in sensitive land uses by providing overnight truck parking inside the Proposed Project Site. These mitigation measures were considered, but for the reasons discussed above, were ultimately not included as part of the project. No updates to the Draft EIR are required to address this comment.

Comment 3-11

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

1. State of California – Department of Justice: Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act23
2. South Coast AQMD 2022 Air Quality Management Plan,24 specifically:
    a) Appendix IV-A – South Coast AQMD's Stationary and Mobile Source Control Measures
    b) Appendix IV-B – CARB's Strategy for South Coast
    c) Appendix IV-C – SCAG's Regional Transportation Strategy and Control Measure
3. United States Environmental Protection Agency (U.S. EPA) Transportation, Air Quality, and Climate Change.25

[23] 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

[24] 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

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

Response 3-11

This comment suggests the lead agency review the provided references that pertain to possible mitigation measures and project design features the project could incorporate. As described in Chapter 2, "Project Description," of the Draft EIR, the project has already included many of the warehouse design considerations and best practices included in the California Department of Justice's (CA DOJ's) best warehouse practices, such as providing adequate onsite parking, analyzing project impacts fully, requiring Tier 4 engines, using electric hand tools, etc. The *State of California – Department of Justice: Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act* provides additional design considerations and mitigation measures for air quality, greenhouse gas, noise and traffic impacts, most of which were suggested above in Comments 3-8 through 3-10. Some of the design features and mitigation measures offered in this document include siting warehouse facilities so that the property lines are at least 1,000 feet from the nearest sensitive receptor, using electric-powered hand tools, forklifts, and pressure washers, and providing electrical hook ups to the power grid rather than use of diesel-fueled generators to supply their power, and forbidding trucks from idling for more than 3 minutes and requiring operators to turn off engines when not in use. However, as discussed in the responses to Comments 3-8 through 3-10, the

suggested design features and mitigation measures are already incorporated in the project, or were considered but ultimately not included in the project either for feasibility reasons or because the design feature or mitigation measure would not change a significance determination for a project impact. In addition, the SCAQMD *2022 Air Quality Management Plan* was evaluated under Impact 3.2-1 and the proposed project was found to be consistent with the assumptions and strategies in the AQMP. Lastly, the EPA Transportation, Air Quality, and Climate Change webpage offers information and recent announcements about transportation, air quality, and climate change policies and mitigation strategies. These documents and references were reviewed, but ultimately none of the design features and mitigation measures were included in the project for feasibility reasons or because the design feature or mitigation measure would not change a significance determination for a project impact. No changes to the Draft EIR are required to respond to this comment.

Comment 3-12

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

On May 7, 2021, South Coast AQMD's Governing Board adopted Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program,[26] and Rule 316 – Fees for Rule 2305.[27] Rules 2305 and 316 are new rules that will reduce regional and local emissions of nitrogen oxides (NO_x) and particulate matter (PM), including diesel PM. These emission reductions will reduce public health impacts for communities located near warehouses from mobile sources that are associated with warehouse activities. Also, the emission reductions will help the region attain federal and state ambient air quality standards. Rule 2305 applies to owners and operators of warehouses greater than or equal to 100,000 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 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. Since the Proposed Project consists of the development of a 1,803,729 square foot warehouse, specifically for buildings 4 and 5 that are greater than 100,000 square feet, the Proposed Project's warehouse owners and operators will be required to comply with Rule 2305 once the warehouse is occupied. Therefore, South Coast AQMD staff recommends that the Lead Agency review South Coast AQMD Rule 2305 to determine the potential WAIRE Points Compliance Obligation for future operators and explore whether additional project requirements and CEQA mitigation measures can be identified and implemented at the Proposed Project that may help future warehouse operators meet their compliance obligation. South Coast AQMD staff is available to answer questions concerning Rule 2305 implementation and compliance by phone or email at (909) 396-3140 or waire-program@aqmd.gov. For implementation guidance documents and compliance and reporting tools, please visit South Coast AQMD's WAIRE Program webpage.[28]

[26] South Coast AQMD Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program available at: http://www.aqmd.gov/docs/default-source/rule-book/reg-xxiii/r2305.pdf.
[27] South Coast AQMD Rule 316 – Fees for Rule 2305 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-iii/r316.pdf
[28] South Coast AQMD WAIRE Program available at: http://www.aqmd.gov/waire.

Response 3-12

This comment states that the proposed project would be required to comply with SCAQMD Rules 2305 and 316. The comment also recommends that the proposed project consider the potential for mitigation through WAIRE Point Compliance Obligation for future operators and explore whether the proposed project would implement this to help future warehouse operators meet their compliance obligations. The air quality mitigation measures included in the Draft EIR were developed based in part on the WAIRE Program, which includes compliance with SCAQMD Rules 2305 and 316. In addition, the City and applicant acknowledge that the proposed project's future tenants will be required to comply with SCAQMD Rule 2305, Warehouse Indirect Source Rule, WAIRE Program, and Rule 316, Fees for Rule 2305. No additional analysis or changes to the Draft EIR are required in response to this comment.

Comment 3-13

South Coast AQMD Air Permits and Role as a Responsible Agency

If implementation of the Proposed Project would require the use of new stationary and portable sources, including but not limited to emergency generators, fire water pumps, boilers, etc., one or more air permits from South Coast AQMD will be required. 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,[29] Rule 203 – Permit to Operate,[30] Rule 401 – Visible Emissions,[31] Rule 402 – Nuisance,[32] Rule 403 – Fugitive Dust,[33] Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,[34] Rule 1113 – Architectural Coatings,[35] Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil,[36] Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants,[37] and Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines,[38] etc.

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

CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of the process for conducting a review of the Proposed Project and issuing discretionary approvals. Moreover, it is important to note that if a Responsible Agency determines that a CEQA document is not adequate to rely upon for its discretionary approvals, the Responsible Agency must take further actions listed in CEQA Guideline Section 15096(e), which could have the effect of delaying the implementation of the Proposed Project. In its role as CEQA Responsible Agency, the South Coast AQMD is obligated to ensure that the CEQA document prepared for this Proposed Project contains a sufficient project description and analysis to be relied upon in order to issue any discretionary approvals that may be needed for air permits.

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

[29] South Coast AQMD, Rule 201 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf
[30] South Coast AQMD, Rule 203 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf
[31] South Coast AQMD, Rule 401 available at https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf
[32] South Coast AQMD, Rule 402 available at https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf
[33] South Coast AQMD, Rule 403 available at https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403
[34] South Coast AQMD, Rule 1110.2 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf
[35] South Coast AQMD, Rule 1113 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf
[36] South Coast AQMD, Rule 1166 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf
[37] South Coast AQMD, Rule 1466 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf
[38] South Coast AQMD, Rule 1470 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf

Response 3-13

This comment identifies the potential new stationary and portable sources the proposed project may include, and the required permits associated with those sources. The comment also explains SCAQMD's role as a responsible agency and states that the Final EIR should include a discussion about any and all new stationary and portable equipment requiring SCAQMD air permits, provide the evaluation of their air quality and greenhouse gas impacts, and identify SCAQMD 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). The comment also provides contact information for SCAQMD's Engineering and Permitting staff. At this time, the proposed project is not expected to require the use of new stationary and portable sources that would be subject to permitting from the SCAQMD. However, the future tenant has not yet been identified, and there is a possibility that currently unknown future tenants could require a permit from SCAQMD, in which case the SCAQMD could serve as a responsible agency under CEQA. As shown on page 2-39 in Section 2.6, "Potential Permits and Approvals Required," in Chapter 2, "Project Description," of the Draft EIR, SCAQMD has been listed as a potential Responsible Agency for the proposed project. No changes to the Draft EIR are required in response to this comment.

Comment 3-14

Conclusion

As set forth in Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), the Lead Agency shall evaluate comments from public agencies on environmental issues and prepare a written response at least 10 days prior to certifying the Final 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.

Thank you for the opportunity to provide comments. South Coast AQMD staff are available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Danica Nguyen, Air Quality Specialist, at dnguyen1@aqmd.gov should you have any questions.

Response 3-14

The comment describes the requirements for addressing comments from public agencies set forth in Public Resources Code Section 21092.5(a) and State CEQA Guidelines Section 15088(a-b). This comment is not related to the adequacy of the CEQA document; therefore, no revisions to the Draft EIR are necessary in response to this comment. Pursuant to Section 15088 of the CEQA Guidelines, the Final EIR along with these responses to comments will be provided to SCAQMD at least 10 days prior to consideration of the Final EIR.

Letter 4 Blum, Collins & Ho LLP

Vashon Simien
November 13, 2025

Comment 4-1

Thank you for the opportunity to comment on the Environmental Impact Report (EIR) for the proposed Arrow Commerce Center 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.

Response 4-1

The comment provides an introduction to the comment letter and notifies that the commenter is providing comments on behalf of the Golden State Environmental Justice Alliance. The comment also requests that the Golden State Environmental Justice Alliance be added to the public interest list to receive any subsequent environmental documentation associated with the proposed project. The commenter will be included in the distribution list of any subsequent environmental documentation for the proposed project. The comment does not raise an issue with the adequacy of the Draft EIR and therefore, no further response is required.

Comment 4-2

1.0 Summary

The proposed project includes the demolition and site clearing of existing paved surface areas and site grading, excavation, and the development of five 2-story industrial buildings. The five industrial buildings consist of approximately 1,830,729 gross square feet of new building floor area for warehouse distribution and associated office space. The project also includes loading docks for truck trailers, 968 vehicle parking spaces, 444 truck trailer parking spaces, 6 new public streets, water quality basins, utility infrastructure, and exterior lighting and signage. Of the five proposed buildings included in the proposed project, Buildings 1, 2, and 3 are anticipated to operate Monday through Friday between 4:00 a.m. and 8:00 p.m. (16 hours per day, 80 hours per week), and Buildings 4 and 5 are anticipated to operate 24 hours a day, seven days a week. The proposed project would accommodate approximately 1,408 employees daily.

The proposed project requires the City's approval of the following entitlements for the proposed project:

1. Zoning Map Amendment pursuant to Section 17.38.080 (Large Warehouse Overlay Zone) of the RCMC to apply the overlay to the project site;
2. Design Review Application;
3. Conditional Use Permit (CUP) and Master Plan application pursuant to Section 17.30.030 (Allowed Land Uses and Permit Requirements) of the Rancho Cucamonga Municipal Code (RCMC); and,
4. Development Agreement.

Response 4-2

The comment provides an overview of the proposed project, including the City entitlements required for approval. The comment does not raise an issue with the adequacy of the Draft EIR and therefore, no further response is required.

Comment 4-3

1.1 Project Piecemealing

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 proposed project is a piecemealed portion of a larger overall project to be developed by Ares/Black Creek within the City.

The EIR misleads the public and decision makers by circumventing adequate and accurate environmental analysis for the whole of the action - construction and operation of all Ares/Black Creek buildings as a whole. At minimum, piecemealed projects include the development of the DRC2021-00484[1] known as Etiwanda Commerce Center (1,214,131 sf of warehouse/industrial building area across 5 buildings), located adjacent to the south of the project site across the BNSF railroad tracks at 8996 Etiwanda Avenue. According to public entitlement records, DRC2021- 00484 was submitted to the City on 12/29/2021. The proposed project (DRC2021-00485[2]) was also submitted to the City on 12/29/2021. A third project (DRC2016-00726[3]) constructed a 611,573 square feet distribution center at 12400 Arrow Route[4], located immediately adjacent to the north of the project site across Arrow Route. Cumulatively, the proposed project and the two piecemealed projects will construct 3,648,153 sf of warehouse/industrial building area across 11 buildings.

CEQA Section 15161 describes project EIRs as examining "the environmental impacts of a specific development project. This type of EIR should focus primarily on the changes in the environment that would result from the development project. The EIR shall examine all phases of the project including planning, construction, and operation." The specific development project is the construction and operation of all Ares/Black Creek buildings as a whole, including at minimum the projects listed above.

[1] https://acaprod.accela.com/CITYOFRC/Cap/CapDetail.aspx?Module=Planning&capID1=21PLN&capID2=00000&capID3=00508&agencyCode=CITYOFRC

[2] https://acaprod.accela.com/CITYOFRC/Cap/CapDetail.aspx?Module=Planning&TabName=Planning&capID1=21PLN&capID2=00000&capID3=00509&agencyCode=CITYOFRC&IsToShowInspection=

[3] https://acaprod.accela.com/CITYOFRC/Cap/CapDetail.aspx?Module=Planning&TabName=Planning&capID1=16PLN&capID2=00000&capID3=01569&agencyCode=CITYOFRC&IsToShowInspection=

[4] https://www.loopnet.com/viewer/pdf?file=https%3a%2f%2fimages1.loopnet.com%2fd2%2fr4fT6QQdAed6abjawz29bxsNI_xsw7SZFhwEBRRiBA%2f611573%2520SF%2520Arrow%2520Route%2520DC%2520Brochure.pdf

Additionally, CEQA Section 15146 requires that the degree of specificity in an EIR "will correspond to the degree of specificity involved in the underlying activity which is described in the EIR. (a) An EIR on a construction project will necessarily be more detailed in the specific effects of the project than will be an EIR on the adoption of a local general plan or comprehensive zoning ordinance because the effects of the construction can be predicted with greater accuracy." Because there are at least three developments as part of a single construction project, the project EIR must be more detailed in the specific effects of the project.

A project EIR must be prepared which accurately represents the whole of the action without piecemealing the project into separate, smaller development projects to present unduly low environmental impacts. This is vital as the EIR for the proposed project concludes the project will result in significant and unavoidable cumulatively considerable Air Quality and VMT impacts, and is inconsistent with PlanRC (General Plan) and the RTP/SCS. The area of all three projects is within a SCAG Priority Equity Community and adjacent to a SB 535 Disadvantaged Community, meaning that the significance of the environmental impacts are felt in the most vulnerable areas of the SCAG region and State. The EIR must be revised to comply with CEQA § 15161 by preparing a Project EIR to adequately and accurately disclose the project-specific and cumulative impacts of all proposed Ares/Black Creek projects.

Response 4-3

The comment states that the Draft EIR does not accurately describe the whole of the project as the commenter suggests all Ares/Black Creek development projects be evaluated together to avoid piecemealing under CEQA. Pursuant to Section 21065 of the State CEQA Guidelines, a "project" is defined under CEQA as an activity which may cause either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, and which is any of the following:

a) An activity directly undertaken by any public agency.

b) An activity undertaken by a person which is supported, in whole or in part, through contracts, grants, subsidies, loans, or other forms of assistance from one or more public agencies.

c) An activity that involves the issuance to a person of a lease, permit, license, certificate, or other entitlement for use by one or more public agencies.

The project described in Chapter 2, "Project Description," is the whole action that is proposed under the Arrow Commerce Center project entitlement package, which, if approved by the City of Rancho Cucamonga City Council, would allow for the development of five warehouse distribution buildings on the project site. The approval of the Arrow Commerce Center project entitlement package by the City of Rancho Cucamonga City Council would not permit the development of any other Ares/Black Creek development projects proposed within the city as this entitlement package is specific to the proposed project and the project site. As such, the proposed project as described and evaluated in the Draft EIR constitutes a project in accordance with Section 21065 of the State CEQA Guidelines as it is the whole action proposed for the project site that would be entitled by the City. The proposed project is not necessary for, or dependent on, the operation of any other project, nor a reasonably foreseeable consequence of approving the project. The proposed Arrow Commerce Center Project has "independent utility" and must be considered as a separate and independent project from any others. Furthermore, all relevant cumulative projects are discussed in Chapter 4, "Cumulative Impacts," of the Draft EIR, where the potential for impacts from those cumulative projects were considered in combination with the proposed project in order to identify and mitigate, as necessary, any significant cumulative impacts. Therefore, the projects are appropriately considered separately, but addressed cumulatively. No changes to the Draft EIR are warranted in response to this comment.

Comment 4-4
2.0 Project Description

The EIR does not include floor plans, grading plans, detailed site plans, or detailed elevations. The basic components of a Planning Application include a site plan, floor plan, grading plan, and elevations. The site plan provided in Figures 2-11 has been edited for public review and does not provide any detailed information such as the earthwork quantity notes, parking requirements, site coverage, floor area ratio, legend, or key notes. The elevations in Figure 2-12 through 2-16 do not include the building colors or materials. The EIR states that, "During the grading stage approximately 255,000 cubic yards of cut and fill would be balanced on site," but does not provide any method for the public or decision makers to verify this information, such as a grading plan. Providing the grading plan and earthwork quantity notes is vital as this directly informs the quantity of necessary truck hauling trips due to soil import/export during the grading phase of construction. A revised EIR must be prepared to include wholly accurate and unedited detailed floor plan, grading plan, site plan, elevations, and project narrative for public review.

Response 4-4
The comment states that the Draft EIR does not include floor plans, grading plans, detailed site plans, or detailed elevations and that without this information, the Draft EIR does not provide the level of detail required for the public to verify project information. Pursuant to Section 15124 of the State CEQA Guidelines, the description of a project should include the precise location and boundaries of the project on a detailed map and a regional map; a statement of project objectives; a general description of the project's technical, economic, and environmental characteristics; and a statement of intended uses of the EIR, including a list of agencies that are expected to use the EIR, a list of permits and other approvals, and a list of related environmental review and consultation requirements required by federal, state, or local laws, regulations, or policies. Furthermore, Section 15124 indicates that the description of the should not supply extensive detail beyond that needed for evaluation and review of the environmental impact. As demonstrated in Chapter 2, "Project Description," of the Draft EIR, the description of the proposed project includes the information required by Section 15124, including:

- regional and local project site maps (Section 2.3, "Regional and Local Setting," pages 2-2 and 2-3),
- project objectives (Section 2.2, "Project Objectives," page 2-1),
- a general description of the project's technical, economic, and environmental characteristics (Section 2.5, "Proposed Project Characteristics," including site plan, building elevations, onsite circulation, drainage plan, and landscaping plan figures, pages 2-14 through 2-37), and
- list of agencies that are expected to use the EIR, permits and other approvals, and related environmental review and consultation requirements required by federal, state, or local laws, regulations, or policies (Section 2.6, "Potential Permits and Approvals Required," pages 2-39 to 2-40).

Specifically, Chapter 2, "Project Description," of the Draft EIR includes textual descriptions and figures of the design of the proposed project, access and circulation, provided parking spaces and requirements, water quality management and drainage, utility infrastructure, landscaping, and exterior lighting and signage. As such, the Draft EIR includes a project description consistent with the requirements of Section 15124 of the State CEQA Guidelines. No changes to the Draft EIR are warranted in response to this comment.

Comment 4-5

3.0 Environmental Setting, Impacts, and Mitigation Measures. Effects Found Not to be Significant: Population and Housing

The IS/NOP states that, "The industrial land uses proposed would be consistent with the zoning and General Plan land use designations in adopted planning documents, such as the city's General Plan, and the RCMC. As such, the proposed project would not induce substantial unplanned population growth in an area directly or indirectly due to the proposed project's introduction of new business, employees, and roads and infrastructure. This is because growth associated with proposed land uses that are consistent with the zoning and land use designations of the city are accounted for in the growth projections of the General Plan." However, there is no quantified discussion regarding the growth projections of the City's General Plan or SCAG's RTP/SCS. The EIR has not provided any substantial evidence to support the conclusion that the project is within these growth projections. Notably, the EIR also concludes in the Transportation section that the project exceeds the RTP/SCS growth projections and is inconsistent with PlanRC (General Plan). A finding of significance must be provided in a revised EIR.

SCAG's Connect SoCal Demographics and Growth Forecast[5] notes that the City will add 12,900 jobs from 2019 to 2035. Based on the EIR's calculation of 1,408 jobs, the project represents 10.9% of the City's job growth over 16 years. A single project accounting for this amount of the projected employment growth over 16 years represents a significant amount of growth. The EIR has not provided a cumulative analysis discussion of projects approved since 2019 (SCAG), General Plan adoption, and/or projects "in the pipeline" to determine if the project will exceed SCAG's employment growth forecast or the General Plan growth projections.

For example, other recent industrial projects such as 9th and Vineyard[6] (823 employees) and El Camino Project[7] (474 employees) combined with the proposed project will cumulatively generate 2,705 employees, which is 20.9% of the City's employment growth forecast through 2035 accounted for only by three 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 2019 (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.

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 8: Southeast Industrial Area of the General Plan EIR[8]. 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 the Remainder of the City (includes Focus Area 8: Southeast Industrial Area) will add 4,927 jobs from 2020-2040. The EIR's calculation of the project's 1,408 net new jobs accounts for 27.4% of all jobs in the Remainder of the City. A single project accounting for this amount of the projected employment growth over 20 years represents a significant amount of growth. The proposed project represents a significant amount of employment growth for the entire City and Focus Area [8] 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.

[5] SCAG Connect SoCal Demographics and Growth Forecast https://www.scag.ca.gov/sites/default/files/2024-05/23-2987-tr-demographics-growth-forecast-final-040424.pdf

[6] 9th and Vineyard Development Project https://ceqanet.opr.ca.gov/2019110456/4

[7] El Camino Project https://ceqanet.lci.ca.gov/2023080369/4

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

Response 4-5

The comment states that the Draft EIR does not include a quantified discussion to demonstrate whether the project is within the growth projections of the City's General Plan or Southern California Association of Governments (SCAG's) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), also referred to as the Connect SoCal 2024, and that the proposed project constitutes a significant amount of employment growth, which would indirectly induce unplanned growth in the city. In addition, the comment states the Draft EIR has not provided a cumulative analysis discussion of projects approved since 2019 (SCAG), General Plan adoption, and/or projects "in the pipeline" to determine if the project will exceed SCAG's employment growth forecast or the General Plan growth projections.

The comment incorrectly stated that the Draft EIR does not include a quantified analysis of the growth inducement potential of the proposed project as Chapter 6, "Other CEQA Considerations," evaluated direct and indirect impacts associated with population growth, increased public services, economic growth, and removal of obstacles to growth. Within Chapter 6, the growth inducement analysis compared the employment growth potential of the proposed project with the population and employment growth projections of the City's General Plan. In addition, pursuant to Section 15130(b) of the State CEQA Guidelines, evaluating the growth potential of a project compared with the growth projections of regional plans (i.e., General Plan and SCAG's RTP/SCS) constitute both project and cumulative analyses. Furthermore, in accordance with Section 15130(a)(1) of the State CEQA Guidelines, "an EIR should not discuss impacts which do not result in part from the project evaluated in the EIR"; therefore, the Draft EIR was not required to evaluate the growth potential of all projects approved within the city since adoption of the General Plan.

Table 1-1 of the City's General Plan EIR shows that approximately 21,657 jobs would be created from the baseline through buildout of the General Plan (City of Rancho Cucamonga 2021b: Table 1-1 Land Use Development Projections by Focus Area and Remainder of City for Buildout). Of the 21,657 jobs, approximately 5,122 jobs would be created in the industrial/flex section, 9,733 jobs would be created in the office sector, and 6,800 jobs would be created in the retail/commercial sector (City of Rancho Cucamonga 2021b: Table 1-1). As detailed in Appendix 5.14-1, "Growth Assumptions Memorandum," of the General Plan EIR, the majority of the 5,122 industrial/flex jobs were primarily identified for the Southeast Industrial Area, where the project site is located.

As described in Chapter 2, "Project Description", the proposed project is planned as speculative warehouse buildings with future tenants or buyers of the buildings not known at this time and for that reason, the Draft EIR conservatively calculated approximately 1,408 employees based on the average of one employee per 1,300 square feet of building space. As shown in Appendix I, "CEQA Transportation Impact Study," of the Draft EIR, employment projections were further separated into 1,239 manufacturing employees and 169 transportation employees. Based on the build out projections provided in Table 1-1 and the total 1,408 employees, the proposed project would account for approximately 27 percent of the projected industrial jobs in the "Remainder of the City". However, when comparing the proposed project's projected employee growth with the total employment growth of the General Plan, the proposed project accounts for approximately seven percent of employment growth. It should be noted that at the time of the preparation of the General Plan, the project site was operating with an existing industrial use, which were accounted in the baseline employment projections. As described in Chapter 2, "Project Description,' of the Draft EIR, the previous industrial operation had ceased in late 2021 and was demolished in 2023; therefore, this industrial operation was not considered in the baseline of the Draft EIR. For this reason, some of the 1,408 employees projected for the proposed project would backfill the existing employees accounted in the baseline of the General Plan employment growth projections.

Furthermore, while the proposed project constitutes a large portion of the anticipated industrial employment growth for the "Remainder of the City," the General Plan identified the Southeast Industrial Area for intensified industrial development. It is important to note that growth assumptions are the City's best estimate at a specific time and the growth projections assumptions were based on data collected in 2021 during the COVID-19 pandemic, which are not considered to be business-as-usual years. As shown by the cumulative industrial projects approved in the city, the amount of industrial employment growth is outpacing that projected by the General Plan but is providing jobs aligned with the total employment growth projected for the city through 2040. The City has recognized this increased growth in the industrial sector and further supported this growth by adopting an ordinance on November 2, 2022 to create the Large Warehouse Overlay Zone (Section 17.38.080 of the RCMC), which allows for intensified industrial

uses on parcels zoned as "Neo Industrial" (NI) and "Industrial Employment" (IE) with issuance of a conditional use permit (CUP) and a Master Plan for the site. The purpose of the Large Warehouse Overlay Zone (LW) is to ensure that large industrial buildings of 450,000 square feet or more are located in areas of the city with adequate public services and infrastructure and are away from sensitive receptors who may be impacted by air pollutant emissions, noise, and other impacts generated by the predominant uses in such buildings. As a Zoning Map Amendment pursuant to Section 17.38.080 (Large Warehouse Overlay Zone) of the RCMC is applicable to the proposed project, the City's Planning Department has reviewed and concurred that an intensification of industrial uses is appropriate for the project site and can be supported by existing public services and utilities.

In addition, the unemployment rate in San Bernardino County recorded for September 2025 was 5.7 percent, which is representative of the labor force around the time of the release of the Draft EIR for public review (California EDD 2025). By conservatively providing approximately 1,408 new jobs within the city, the proposed project would help to support increased job opportunities within the city and surrounding region, which would be filled by the local and regional labor force. Moreover, the proposed project would help to achieve the General Plan's vision of increasing the jobs to housing ratio in the city, where residents would be able to find employment within the city instead of commuting elsewhere in the county or surrounding Los Angeles County. However, even with increased employment growth in the industrial sector, there is no evidence to suggest that this would require the construction of additional housing or other related services that could result in significant environmental impacts.

As such, the proposed project would be aligned with the total employment growth projected by the General Plan and would be consistent with the industrial/flex employment growth for the Remainder of the City. However, when considering other industrial projects that have been approved in the industrial/flex sector since adoption of the City's General Plan, the addition of the proposed project's employment growth may exceed the projections for the Remainder of the City. While the proposed project could cause industrial/flex employment to exceed projections for the Remainder of the City, this exceedance would not result in new or additional environmental impacts than those disclosed in the General Plan EIR as the General Plan had accounted for 21,657 new jobs in the city through 2040 and individual development projects would be required under City regulations and CEQA to contribute their fair share of development impact fees to ensure infrastructure and public services are developed in time with this planned growth. Chapter 6, "Other CEQA Considerations", has been revised in Chapter 3, "Revisions to the Draft EIR" of this Final EIR to clarify how the proposed project would align with the employment growth forecasts of the City's General Plan.

Comment 4-6

3.2 Air Quality, 3.5 Energy, and 3.7 Greenhouse Gas Emissions

The EIR concludes that the project does not meet SCAQMD emissions thresholds and will result in significant and unavoidable cumulatively considerable air quality impacts due to exceeding emissions thresholds for VOC. The EIR states that, "The project and its features are consistent with SCAQMD efforts to reduce emissions Basin-wide," and that, "…because the proposed project would be consistent with the land use designations in the General Plan and other relevant policies and goals, the proposed project is consistent with the region's AQMP. As such, project related emissions are accounted for in the AQMP, which has been crafted to bring the Basin into attainment status for all nonattainment pollutants and precursors thereof." However, the EIR is internally inconsistent as it concludes in the Transportation section that the project is not consistent with the buildout of PlanRC (General Plan) nor the SCAG RTP/SCS land use scenario. As discussed at length in the Land Use and Planning section below, the proposed distribution center use is not permitted in the Neo-Industrial land use designation of the General Plan. The project also requires a Zoning Map Amendment to apply the Large Warehouse Overlay to the project site to allow more than 400,000 square feet of warehouse space. This indicates that the site was clearly not planned to accommodate the proposed project. For the foregoing reasons, the project is clearly inconsistent with the AQMP and a finding of significance must be included in a revised EIR. See also the attached air quality comments and analysis from SWAPE.

Response 4-6

This comment states that the EIR does not meet SCAQMD's emissions thresholds and will result in a significant and unavoidable cumulative air quality impact and that the proposed project is not consistent with the buildout of PlanRC (General Plan) nor the SCAG RTP/SCS land use scenario and therefore, would be inconsistent with the AQMP. As discussed in Section 3.2, "Air Quality," while the Draft EIR has included Mitigation Measure 3.2-2a (Construction Low VOC Coating) to reduce VOC emissions generated during construction to below SCAQMD's thresholds, impacts would remain significant and unavoidable. Please refer to Responses to Comment 4-5 and 4-20 regarding the project's consistency with the General Plan and SCAG's RTP/SCS and thus, the AQMP.

Comment 4-7

The EIR briefly states the project site census tract CalEnviroScreen scores, but does not meaningfully discuss their relation to the project's impacts. The EIR does not include for analysis relevant environmental justice issues in reviewing potential impacts, including cumulative impacts from the proposed project. This is in conflict with CEQA Guidelines Section 15131 (c), which requires that "Economic, social, and particularly housing factors shall be considered by public agencies together with technological and environmental factors in deciding whether changes in a project are feasible to reduce or avoid the significant effects on the environment identified in the EIR. If information on these factors is not contained in the EIR, the information must be added to the record in some other manner to allow the agency to consider the factors in reaching a decision on the project." This is especially significant as the surrounding community is highly burdened by pollution.

According to CalEnviroScreen 4.0[9], CalEPA's screening tool that ranks each census tract in the state for pollution and socioeconomic vulnerability, the proposed project's census tract (6071002207) ranks in the 93rd percentile for overall pollution burden, meaning that it is among the communities that are most severely burdened by pollution in the state. The surrounding community bears the impact of multiple sources of pollution and is more polluted than average on several pollution indicator measured by CalEnviroScreen. For example, the project census tract ranks in the 95th percentile for ozone burden, the 94th percentile for particulate matter (PM) 2.5 burden, the 63rd percentile for diesel PM burden, and 87th percentile for traffic burden. All of these environmental factors are attributed to heavy truck activity in the area. While California has strict vehicle-emissions standards, exhaust from cars and trucks is the main source of air pollution in much of the state[10]. Ozone can cause lung irritation, inflammation, and worsening of existing chronic health conditions, even at low levels of exposure[11]. Exhaust fumes contain toxic chemicals that can damage DNA, cause cancer, make breathing difficult, and cause low weight and premature births[12].

[9] https://experience.arcgis.com/experience/11d2f52282a54ceebcac7428e6184203/page/CalEnviroScreen-4_0/
[10] OEHHA Traffic https://oehha.ca.gov/calenviroscreen/indicator/traffic-density
[11] OEHHA Ozone https://oehha.ca.gov/calenviroscreen/indicator/air-quality-ozone
[12] OEHHA Traffic https://oehha.ca.gov/calenviroscreen/indicator/traffic-density

Response 4-7

The comment states that the EIR does not include an analysis for relevant environmental justice issues and states that ozone and exhaust fumes can result in human health impacts. Additionally, the comment suggests the EIR evaluate the project site and surrounding communities as it pertains to disadvantaged communities and consider the project's impacts in relation to the SCAG Priority Equity Community and SB 535 status. Analysis of environmental justice as it relates to disadvantaged communities is not considered within the purview of CEQA and is not identified as an environmental issue area in accordance with Appendix G of the State CEQA Guidelines. Inclusion of information from CalEnviroscreen is provided in the Draft EIR for informational purposes only. Section 3.2, "Air Quality," evaluates the air quality impacts associated with implementation of the proposed project, including a health risk assessment (HRA) to evaluate the risks to human health. As demonstrated in Section 3.2 of the Draft EIR, implementation of Mitigation Measures 3.2-2b through 3.2-2d would reduce lifetime cancer risk below SCAQMD's cancer risk threshold and health risk impacts were determined to be less than significant with mitigation. Furthermore, as demonstrated in Chapter 4, "Cumulative Impacts," of the Draft EIR, the project's incremental contribution to cumulative health risk would be less than cumulatively considerable. No changes to the Draft EIR are warranted in response to this comment.

Comment 4-8

The census tract also ranks in the 95th percentile for hazardous waste facility impacts and 94th percentile for solid waste facility impacts. Hazardous waste generators and facilities contribute to the contamination of air, water and soil near waste generators and facilities can harm the environment as well as people[13]. Solid waste facilities can expose people to hazardous chemicals, release toxic gases into the air (even after these facilities are closed), and chemicals can leach into soil around the facility and pose a health risk to nearby populations[14]. The census tract also bears more impacts from cleanup sites than 71% of the state. Chemicals in the buildings, soil, or water at cleanup sites can move into nearby communities through the air or movement of water[15]. The census tract ranks in the 84th percentile for toxic releases. People living near facilities that emit toxic releases may breathe contaminated air regularly or if contaminants are released during an accident[16].

Further, the census tract is a diverse community including 53% Hispanic, 21% African-American, and 5% Asian-American residents, whom are especially vulnerable to the impacts of pollution. The community has a high rate of low educational attainment, meaning 85% of the census tract residents over age 25 has not attained a high school diploma. The community also has a high rate of poverty, meaning 70% of the households in the census tract have a total income before taxes that is less than the poverty level. Income can affect health when people cannot afford healthy living and working conditions, nutritious food and necessary medical care[17]. Poor communities are often located in areas with high levels of pollution[18]. Poverty can cause stress that weakens the immune system and causes people to become ill from pollution[19]. The community also has a high rate of linguistic isolation, meaning 59% of the census tract speaks little to no English and faces further inequities as a result.

The project site is within a SCAG Priority Equity Community[20] (SCAG Census Tract 06071002207). Additionally, the census tract adjacent to the project site (6071002301 (east) is identified as a SB 535 Disadvantaged Community[21]. This indicates that cumulative impacts of development and environmental impacts in the City are disproportionately impacting these communities. The EIR does not discuss that the project site and surrounding area are disadvantaged communities, does not utilize this information in its analysis, and has not considered the project's significant environmental impacts in relation to the SCAG Priority Equity Community and SB 535 status of the project census tract and surrounding area. A revised EIR must be prepared to disclose this information and utilize it for threshold analysis throughout the document to comply with CEQA Guidelines Section 15131 (c).

[13] OEHHA Hazardous Waste Generators and Facilities https://oehha.ca.gov/calenviroscreen/indicator/hazardous-waste-generators-and-facilities
[14] OEHHA Solid Waste Facilities https://oehha.ca.gov/calenviroscreen/indicator/solid-waste-sites-andfacilities
[15] OEHHA Cleanup Sites https://oehha.ca.gov/calenviroscreen/indicator/cleanup-sites
[16] OEHHA Toxic Releases https://oehha.ca.gov/calenviroscreen/indicator/toxic-releases-facilities
[17] OEHHA Poverty https://oehha.ca.gov/calenviroscreen/indicator/poverty
[18] Ibid.
[19] Ibid.
[20] https://hub.scag.ca.gov/datasets/daa7cbaf5b064399800f3426cbb64270_0/explore?location=33.814985%2C-117.221261%2C14.86
[21] OEHHA SB 535 Census Tracts https://experience.arcgis.com/experience/1c21c53da8de48f1b946f3402fbae55c/page/SB-535-Disadvantaged-Communities

Response 4-8

The comment states that the census tract for the project area ranks in the 95th percentile for hazardous waste facility impacts and 94th percentile for solid waste facility impacts. The comment also states that the surrounding community has an especially high vulnerability to the impacts of pollution, has a high rate of low education attainment, and a high rate of poverty. As discussed in Chapter 2, "Project Description," of the Draft EIR, remediation of the project site would occur under the oversight of the California Department of Toxic Substances (DTSC) prior to construction of the proposed project, which would reduce the risks associated with onsite contaminated soils. The remediation of the project site is considered a benefit of the proposed project as it removes the onsite contaminated soils from the community. As stated in Response to Comment 4-7 above, analysis of environmental justice as it relates to disadvantaged communities is not considered within the purview of CEQA and is not identified as an environmental issue area in accordance with Appendix G of the State CEQA Guidelines. As this comment does not pertain to the accuracy or adequacy of the Draft EIR, no changes to the Draft EIR are warranted in response to this comment.

Comment 4-9

The EIR states that, "the project would be subject to the energy conservation requirements of the California Energy Code (Title 24, Part 6, of the California Code of Regulations, California's Energy Efficiency Standards for Residential and Nonresidential Buildings) and the California Green Building Standards Code (Title 24, Part 11 of the California Code of Regulations). The California Energy Code provides energy conservation standards for all new and renovated nonresidential buildings constructed in California, and the Green Building Standards Code requires solar access, natural ventilation, and stormwater capture." The State of California lists three approved compliance modeling softwares[22] for non-residential buildings: CBECC-Com, EnergyPro, and IES VE. CalEEMod and EMFAC are not listed as approved softwares. The CalEEMod and spreadsheet-based modeling in Appendix B 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. If the project applies for a building permit on or after January 1, 2026, it must comply with the 2025 Building Energy Efficiency Standards, and only CBECC is currently listed as an approved software for the updated standards[23]. 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 in a revised EIR.

[22] 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

[23] California Energy Commission 2025 Energy Code Compliance Software https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2025-energy-code-compliance-software

Response 4-9

This comment states that the CalEEMod and spreadsheet-based modeling in Appendix B does not comply with the 2022 Building Energy Efficiency Standards and underreports the project's significant Energy impacts and fuel consumption to the public and decision makers. The comment also states that the EIR did not accurately or adequately model the energy impacts in compliance with Title 24, and suggests a finding of significance must be made in a revised EIR. The building code as of the writing of the EIR analysis is the 2022 Building Energy Efficiency Standards. While the analysis assumed compliance with the 2022 standards, the project will be required to comply with the most current version of the code that is effective at the time construction begins, and it is likely that future building codes will require more efficient buildings and more renewable energy production than assumed in the EIR analysis. Therefore, the project's energy impacts that are determined to be less than significant after mitigation, may be lower than assumed in the EIR. Thus, regardless of which building code is assumed, the proposed project will not consume energy wastefully, inefficient, or unnecessarily and the proposed project will not conflict with or obstruct a state or local plan for renewable energy or energy efficiency after mitigation is incorporated. No changes to the Draft EIR are warranted in response to this comment.

Comment 4-10

The EIR relies upon Mitigation Measures 3.7-1a and 3.7-1b in the Greenhouse Gas Emissions analysis to reduce the project's energy consumption. Mitigation Measure 3.7-1a requires that, "At least 50 percent of the equipment used onsite to construct the project shall be powered by near zero emission (NZE) or zero emission (ZE) technology. Examples of NZE and ZE technologies include battery electric, renewable diesel, hydrogen, or biomethane. This requirement applies to all construction equipment greater than or equal to 50 horsepower. If NZE or ZE equipment and/or fuel options are not commercially available for the project's construction equipment needs, the applicant shall demonstrate that a minimum of three off-road equipment fleet owners/operators/fuel providers in the San Bernardino County or adjacent counties were contacted and responded that NZE or ZE equipment and/or fuel options are not commercially available for the project's heavy-duty off-road equipment needs." This indicates that compliance with this requirement is not feasible and therefore no reduction in Energy consumption can be achieved through this mitigation. Additionally, courts have upheld agency conclusions that electric drayage trucks are not yet commercially viable. (Natural Resources Defense Council, Inc. v. City of Los Angeles (2023) 98 Cal.App.5th 1176, 1223.) Since electric equipment specified to achieve reduction in Energy consumption is not commercially available, there is no possible reduction in Energy consumption associated with these mitigation measures. The efficacy of the proposed mitigation and reduction of Energy consumption associated with the CAP to achieve statewide GHG reduction goals (AB 1279 and SB 32) cannot be assured, and the project's Energy 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 quantity of Energy consumption reduced via implementation of the CAP and mitigation of the project's energy impact to less than significant is not feasible.

Response 4-10

This comment states that the proposed project should not rely on Mitigation Measures 3.7-1a and 3.7-1b because the courts have upheld agency conclusions that electric drayage trucks are not yet commercially viable. The comment also suggests the Draft EIR be revised to include a finding of significance because there is no possible assurance of the quantity of energy consumption reduced via implementation of the CAP and mitigation of the project's energy impact to less than significant is not feasible.

As discussed in Section 3.7, "Greenhouse Gas Emissions and Climate Change," of the Draft EIR, with implementation of Mitigation Measures 3.7-1a through 3.7-1c, 3.2-2b through 3.2-2c, and 3.13-2a through 3.13-2d would ensure consistency between the proposed project and the City's CAP and CARB Scoping Plan. In addition, while not required to reduce GHG emissions to a less-than-significant level, implementation of these measures would introduce design features which would also reduce GHG emissions during operations of the project. As discussed in Section 3.7, at least 50 percent of the equipment used onsite to construct the project would be powered by NZE or ZE technology. Examples of NZE and ZE technologies include battery electric, renewable diesel, hydrogen, or biomethane. This requirement applies to all construction equipment greater than or equal to 50 horsepower. If NZE or ZE equipment and/or fuel options are not commercially available for the project's construction equipment needs, the project applicant shall demonstrate that a minimum of three off-road equipment fleet owners/operators/fuel providers in the San Bernardino County or adjacent counties were contacted and responded that NZE or ZE equipment and/or fuel options are not commercially available for the project's heavy-duty off-road equipment needs. Therefore, the mitigation measure is adequate and not required to reduce operational GHG emissions. Additionally, the proposed project is not expected to be fully operational until 2027 and NZE and ZE technologies will likely become more commercially available. No changes to the Draft EIR are warranted in response to this comment.

Comment 4-11

The EIR concludes that the project will generate 27,981 $MTCO_2e$ annually, which exceeds the SCAQMD threshold of 10,000 $MTCO_2e$ annually by 2.7 times. This is a significant and unavoidable impact that the EIR attempts to circumvent by qualitatively analyzing the project in accordance with the City's CAP. The EIR concludes that, "The project would implement features that would reduce emissions and would be generally consistent with the City's CAP as well as the 2022 Scoping Plan. However, the project would not implement all relevant CAP and Scoping Plan strategies. Therefore, the proposed project would generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment or conflict with state GHG plans. This impact would be significant," and implements Mitigation Measures 3.7-1a, 3.7-1b, 3.7-1c in addition to the Mitigation Measures from the Air Quality and Transportation sections.

The City's CAP was approved as a plan for the reduction of Greenhouse Gas Emissions pursuant to State CEQA Guidelines Section 15183.5(b). Pursuant to State CEQA Guidelines Sections 15064(h)(3) and 15130(d), a lead agency may determine that a project's "incremental contribution to a cumulative effect is not cumulatively considerable if the project complies with the requirements in a previously adopted plan or mitigation program," in order to conclude the project's significant and unavoidable cumulatively considerable impacts are less than significant. However, as stated in the EIR, the project does not comply with requirements of the CAP and ultimately the CAP does not comply with CEQA Guidelines Section 15183.5(b)(1)(D) to, "Specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level."

The CAP is insufficient in achieving reductions in GHG emissions and mitigating significant GHG emissions. As an example, analysis in Table 3.7-4 with, "2. Off-Road Equipment (Strategy 1.4)" concludes the project is, "Consistent After Mitigation. Mitigation Measure 3.2-2b, in Section 3.2, "Air Quality," prescribes requirements to ensure 100% operational off-road equipment exceeding 50 hp is zero emissions or evidence is provided to the City that specific pieces are not commercially available." This indicates that compliance with this requirement is not feasible and therefore no community

benefits or reduction in GHG emissions can be achieved through implementation of the CAP. Additionally, courts have upheld agency conclusions that electric drayage trucks are not yet commercially viable. (Natural Resources Defense Council, Inc. v. City of Los Angeles (2023) 98 Cal.App.5th 1176, 1223.) Since electric equipment specified to achieve GHG reduction goals is not commercially available, there is no possible community benefit or reduction of GHG emissions associated with these measures in the CAP. The efficacy of the proposed mitigation and reduction of GHG emissions associated with the CAP to achieve statewide GHG reduction goals (AB 1279 and SB 32) cannot be assured, and the project's GHG 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 quantity of GHG emissions reduced via implementation of the CAP and mitigation of the project's GHG impact to less than significant is not feasible.

Response 4-11

This comment states that because the project emits 27,981 $MTCO_2e$ annually, the project would exceed the SCAQMD threshold of 10,000 $MTCO_2e$, that the project does not comply with requirements of the CAP, and ultimately the CAP does not comply with State CEQA Guidelines Section 15183.5(b)(1)(D) to, "Specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level." The comment also states the CAP is insufficient in achieving reductions in GHG emissions and mitigating significant GHG emissions.

As stated in Section 3.7, "Greenhouse Gas Emissions and Climate Change," of the Draft EIR, "State CEQA Guidelines do not provide numeric or quantitative significance thresholds for evaluating GHG emissions. Instead, they leave the determination of threshold significance up to the lead agency and authorize it to consider thresholds of significance previously adopted or recommended by other public agencies or experts, provided that the lead agency's decision is supported by substantial evidence" (State CEQA Guidelines Sections 15064.7[b] and 15064.7[c]). The City has not the adopted the SCAQMD 10,000 MTCO2e brightline threshold, and while this threshold is meant for evaluating new or modified permitted stationary source facilities where SCAQMD is the lead agency, the threshold provides a useful comparison to help contextualize the extent of the project's emission relative to adopted thresholds. This comparison is for informational purposes only. Because the City's CAP is considered a qualified GHG reduction strategy through 2030, this was an applicable threshold to use for this project. Under Impact 3.7-1, the project would be consistent with the City's CAP after implementation of Mitigation Measures 3.2-2b, 3.2-2c, 3.7-1a, 3.7-1b, 3.7-1c, 3.13-2a, 3.13-2b, 3.13-2c, and 3.13-2d, as these measures would reduce the amount of GHG emissions generated from construction and operation of the proposed project to ensure compliance with the City's CAP and CARB Scoping Plan. Implementation of these measures would ensure that development of the proposed project would be consistent with the City's CAP as well as the CARB Scoping Plan. No changes to the Draft EIR are warranted in response to this comment.

Comment 4-12

Further, Table 3.7-4 concludes the project is consistent with CAP consistency checklist item, "6. Transportation Demand Management (Strategy 12.1) For Multi-Family Residential and NonResidential: will the project include all of the following strategies? 'Do not exceed the minimum code requirement for parking capacity,'" because, "The proposed project would meet the parking requirements of the Rancho Cucamonga Municipal Code (Chapter 17.64, Parking and Loading Standards; 17.64.100 D.1, Trailer Parking Required)." The EIR is misleading and internally inconsistent. Table 2-2: Summary of Proposed Automobile and Truck Trailer Parking demonstrates the following:

Required Passenger Car Parking Stalls: 916

Provided Passenger Car Parking Stalls: 968

Required Trailer Parking Stalls: 282

Provided Trailer Parking Stalls: 444

Exceeds Passenger Car: 52 stalls

Exceeds Trailer: 162 stalls

Exceeds Total: 214 stalls

As shown above, the project exceeds the minimum code requirement for parking capacity for passenger cars by 52 stalls and for trailer parking by 162 stalls, 214 stalls total. The project is not consistent with the CAP and a finding of significance must be included in a revised EIR.

Response 4-12

The comment states that the project exceeds the minimum code requirements for parking capacity for passenger cars and trailer parking and thus would not be consistent with the City's CAP Consistency Checklist Item 6. The proposed project includes various measures that are consistent with this CAP measure. The project proposes internal roadway design that would enhance pedestrian access to and through the project site in accordance with PlanRC Policy MA-2.1 and MA-2.2. In addition, the proposed project will be required to prepare a Parking Management Plan in accordance with RCMC Section 17.64.070 (Parking Management Plan), which requires that all projects proposed in Neo-Industrial and Industrial Employment zones create a Parking Management Plan to minimize traffic, manage on-site circulation, and effectively allocate parking needs for each industrial site. Lastly, the project will implement Mitigation Measures 3.13-2a, 3.13-2b, 3.13-2c, and 3.13-2d, from Section 3.13, "Transportation," to ensure Transportation Demand Management strategies are implemented in line with this CAP strategy. Thus, the project would be consistent with the City's CAP. No changes to the Draft EIR are warranted in response to this comment.

Comment 4-13

CEQA Guidelines Section 15183.5(b)(2) requires that, "An environmental document that relies on a greenhouse gas reduction plan for a cumulative impacts analysis must identify those requirements specified in the plan that apply to the project, and, if those requirements are not otherwise binding and enforceable, incorporate those requirements as mitigation measures applicable to the project." The project does not comply with the CAP's GHG reduction plan requirements and attempts to implement additional mitigation to produce a less than significant finding. This does not comply with CEQA Guidelines Section 15183.5, which relies solely upon the reduction strategies of the CAP and project compliance with the CAP to achieve a less than significant impact. The strategies within the CAP are also infeasible/nonexistent technology and will not result in GHG reductions required by AB 1279 and SB 32 and therefore cannot support a less than significant finding. A revised EIR must be prepared to include a finding of significance.

Response 4-13

The comment states that the project does not comply with the City's CAP GHG reduction plan requirements and attempts to implement additional mitigation to produce a less than significant finding. State CEQA Guidelines state: "an environmental document that relies on a GHG reduction plan for a cumulative impact analysis must identify those requirements specified in the plan that apply to the project, and if those requirements are not otherwise binding and enforceable, incorporate those requirements as mitigation measures." Although the project has a significant impact before mitigation because the project would not implement all relevant City CAP and CARB Scoping Plan strategies, the project would implement Mitigation Measures 3.7-1a, 3.7-1b, 3.7-1c, 3.2-2b, 3.2-2c, 3.13-2a, 3.13-2b, 3.13-2c, and 3.13-2d to ensure the project is consistent with the City's CAP and 2022 Scoping Plan. Mitigation would require zero emissions construction and yard equipment, support EV charging for trucks and vehicles, install renewable energy, require low-GWP refrigerants, and implement TDM measures to reduce employee VMT. Implementation of these measures would ensure that development of the proposed project would be consistent with the City's CAP as well as the CARB Scoping Plan. With implementation of these mitigation measures, impacts would be reduced to less than significant. No changes to the Draft EIR are warranted in response to this comment.

Comment 4-14

3.8 Hazards and Hazardous Materials

The EIR identifies that the project site, "…is located within the Airport Influence Area (AIA) of the Ontario International Airport," and that it, "…is located within the FAA Height Notification Surface Zone, which, per Federal Aviation Regulations (FAR) Part 77, Subpar B, requires that the FAA be notified of any proposed construction or alteration having a height greater than a surface extending outward and upward at a slope of 100 to 1 for a horizontal distance of 20,000 feet from the airport runways." Therefore, the Project will need to obtain clearance from the Federal Aviation Administration (FAA) and comply with its lighting/signage restrictions and warning improvements. The EIR does not provide substantial evidence that the FAA has reviewed the project or their determination regarding hazards to flight.

The EIR states that, "The proposed warehouse complex would include new buildings ranging in height from 39 to 47 feet above ground level, which are of similar height to existing buildings in the surrounding area. Therefore, construction and operation of the proposed project would not have the potential to subject people residing or working in the project area to excess levels of aircraft noise or airport-related hazards." However, Figure 2-15: Building 4 Elevations shows the building is 54 feet 6 inches tall and Figure 2-16: Building 5 Elevations shows the building is 50 feet 6 inches tall. The EIR is internally inconsistent and has not provided any substantial evidence to support a less than significant finding, such as the FAA's review of the project and their Determination of No Hazard to Flight document. A revised EIR must be prepared to include a finding of significance.

The California Airport Land Use Planning Handbook[24] states that Airport Land Use Commission review is required "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))." The proposed project requires a Zoning Map Amendment pursuant to Section 17.38.080 (Large Warehouse Overlay Zone) of the RCMC to include the site in the Large Warehouse Overlay Zone to proceed. RC Municipal Code Section 17.22.040(B)(2) requires that when reviewing Development Code/Zoning Map Amendments the City Council, "…approves by ordinance or denies the zoning code/map amendment in accordance with the requirements of this title." Airport Land Use Commission (ALUC) review is required and has not been conducted. Delaying the ALUC review until after the EIR has been published for public comment is implementation of the project prior to CEQA review and deferred mitigation in violation of CEQA. Since the ALUC has not reviewed the project, a revised EIR must be prepared to include a finding of significance as there is no meaningful evidence presented to support a less than significant finding.

[24] California Airport Land Use Planning Handbook https://dot.ca.gov/-/media/dotmedia/programs/aeronautics/documents/californiaairportlanduseplanninghandbook-a11y.pdf

Response 4-14

The comment states that the Federal Aviation Administration (FAA) should have reviewed the project and issued a Determination of No Hazard to Flight document prior to the public circulation of the Draft EIR so those findings could have been included in the Draft EIR. In addition, the comment states that the Airport Land Use Commission (ALUC) should review the project prior to publication of the Draft EIR because the project includes a Zoning Map amendment pursuant to Section 17.38.080 (Large Warehouse Overlay Zone) of the RCMC. Lastly, the comment states by delaying the ALUC review until after the EIR has been published for public comment is implementation of the project prior to CEQA review and deferred mitigation in violation of CEQA.

As stated in Section 3.8, "Hazards and Hazardous Materials," of the Draft EIR, the project site is located within the AIA near the northern boundary curve but is not located within a Safety Zone, Noise Impact Zone, or Airspace Protection Zone (City of Ontario 2018). Pursuant to the ALUCP Policy Map 2-5, "Overflight Notification Zones," the project site is in an area requiring real estate transaction disclosure, which was provided at the time the project applicant purchased the project site. Furthermore, as established by Title 14, Part 77.9 of the Code of Federal Regulations (CFR), the FAA requires filing of notification at least 45 days prior to construction if:

- Your structure will exceed 200 feet above ground level;
- Your structure will be in proximity to an airport and will exceed the slope ratio;

- Your structure involves construction of a traverseway (i.e., highway, railroad, waterway etc.) and once adjusted upward with the appropriate vertical distance would exceed a standard of 77.9 or your structure will emit frequencies, and does not meet the conditions of the FAA Co-location Policy;
- Your structure will be in an instrument approach area and might exceed part 77 Subpart C;
- Your proposed structure will be in proximity to a navigation facility and may impact the assurance of navigation signal reception your structure will be on an airport or heliport; or
- Filing has been requested by the FAA.

As the none of these criteria apply to the proposed project, the project applicant was not required to notify the FAA at this point in the project. Moreover, while the proposed project includes a Zoning Map Amendment pursuant to Section 17.38.080 of the RCMC, that is part of the project's planning application to apply the Large Warehouse Overlay zoning to the project and does not constitute an amendment to the Zoning Code, which necessitates a review by the FAA. As such, the analysis of the Draft EIR is adequate and no changes are warranted in response to this comment.

Comment 4-15
3.10 Land Use and Planning

The project faces significant inconsistencies with statutory requirements of the Housing Crisis Act (HCA) of 2019/Senate Bill (SB) 330[25]/SB 8[26]. The HCA/SB 330/SB 8 require replacement housing sites when land designated for housing development experience changes to ensure no net loss of housing capacity. Approximately 64 acres of the project site has a General Plan land use designation of Neo-Industrial[27] that has a maximum density of 24 dwelling units per acre[28]. The approximately 64 acre area of the project site can accommodate the development of up to 1,545 dwelling units. Project implementation will result in exclusively industrial development. The site would not be used for the development of any 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 designation permits the development of up to 1,545 residential dwelling units. The lost capacity of 1,545 dwelling units is a significant environmental impact in violation of the HCA/SB 330/SB 8. The EIR must be revised to include a finding of significance due to this inconsistency.

APN 0229-121-33
30.12 acres
Residential capacity: 722 dwelling units

APN 0229-121-34
19.03 acres
Residential capacity: 456 dwelling units

APN 0229-121-35
15.32 acres
Residential capacity: 367 dwelling units

Approval of the EIR and the proposed project will result in a net loss of housing capacity of 1,545 dwelling units. This is a significant environmental impact in violation of the HCA/SB 330/SB 8. 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 1,545 dwelling units. This is a significant and unavoidable environmental impact and a finding of significance must be made in a revised EIR.

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." Appendix J states that the project will generate approximately 684 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/SB 8. A finding of significance must be made in a revised EIR.

[25] Housing Crisis Act of 2019/SB 330 https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201920200SB330
[26] SB 8 https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=202120220SB8
[27] San Bernardino County Map My County https://experience.arcgis.com/experience/8c4f806654654ba689fa7ab842d57352
[28] https://www.cityofrc.us/sites/default/files/2022-01/PlanRC_Volume%202_Final_pages.pdf

Response 4-15

This comment states that the Draft EIR does not conform with State housing laws as the EIR did not evaluate the development of residential uses on the project nor does it identify replacement residential sites. The characterization of the City's housing stock and potential residential buildout potential does not fall to a singular project but rather is assessed by the City during the Housing Element review cycle, which identifies the current need for housing in the city and identifies appropriate sites for this residential development to occur (City of Rancho Cucamonga 2021a). As shown in the City's 2021-2029 Housing Element, no parcels within the Southeast Industrial Area were identified as potential sites for the development of residential units to meet the City's current or future residential needs (City of Rancho Cucamonga 2022; Figure D-8, Sites Inventory by Planning Communities). This indicates that even though the project site zoning may allow for secondary residential uses, the City prefers to locate residential development elsewhere in the city away from industrial uses, which is consistent with smart growth planning principles.

As discussed in Section 3.10, "Land Use and Planning," the proposed project consists of infill industrial redevelopment in an already-established industrial area (i.e., Southeast Industrial Area), where the project site is surrounded by existing industrial uses. As stated in the City's General Plan, the Southeast Industrial Area is identified as an area with the potential to become a modern industrial employment district with convenient access to a wide range of services and amenities (City of Rancho Cucamonga 2021a). Furthermore, the project site is designated as Neo-Industrial and Industrial Employment, both of which permit a wide range of industrial uses with secondary residential use. As the proposed project is consistent with the industrial uses permitted by the existing land use and zoning, the industrial uses are allowed on the project site without consideration of the secondary residential use. As such, the Draft EIR is adequate in its analysis of the project's industrial uses and is not required to evaluate the environmental impacts of not developing other allowable uses on the project site.

Lastly, the development of residential uses in an already-established industrial area would be inconsistent with General Plan Policy RC-5.7, which states that sensitives uses (e.g., residential, hospitals, schools, and childcare facilities) should not be located within 1,000 feet of industrial land uses 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. Pursuing residential uses on the project site would create more environmental impacts than the proposed project due to the land use inconsistencies between industrial and residential uses and would not constitute smart development, which is encouraged under the General Plan. Thus, while the project site's zoning permits residential development, the proposed project is a better option to achieve the goal of focused industrial development in the Southeast Industrial Area as established by the General Plan. No changes to the Draft EIR are warranted in response to this comment.

Comment 4-16

The project site is primarily located in the Neo-Industrial Employment District of the General Plan, with only Building 5 (APN 022913119) within the Industrial Employment District. The EIR mischaracterizes the intent and permitted uses within the Neo-Industrial Employment District of the General Plan and the proposed project.

The General Plan states that in the Neo-Industrial land use designation, "More intensive industrial uses with substantive impacts on adjacent uses are not permitted;" and that, "Low impact industrial uses, such as incubator spaces and small warehouses, that are context-sensitive and calibrated to minimize impacts to adjacent residential uses are preferred." The Industrial Employment District of the General Plan permits uses that are, "a broad range of light and medium industrial uses, including light industrial research parks, logistics centers, low impact manufacturing, and machining operations."

The EIR states that, "The proposed industrial distribution facilities, including high-cube fulfillment center (non-sorting), general warehouse, high-cube cold storage warehouse, and accessory office space, are allowable uses within these land use designations." Distribution centers and warehouses are a component of the overall logistics center business chain. Logistics facilitates the overall movement of goods within supply chain management (upstream, downstream, raw materials, finished products, etc.). Distribution is a point on the logistics center business chain as the movement of finished gods for final delivery to the end consumer at their home or commercial stores. Overall, distribution centers are logistics centers and a component of the overall logistics process. Therefore, the proposed project is not permitted within the existing Neo-Industrial Employment District land use designation because it is not a small warehouse and it is not context sensitive or calibrated to minimize impacts. The project requests a Zoning Map Amendment to be located within the Large Warehouse Overlay, which clearly indicates that it is not a small warehouse. The project will result in significant and unavoidable impacts to Air Quality and increase VMT, indicating that it is an intense industrial use with substantive impacts on adjacent uses. The proposed distribution center use is clearly permitted and intended to be located within the Industrial Employment District as it expressly lists logistics centers as a permitted use. A finding of significance must be included as part of a revised EIR due to this inconsistency.

Response 4-16

The comment states that the Draft EIR incorrectly states that the proposed project is consistent with the Neo-Industrial and Industrial Employment District land uses and that the proposed project will intensify industrial uses on the project site as demonstrated by the requested zoning map amendment and significant air quality and VMT impacts. As discussed in Chapter 2, "Project Description," of the Draft EIR, the proposed project's large distribution/fulfillment center uses are permitted on parcels zoned as NI and IE with issuance of a CUP and a Master Plan for the site pursuant to Section 17.30.030, "Allowed Land Uses and Permit Requirements", of the RCMC. No changes to the Draft EIR are warranted based on this comment.

Comment 4-17

Table 3.10-1: Potential to Conflict with PlanRC 2040 Land Use Policies concludes that the project is consistent with 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," because, "The proposed project includes measures to reduce environmental impacts on human health and safety from air pollutants, hazardous materials, noise, and transportation hazards. Refer to Section 3.2, "Air Quality," Section 3.8, "Hazards and Hazardous Materials," Section 3.11, "Noise and Vibration," and Section 3.13, "Transportation" for additional discussion. Therefore, no conflict with Policy LC-1.16 would occur that would result in an adverse environmental effect." The analysis excludes that the project will result in significant and unavoidable cumulatively considerable impacts to Air Quality and VMT. The project conflicts with several items in the Healthy Development Checklist[29] for active transportation since it does not construct Whittram Avenue in accordance with the Southeast Area street network and therefore does not provide the associated active transportation infrastructure. The project also conflicts with, "17. Environmental Justice. How well does the project mitigate any impacts that would disproportionately affect disadvantaged communities?" The project will result in significant and unavoidable cumulatively considerable impacts to Air Quality and VMT within a SCAG Priority Equity Community and the site is adjacent to a SB 535 Disadvantaged Community, meaning that it does not successfully mitigate impacts that disproportionately affect disadvantaged communities.

[29] https://cheac.org/wp-content/uploads/2017/10/RUHS-HDC_FINAL09142017.pdf

Response 4-17

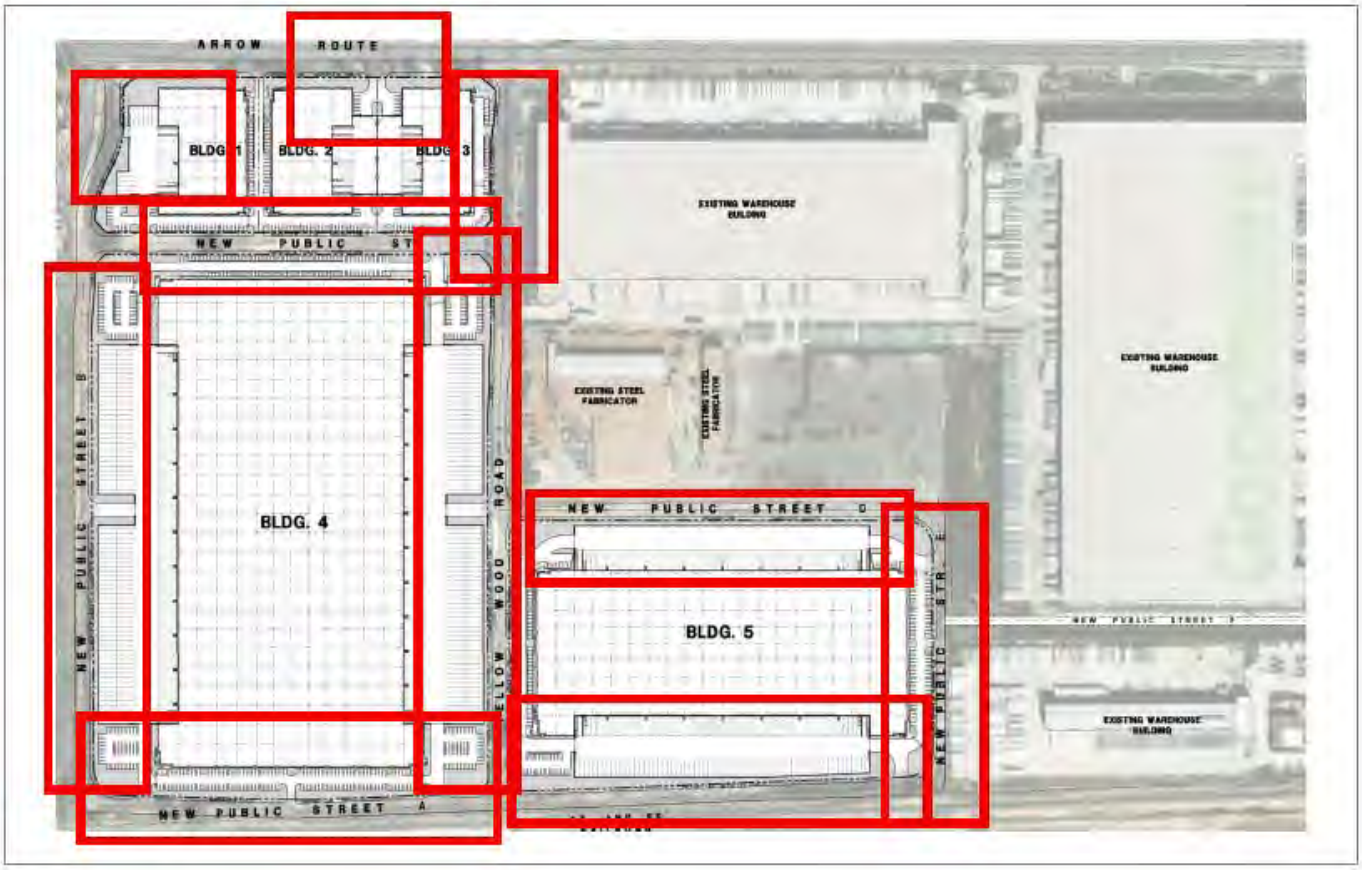
The comment states that the Draft EIR incorrectly concludes that land use impacts would be less than significant based on the project's consistency with Policy LC-1.16 of the City's General Plan as the proposed project would result in significant and unavoidable air quality and VMT impacts. In addition, the comment states that the Draft EIR does not assess the project's consistency with environmental justice and how the project would affect disadvantaged communities.

In accordance with Appendix G of the State CEQA Guidelines, the Draft EIR evaluates the proposed project's potential to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The purpose of this threshold is to evaluate whether a project would result in physical environmental impacts due to its inconsistency or incompatibility with a land use plan, policy, or regulation and does not immediately equate such inconsistency or incompatibility with resulting in a physical environmental impact.

As discussed in Section 3.10, "Land Use and Planning," of the Draft EIR, the proposed project is consistent with the intent of Policy LC-1.16, "Healthy Development," as the proposed project includes various design features and mitigation measures to reduce environmental impacts on human health and safety from air pollutants, hazardous materials, noise, and transportation hazards, which are included in the applicable individual EIR sections. Even though the proposed project would result in significant and unavoidable air quality and VMT impacts, the proposed project would still be consistent with this policy as all environmental effects to human health and safety have been reduced to the greatest extent feasible. Furthermore, the project's ability to satisfy the Healthy Development Checklist would not result in new physical environmental impacts beyond those disclosed in the Draft EIR and therefore, the Draft EIR is adequate in its determination. No changes to the Draft EIR are warranted in response to this comment.

Comment 4-18

The EIR concludes the project is consistent with Policy "LC-7.6 Loading Docks. *Require* that parking lots, loading docks, outdoor storage, and processing, *be located behind or beside buildings, not in front,* and be screened from public views," because, "loading docks would be oriented away from existing and proposed public streets or screened with walls, fences, and landscaping. The consistency analysis excludes any statements regarding the siting of loading docks and parking lots in front of the proposed buildings. Figure 2-11: Proposed Site Plan depicts several loading dock and parking lot areas that are in front of buildings and visible from public streets (Arrow Route, Yellow Wood Road, and New Public Streets A, B, C, D E, and F):



The EIR must be revised to include a finding of significance due to the project's inconsistency with Policy LC-7.6.

Response 4-18

The comment states that the Draft EIR incorrectly determined that the proposed project would be consistent with Policy LC-7.6, which states that parking lots, loading docks, outdoor storage, and processing, be located behind or beside buildings, not in front, and that the proposed project would not comply with this policy. As stated in Response to Comment 4-17, the purpose of the land use consistency analysis is to determine if a conflict with a land use plan, policy, or regulation adopted would result in a physical environmental impact. As discussed in Section 3.10, "Land Use and Planning," of the Draft EIR, the proposed building, parking lot, driveways, and sidewalks would be arranged to emphasize the aesthetically pleasing components of the site (e.g., landscaping and offices) and to screen less attractive elements (e.g., service facilities, loading docks, outdoor storage, equipment areas, and refuse enclosures) through the placement and design of the buildings, screen walls, and landscaping. While the proposed project would develop six new public roadways through the project site, these are intended to increase connectivity between industrial uses in the Southeast Industrial Area and would not be used by the public on a regular basis. Therefore, the Draft EIR was adequate in its determination that the proposed project is consistent with Policy LC-7.6. No changes to the Draft EIR are warranted in response to this comment.

Comment 4-19

Further, Table 3.10-1: Potential to Conflict with PlanRC 2040 Land Use Policies does not provide a consistency analysis with the following applicable General Plan policies and must be revised to include this analysis:

1. 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.
2. Policy LC-1.6 Disadvantaged Communities. Prioritize development appropriate to the needs of disadvantaged communities, particularly south of Foothill Boulevard.

3. 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.
4. Policy LC-1-8 Public Art. Require new construction to integrate public art in accordance with the City Public Arts Program.
5. 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.
6. 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.
7. 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.
8. 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.
9. Goal LC-3 Fiscally Sustainable. A fiscally sound and sustainable City.
10. 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.
11. 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.
12. 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.
13. 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.
14. 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 perimeter, and ample opportunities for paths and trails connecting to the City system, as well as relaxation areas for employees.
15. 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.
16. 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.
17. Goal H-1 Housing Opportunities. A diverse community with a broad range of housing types and opportunities to accommodate expected new households.
18. 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.
19. Goal RC-5 Local Air Quality. Healthy air quality for all residents.
20. 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.
21. 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.

22. 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.
23. 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.
24. 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.
25. 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.
26. 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.
27. 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.
28. Policy RC-6.5 GHG Reduction Goal. Reduce emissions to 80 percent below 1990 levels by 2050 and achieve carbon neutrality by 2045.
29. 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.
30. 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.
31. 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.
32. 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.
33. 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.
34. 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.
35. 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.
36. Goal S-5 Emerging Hazards. A built environment that incorporates new data and understanding about changing hazard conditions and climate stressors.
37. 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.

38. 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.
39. Policy S-5.6 Underground Utilities. Promote the under-grounding of utilities for new development, major remodels, and redevelopment.
40. Policy S-5.8 Climate Resiliency. Address climate resiliency and inequities through the planning and development process.
41. 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.
42. 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.
43. 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.

Response 4-19

The comment states that the Draft EIR did not evaluate the proposed project's consistency with the 43 General Plan policies listed in the comment. It should be noted that while the commenter underlined specific policies as shown above, it is unclear the intention of the underlining as their comment references all 43 General Plan policies listed. Section 15151 of the State CEQA Guidelines states that "an EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible." Pursuant to Section 15151 of the State CEQA Guidelines, Section 3.10, "Land Use and Planning," of the Draft EIR did evaluate the proposed project's consistency with the relevant General Plan policies related to planning and land use that are applicable to the project and project site. General Plan policies specific to other environmental issue areas are discussed, as appropriate, in their respective sections of the Draft EIR. This approach is consistent with the precedent established by CEQA case law (Sequoyah Hills Homeowners Association v. City of Oakland (1993) Cal.App.1st.2). For this reason, the land use and planning consistency analysis in the Draft EIR is adequate. No changes to the Draft EIR are warranted in response to this comment.

Comment 4-20

Further, the EIR is internally inconsistent as it concludes in the Transportation section that the project is not consistent with the buildout of PlanRC (General Plan) nor the SCAG RTP/SCS land use scenario and it does not discuss this information here. The EIR must be revised to include this information here in order to provide an adequate and accurate environmental document and include a finding of significance due to this direct inconsistency.

Response 4-20

The comment states that the Draft EIR is internally inconsistent as the Transportation section states the proposed project is not consistent with the buildout of the General Plan nor the SCAG RTP/SCS. As discussed in Appendix I, "CEQA Transportation Impact Study," of the Draft EIR, the methodology used to evaluate VMT was based on a comparison of the projected employment growth under the proposed project against that of SCAG's RTP/SCS, which is based on the General Plan, at the transit analysis zone (TAZ) level. As discussed in Response to Comment 4-5 above, while the proposed project would be within the employment growth projections for the Remainder of the City, when considered with other industrial projects, the proposed project may increase employment growth beyond the General Plan projections for this area. However, the employment growth under the proposed project, even when considered with other industrial and non-industrial projects approved since the adoption of the General Plan, would still be within the total employment growth projected by the General Plan. Because the methodology for the evaluation of VMT is based on the TAZ-level and not the total employment growth projections of the General Plan,

the project would be inconsistent with SCAG's RTP/SCS and General Plan employment growth projections as it pertains to the transportation analysis. Therefore, while the transportation analysis in the Draft EIR is adequate, Section 3.13, "Transportation," of the Draft EIR has been revised in Chapter 3, "Revisions to the Draft EIR" of this Final EIR to clarify the distinction in the methodology for the VMT analysis.

Comment 4-21

Table 3.10-2 Potential to Conflict with Connect SoCal 2024 Policies does not specifically list any of the Connect SoCal 2024 Policies. The EIR groups together a few sequential policies and provides a general summary of the items. Given the EIR's conclusion that the project will result in significant and unavoidable impacts to Air Quality and increase VMT, and the project site is within a SCAG Priority Equity Community[30] (SCAG Census Tract 06071002207), the project is directly inconsistent with the following policies and will impede the SCAG region's ability to achieve statewide GHG reduction and climate goals:

1. Equitable Engagement and Decision-Making Policy 45. Advance community-centered interventions, resources and programming that serve the most disadvantaged communities and people in the region, like Priority Equity Communities, with strategies that can be implemented in the short-to-long-term.
2. Equitable Engagement and Decision-Making Policy 46. Promote racial equity that is grounded in the recognition of the past and current harms of systemic racism and one that advances restorative justice.
3. Equitable Engagement and Decision-Making Policy 47. Increase equitable, inclusive, and meaningful representation and participation of people of color and disadvantaged communities in planning processes.
4. Sustainable Development Policy 48. Promote sustainable development and best practices that enhance resource conservation, reduce resource consumption and promote resilience.
5. Sustainable Development Policy 49. Support communities across the region to advance innovative sustainable development practices.
6. Sustainable Development Policy 50. Recognize and support the diversity of communities across the region by promoting local place-making, planning and development efforts that advance equity, mobility, resilience and sustainability.
7. Air Quality Policy 51. Reduce hazardous air pollutants and greenhouse gas emissions and improve air quality throughout the region through planning and implementation efforts.
8. Air Quality Policy 52. Support investments that reduce hazardous air pollutants and greenhouse gas emissions.
9. Air Quality Policy 53. Reduce the exposure and impacts of emissions and pollutants and promote local and regional efforts that improve air quality for vulnerable populations, including but not limited to Priority Equity Communities and the AB 617 Communities.
10. Climate Resilience Policy 64. Prioritize the most vulnerable populations and communities subject to climate hazards to help the people, places and infrastructure that are most at risk for climate change impacts. In doing so, recognize that disadvantaged communities are often overburdened.
11. Climate Resilience Policy 65. Support local and regional climate and hazard planning and implementation efforts for transportation, land use, and other factors.
12. Climate Resilience Policy 66. Support nature-based solutions to increase regional resilience of the natural and built environment.

A revised EIR must be prepared to disclose the project's inconsistency with these policies and include a finding of significance. This is especially notable as the project site (SCAG Census Tract 06071002207) is identified as a Priority Equity Community in the RTP/SCS[31] and the project will result in significant and unavoidable impacts to Air Quality and increase VMT. Additionally, the EIR concludes that the project is inconsistent with the RTP/SCS growth projections and buildout scenario. The EIR must be revised to include a finding of significance.

[30] https://hub.scag.ca.gov/datasets/daa7cbaf5b064399800f3426cbb64270_0/explore?location=33.814985%2C-117.221261%2C14.86
[31] https://hub.scag.ca.gov/datasets/daa7cbaf5b064399800f3426cbb64270_0/explore?location=33.814985%2C-117.221261%2C14.86

Response 4-21

The comment states that the Draft EIR did not evaluate the proposed project's consistency with the 12 additional Connect SoCal 2024 policies listed in the comment. As stated in Response to Comment 19, Section 15151 of the State CEQA Guidelines do not require an exhaustive analysis but rather good-faith effort to disclose the environmental effects of a project. Pursuant to Section 15151 of the State CEQA Guidelines, Section 3.10, "Land Use and Planning," of the Draft EIR did evaluate the proposed project's consistency with the relevant Connect SoCal 2024 policies related to planning and land use that are applicable to the project and project site. Connect SoCal 2024 policies specific to other environmental issue areas are discussed, as appropriate, in their respective sections of the Draft EIR. For this reason, the land use and planning consistency analysis in the Draft EIR is adequate. No changes to the Draft EIR are warranted in response to this comment.

Comment 4-22

The EIR has not discussed or analyzed the project in accordance with all Rancho Cucamonga Municipal Code requirements. Rancho Cucamonga Municipal Code Section 17.22.040(C) provides the required findings for approval of a Zoning Map Amendment:

"17.22.040(C): Findings. Development code/zoning map amendments may be approved only when the city council finds that the Development Code/zoning map amendment is consistent with the general plan goals, policies, and implementation programs."

The project will result in significant and unavoidable impacts to Air Quality and increase VMT. As discussed throughout this comment letter, the project is directly inconsistent with several General Plan goals and policies. A finding of significance must be provided in a revised EIR.

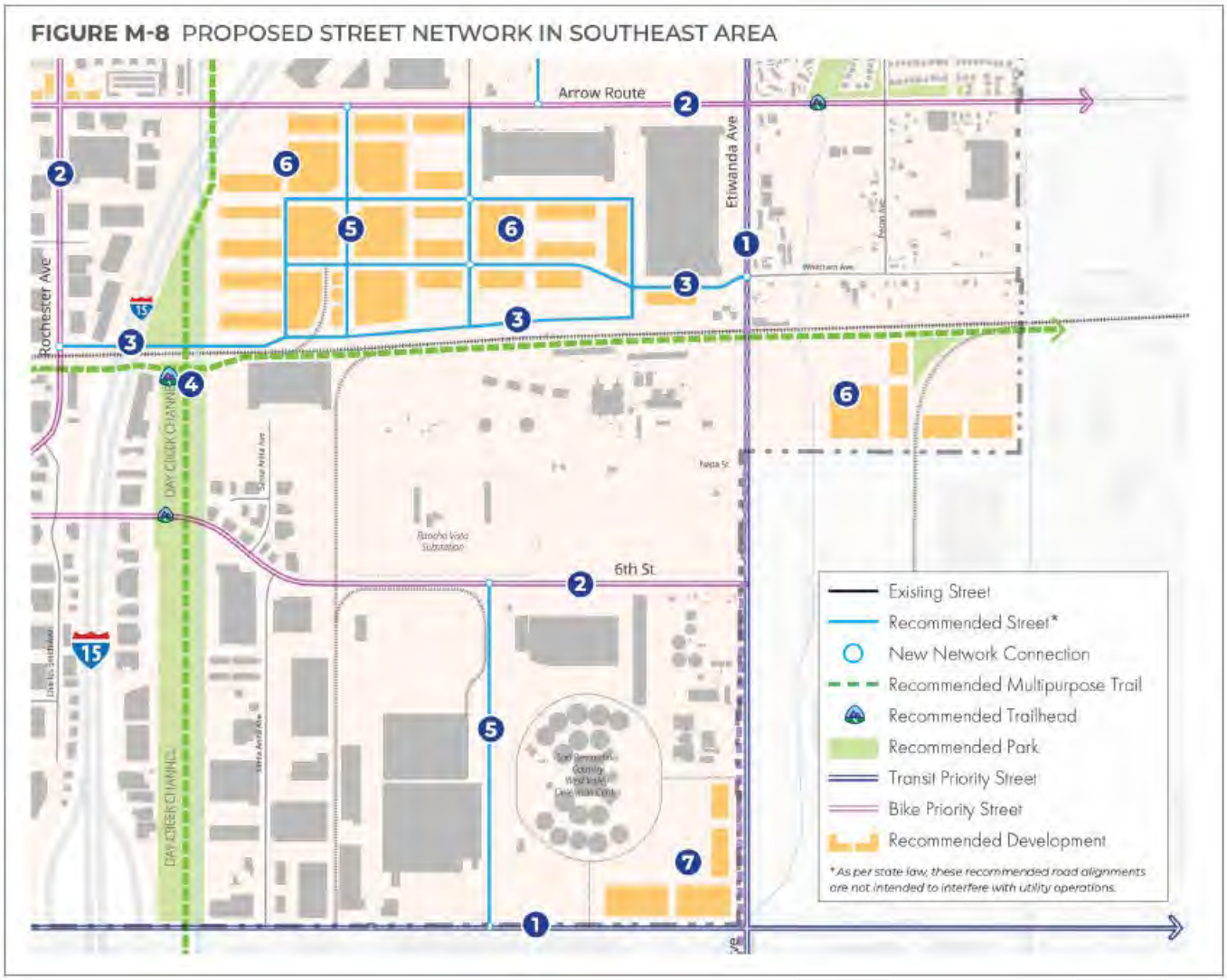
Response 4-22

The comment states that the Draft EIR did not analyze or discuss the proposed project's consistency with the RCMC, including Section 12.22.040(C). As stated in Response to Comment 19, Section 15151 of the State CEQA Guidelines do not require an exhaustive analysis but rather good-faith effort to disclose the environmental effects of a project. Pursuant to Section 15151 of the State CEQA Guidelines, Section 3.10, "Land Use and Planning," of the Draft EIR did evaluate the proposed project's consistency with the RCMC as it relates to planning and land use requirements that are applicable to the project and project site. RCMC requirements and regulations specific to other environmental issue areas are discussed, as appropriate, in their respective sections of the Draft EIR. For this reason, the land use and planning consistency analysis in the Draft EIR is adequate. No changes to the Draft EIR are warranted in response to this comment.

Comment 4-23

3.13 Transportation

The EIR has not adequately or accurately analyzed the project in accordance with all programs, plans, ordinances, or policies addressing the Circulation System, including transit, roadway, bicycle, and pedestrian facilities. Figure M-8: Proposed Street Network in Southeast Area lists the following requirements for the project site:



"Requirement 3: Extend Whittram Avenue from Etiwanda Avenue to Rochester Avenue and under the I-15 to provide better access to the Southeast Area.

Requirement 5: Develop a more complete, modern, multi-modal street network for improved circulation and access. The street network in this area is at or near capacity. If the legacy heavy industrial uses redevelop, additional east-west street capacity between Rochester Avenue and Etiwanda Avenue and north-south street capacity between Arrow and 6th Street will be needed."

The required street network bisects the Building 4 site. The EIR states that, "…the construction of new public street F would *partially* achieve a roadway connection envisioned in PlanRC, which *considered* the extension of Whittram Avenue from Etiwanda Avenue to Rochester Avenue and under the I-15 to provide better access to the Southeast Industrial Area (City of Rancho Cucamonga 2021a: Figure M-8). Therefore, the proposed project would not conflict with any planned or programmed roadway improvements in the vicinity of the project site." The requirement is clear - construct Whittram Avenue in accordance with Requirement 3 to complete street network in the Southeast Area. The project does not comply with Requirement 3 and therefore a finding of significance must be included in a revised EIR.

Response 4-23

The comment states that the Draft EIR did not analyze the project in accordance with all programs, plans, ordinances, or policies addressing the Circulation System, including transit, roadway, bicycle, and pedestrian facilities, and states that the Draft EIR did not include Requirements 3 and 5 of the General Plan in the transportation analysis. In addition, the comment states that the project fails to fully achieve the extension of Whittram Avenue as identified in the General Plan. As discussed in Section 3.13, "Transportation," the Draft EIR includes an analysis of the proposed project's consistency with all applicable transportation plans, policies, and programs. The circulation requirements listed in the comment are mobility requirements that the City established for itself to accomplish through the buildout of the General Plan and the responsibility of these improvements do not fall onto any specific development project. Rather, as stated in Response to Comment 2-2, the project applicant will contribute its fair share contribution to the City's transportation DIF program to help fund the City's transportation improvements in addition to partially constructing the Whittram Avenue extension through the project site. Therefore, the transportation analysis in the Draft EIR is adequate. No changes to the Draft EIR are warranted in response to this comment.

Comment 4-24

The EIR also does not discuss or analyze several other requirements from the Circulation Element of the General Plan. For example, Figure FA-1: Focus Areas Map depicts Arrow Route as a Transit Priority Street. Figure FA-2:Focus Area 1: Downtown Rancho Cucamonga depicts Arrow Route east of Rochester Avenue as a Bike Priority Street and includes, "Requirement 2: Improve Church Street, Arrow Route and Rochester Avenue with buffered bike lanes." Figure M-6: Pedestrian Focus Areas depicts the entirety of the project site within a pedestrian focus area. The complete streets network in the Southeast Area will not be constructed in accordance with the Circulation Element as the project will not construct Whittram Avenue and therefore not provide the associated active transportation improvements. A finding of significance must be included in a revised EIR.

Response 4-24

The comment states that the Draft EIR did not evaluate several other requirements of the Circulation Element of the General Plan and that a finding of significance must be included in a revised EIR. Refer to Response to Comment 4-23. No changes to the Draft EIR are warranted in response to this comment.

Comment 4-25

Table 3.13-7: Project-Generated VMT shows that the project will exceed the VMT threshold for both the 2019 Baseline Year Plus Project and the 2050 Future Year Plus Project scenarios. The EIR provides Mitigation Measures 3.13-2a, 3.13-2b, 3.13-2c, and 3.13-2d to justify mitigating impacts to less than significant levels:

"Mitigation Measure 3.13-2a: Implement Commute Trip Reduction Marketing: The implementation of commute trip reduction marketing would result in an estimated up to 4-percent employee VMT reduction (CAPCOA 2021). Information sharing and marketing promote and educate employees about their travel choices to the employment location beyond driving such as carpooling, taking transit, walking, and biking, thereby reducing VMT.

Mitigation Measure 3.13-2b: Provide Employee Rideshare Program: The implementation of a ridesharing program would result in an estimated up to 4-percent employee VMT reduction (CAPCOA 2021). Ridesharing encourages carpooled vehicle trips in place of single-occupied vehicle trips, thereby reducing the number of trips and, therefore, VMT.

Mitigation Measure 3.13-2c: Provide End-of-Trip Bicycle Facilities: Providing end-of-trip facilities would result in an estimated up to 0.3-percent employee VMT reduction (CAPCOA 2021). The provision and maintenance of secure bike parking and related facilities encourages commuting by bicycle, thereby reducing VMT.

Mitigation Measure 3.13-2d: Provide Employer-Sponsored Vanpool: Providing employer-sponsored vanpool would result in an estimated up to 1.6-percent employee VMT reduction (CAPCOA 2021). Vanpooling is a flexible form of public transportation that provides groups of 5 to 15 people with a cost-effective and convenient rideshare option for commuting. The mode shift from long distance, single-occupied vehicles to shared vehicles reduces overall commute VMT. The analysis assumes that up to 2 percent of employees would participate in the vanpool program."

Notably, the EIR has not provided substantial evidence to support the conclusion that Mitigation Measures 3.13-2a through 2d will reduce VMT to below the significance threshold throughout the life of the project. Mitigation Measures 3.13-2a through 2d are unenforceable mitigation in violation of CEQA § 21081.6 (b). Appendix I employs the assumption that 100% of the future employees are eligible to participate, which cannot be feasibly ascertained as the EIR simultaneously asserts throughout the document that the future tenants are unknown.

Further, it is not possible for the lead agency to ensure that Mitigation Measures 3.13-2a through 2d will result in reduced VMT by project employees and be implemented continuously, at all times, throughout the life of the project and maintain a VMT reduction to less than significant levels at all times. 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 therefore remains 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 or non-single occupant vehicle travel associated with the mitigation measures and mitigation of the project's VMT impact to less than significant is not feasible.

Response 4-25

The comment states that the Draft EIR does not provide substantial evidence to support the conclusion that Mitigation Measures 3.13-2a through 2d will reduce VMT to below the significance threshold throughout the life of the project. Mitigation Measures 3.13-2a through 3.13-2d do not require the project applicant to ensure a change in human behavior but rather implement the specific VMT reduction programs the measures call for. The basis for the reductions in VMT is the research cited by the CAPCOA handbook and other research that has been conducted that has shown these types of programs do help to reduce VMT (TRB 2010; CARB 2014) and as such, specific credits have been built into the VMT model to account for these reductions when applied as mitigation. By agreeing to the measures, the applicant is then able to take credit for the VMT reduction in the model, which allows for the impact to be reduced. Furthermore, the transportation analysis in the Draft EIR concludes that even with implementation of Mitigation Measures 3.13-2a through 3.13-2d, VMT impacts would remain significant and unavoidable with implementation of the proposed project. Therefore, the transportation analysis within the Draft EIR is adequate and no changes to the Draft EIR are warranted in response to this comment.

Comment 4-26

Additionally, Table 1: VMT Impact Thresholds of Exhibit A to Resolution No. 2020-056[32] states that for Land Use Projects, "A significant impact would occur if the project is determined to be inconsistent with the RTP/SCS." Appendix I states that, "The Project was determined to be inconsistent with the land use growth assumptions in Plan RC and in the RTP/SCS by reviewing the regional travel model, SBTAM+. As shown in Table 3 and Figures 2 and 3, the manufacturing and transportation employment growth generated by the Project is more than the total growth assumed in SBTAM+." Therefore, the project results in a significant impact due to inconsistency with the RTP/SCS, and a finding of significance for this specific reason must be included in a revised EIR.

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 due to traveling from large import hubs to distribution centers or smaller industrial parks and then to their final delivery destinations. Once employees arrive at work at the proposed project, they will conduct their jobs by driving delivery vans across the region as part of the daily operations as distribution warehouses, 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 actual VMT generated by all aspects of project operation is not consistent 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.

[32] https://rcdocs.cityofrc.us/WebLink/PDF10/fbcc90aa-27bf-455c-9838-e4a085ad0278/570716

Response 4-26

The comment states that the Draft EIR is internally inconsistent as the Transportation section states the proposed project is not consistent with the buildout of the General Plan nor the SCAG RTP/SCS. Refer to Response to Comment 4-20 regarding employment growth under the proposed project compared to SCAG's RTP/SCS. As discussed in Appendix I, The VMT analysis is based on the "CEQA Transportation Impact Study," of the Draft EIR, the methodology used to evaluate VMT is based on the City's transportation impact analysis guidelines, discussion with City transportation staff, and the San Bernardino Transportation Analysis Model (SBTAM+). Therefore, the Draft EIR did not underreport the VMT generated by the project and the transportation analysis in the Draft EIR is adequate. No changes to the Draft EIR are warranted in response to this comment.

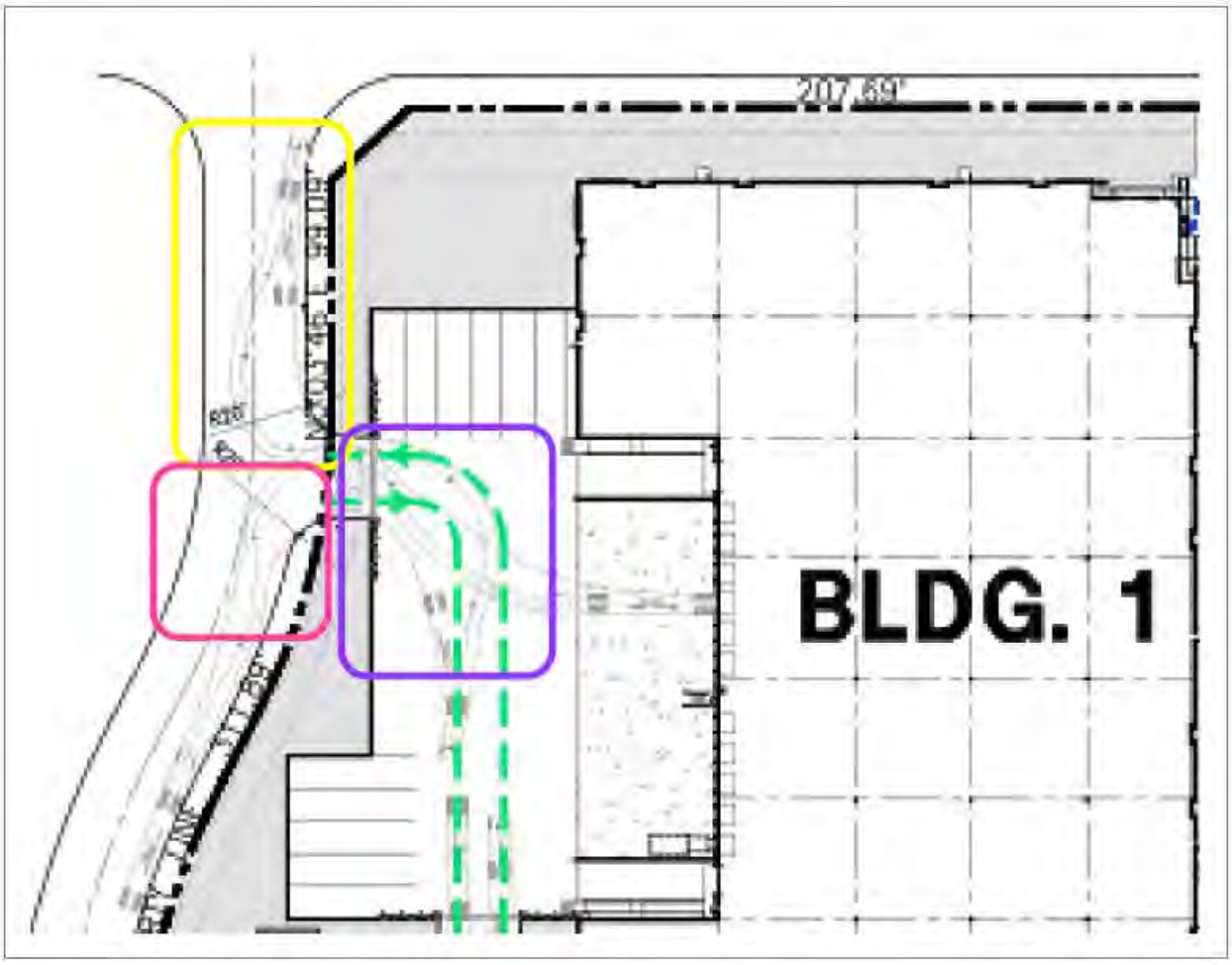
Comment 4-27

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. The EIR states that, "All roadway and facility improvements would be subject to and constructed in accordance with applicable City and industry standard roadway design and safety guidelines, including the City of Rancho Cucamonga Standard Drawings and design guidelines provided in Chapter 17.120 and Section 17.122.030 of the Municipal Code. Furthermore, the proposed project would be subject to City review processes, which would ensure that the proposed project design, including new roadway improvements and tie-ins to the existing transportation network, would comply with all applicable design standards related to transportation safety." 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. 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.

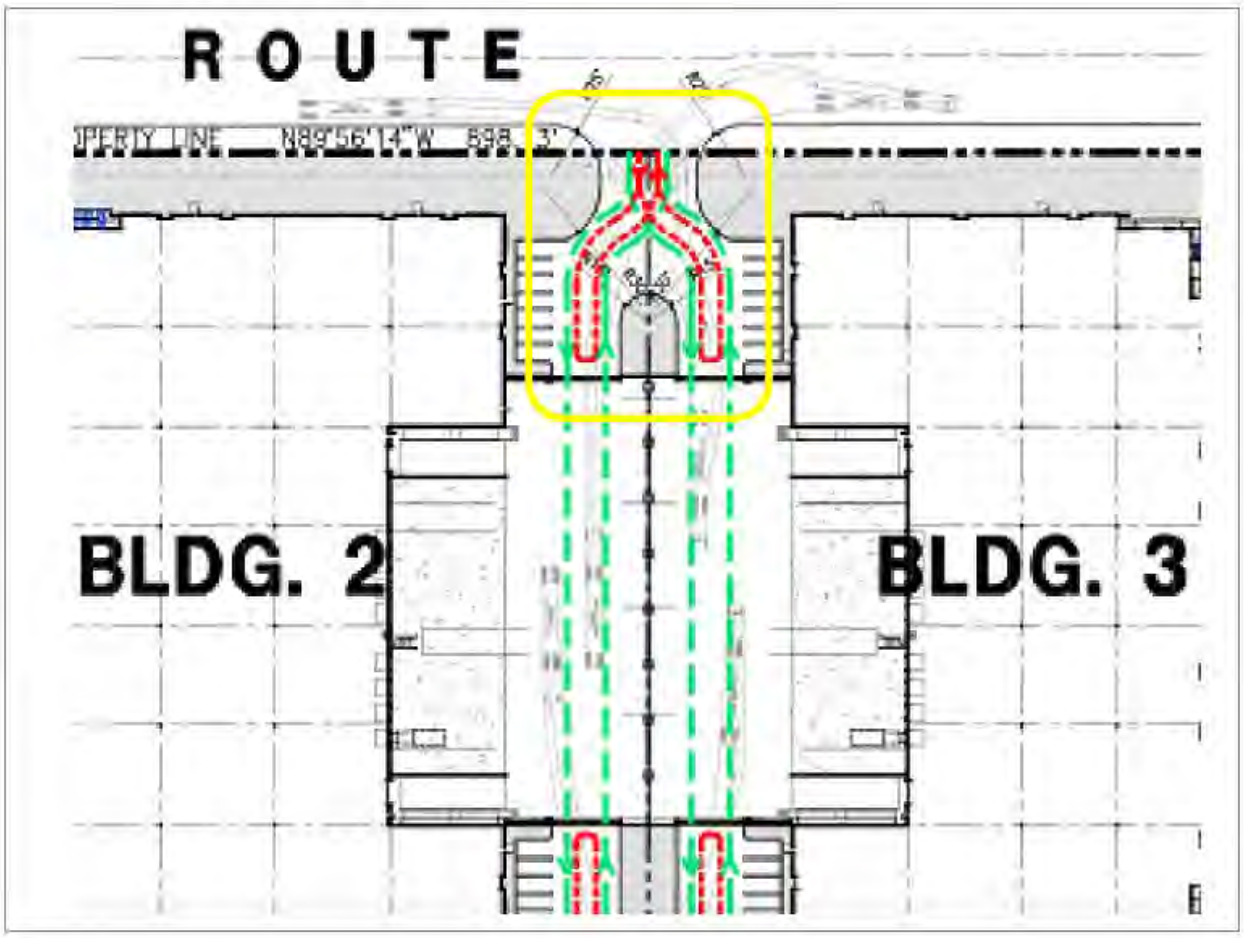
The EIR does not discuss Figure 2-17: Proposed Onsite Circulation, which depicts several areas of conflict between vehicles, as shown below.

West side of Building 1 at New Public Street B: Trucks/trailers entering and exiting the sites require additional maneuvering space across the centerline of each street, meaning that the trucks will need to drive on the "wrong side" of the street into oncoming traffic in order to enter or exit the site. A finding of significance is required in a revised EIR.

Additionally, the overlapping lines along the internal driveway indicate that it is not wide enough to accommodate more than one truck/trailer movement at a time. Truck/trailer parking stalls are also configured within the truck/trailer loading dock courts and adjacent to the project driveway. This layout and design is not conducive to vehicular maneuvering. These parking stalls may be in use at any time and further restrict truck/trailer movement, particularly while trucks/trailers attempt to utilize the loading docks and maneuver throughout the site. Queuing/storage space is required on New Public Street B and the EIR has not analyzed these significant impacts. A finding of significance is required in a revised EIR.

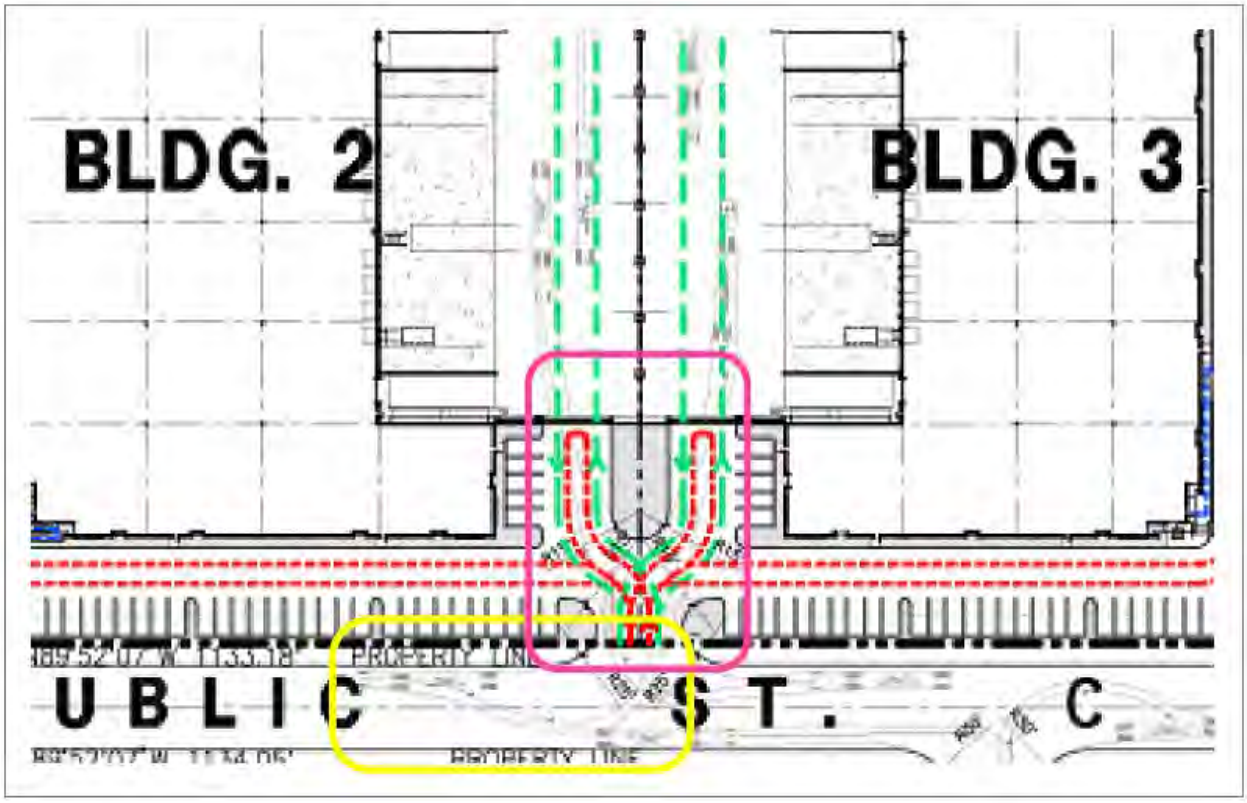


North side of Building 2 and Building 3 at Arrow Route: The overlapping lines along the internal driveway indicate that it is not wide enough to accommodate more than one truck/trailer movement at a time. Additionally, passenger car parking stalls are configured adjacent to the truck/trailer loading dock courts and the project driveway. This layout and design is not conducive to vehicular maneuvering. These parking stalls may be in use at any time and further restrict truck/trailer movement, particularly while trucks/trailers attempt to maneuver throughout the site. Queuing/storage space is required on Arrow Route and the EIR has not analyzed these significant impacts. A finding of significance is required in a revised EIR.



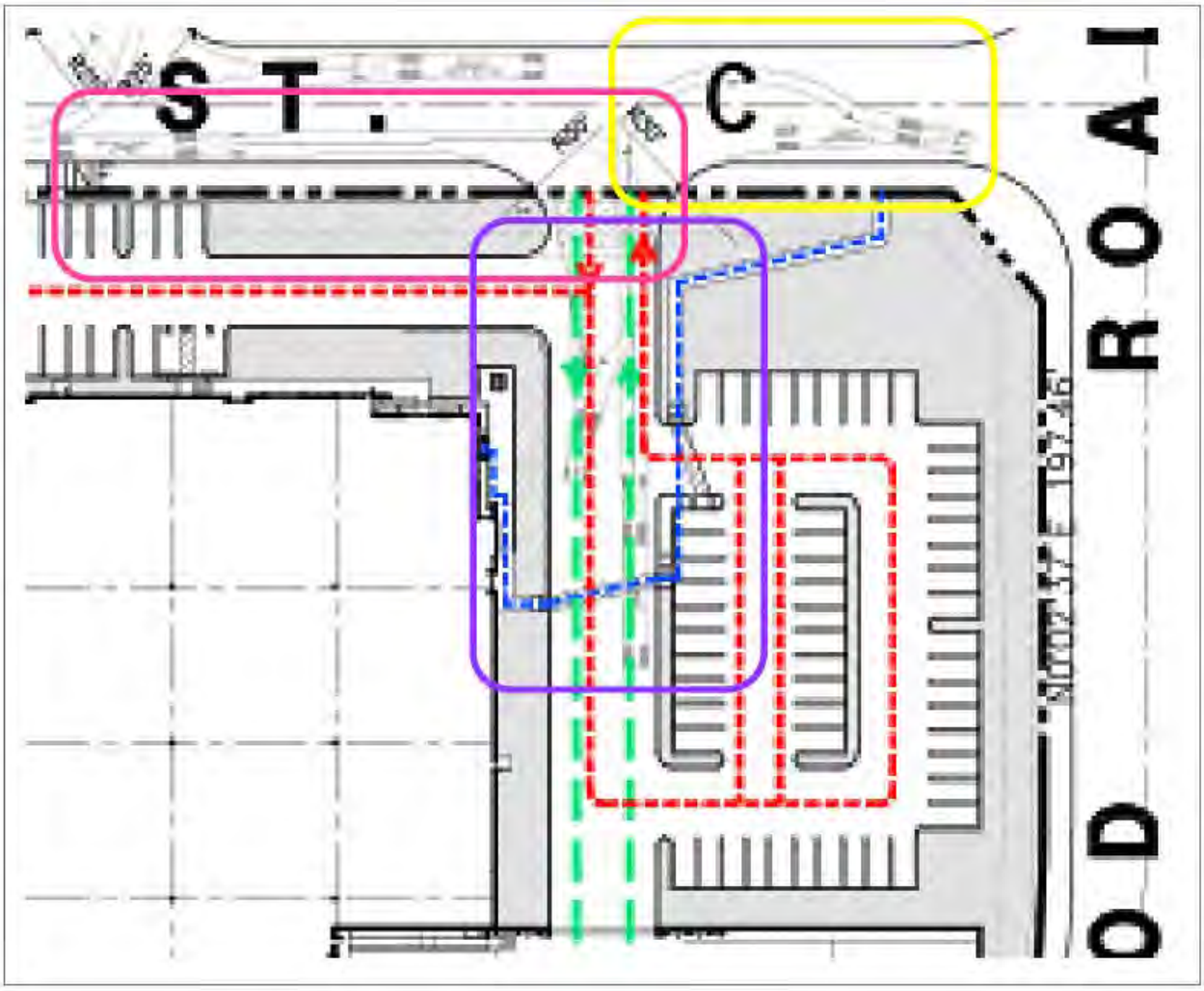
South side of Building 2 and Building 3 at New Public Street C: Trucks/trailers entering and exiting the sites require additional maneuvering space across the centerline of each street, meaning that the trucks will need to drive on the "wrong side" of the street into oncoming traffic in order to enter or exit the site. A finding of significance is required in a revised EIR.

Additionally, the overlapping lines along the internal driveway indicate that it is not wide enough to accommodate more than one truck/trailer movement at a time. Passenger car parking stalls are also configured adjacent to the truck/trailer loading dock courts and the project driveway. This layout and design is not conducive to vehicular maneuvering. These parking stalls may be in use at any time and further restrict truck/trailer movement, particularly while trucks/trailers attempt to maneuver throughout the site. Queuing/storage space is required on New Public Street C and the EIR has not analyzed these significant impacts. A finding of significance is required in a revised EIR.



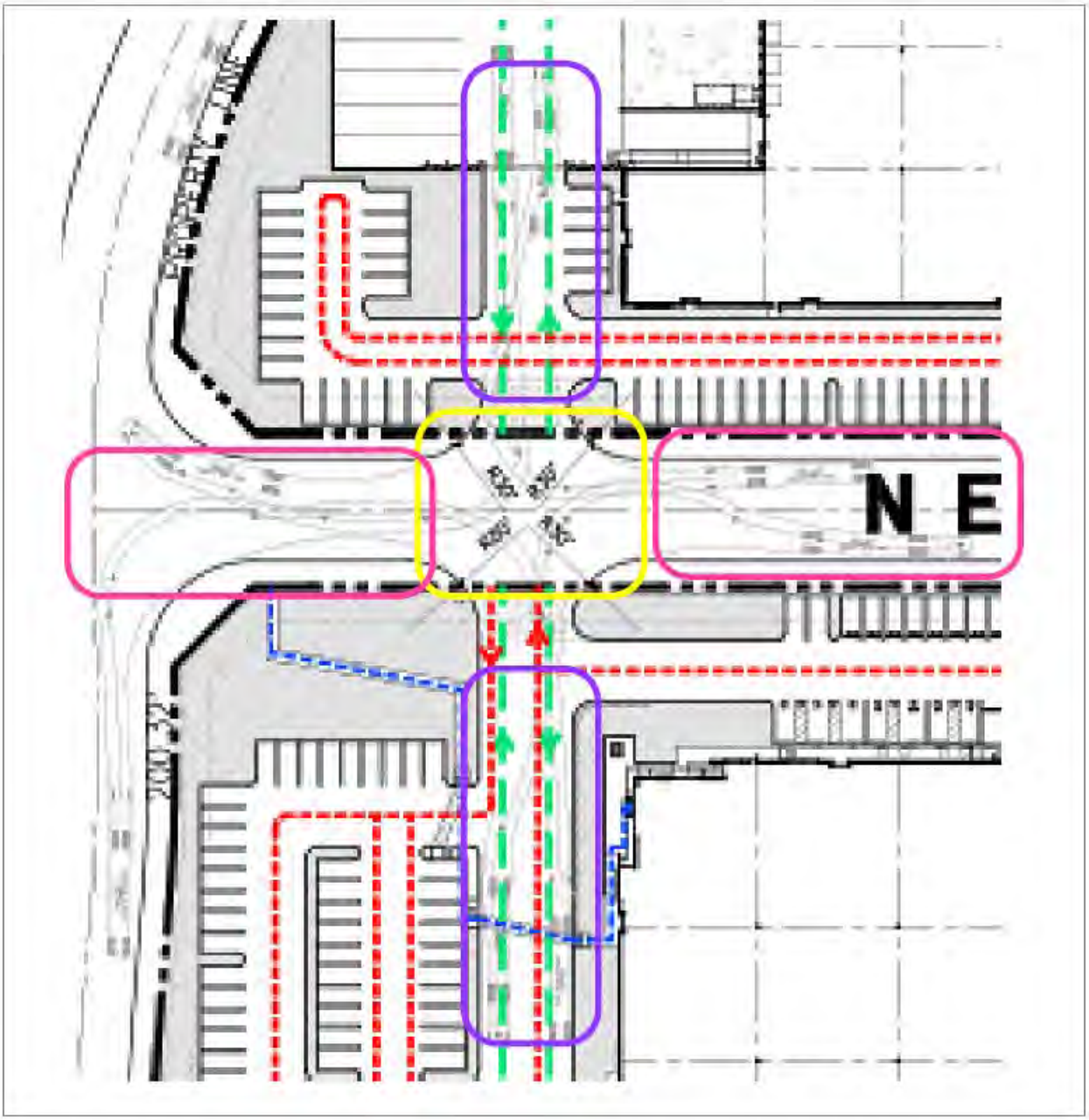
Northeast side of Building 4 at New Public Street C and Yellow Wood Road: Trucks/trailers entering and exiting the sites require additional maneuvering space across the centerline of each street, meaning that the trucks will need to drive on the "wrong side" of the street into oncoming traffic in order to enter or exit the site. A finding of significance is required in a revised EIR.

Additionally, the overlapping lines along the internal driveway indicate that it is not wide enough to accommodate more than one truck/trailer movement at a time. Queuing/storage space is required on New Public Street C and the EIR has not analyzed these significant impacts. A finding of significance is required in a revised EIR.



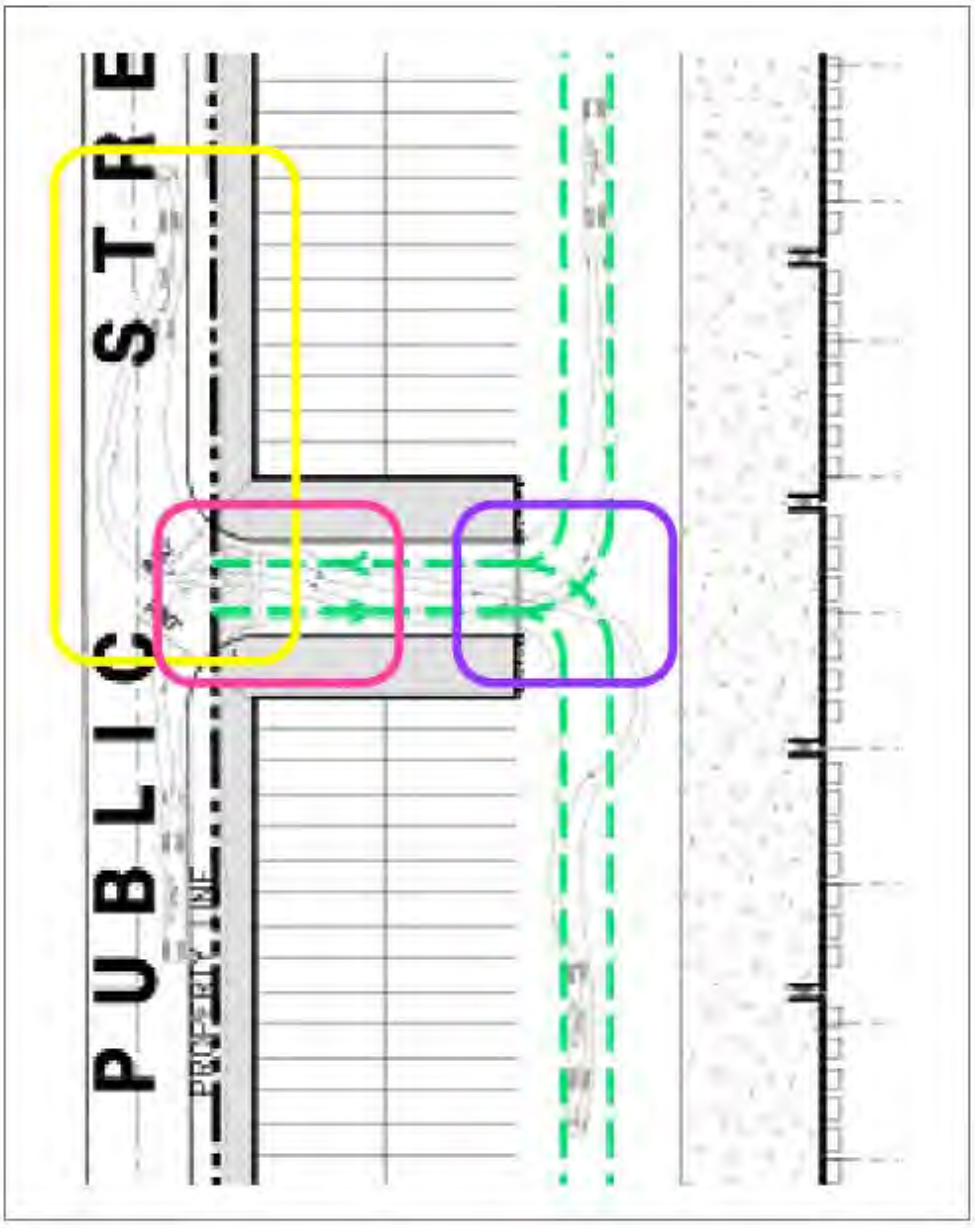
Driveways at Northwest side of Building 4/Southwest side of Building 1 at New Public Street B and New Public Street C: Trucks/trailers entering and exiting the sites require additional maneuvering space across the centerline of each street, meaning that the trucks will need to drive on the "wrong side" of the street into oncoming traffic in order to enter or exit the site. A finding of significance is required in a revised EIR.

Additionally, the overlapping lines along the internal driveway indicate that it is not wide enough to accommodate more than one truck/trailer movement at a time. Passenger car parking stalls are also configured adjacent to the truck/trailer loading dock courts and the project driveway. This layout and design is not conducive to vehicular maneuvering. These parking stalls may be in use at any time and further restrict truck/trailer movement, particularly while trucks/trailers attempt to maneuver throughout the site. Queuing/storage space is required on New Public Street B and New Public Street C and the EIR has not analyzed these significant impacts. A finding of significance is required in a revised EIR.



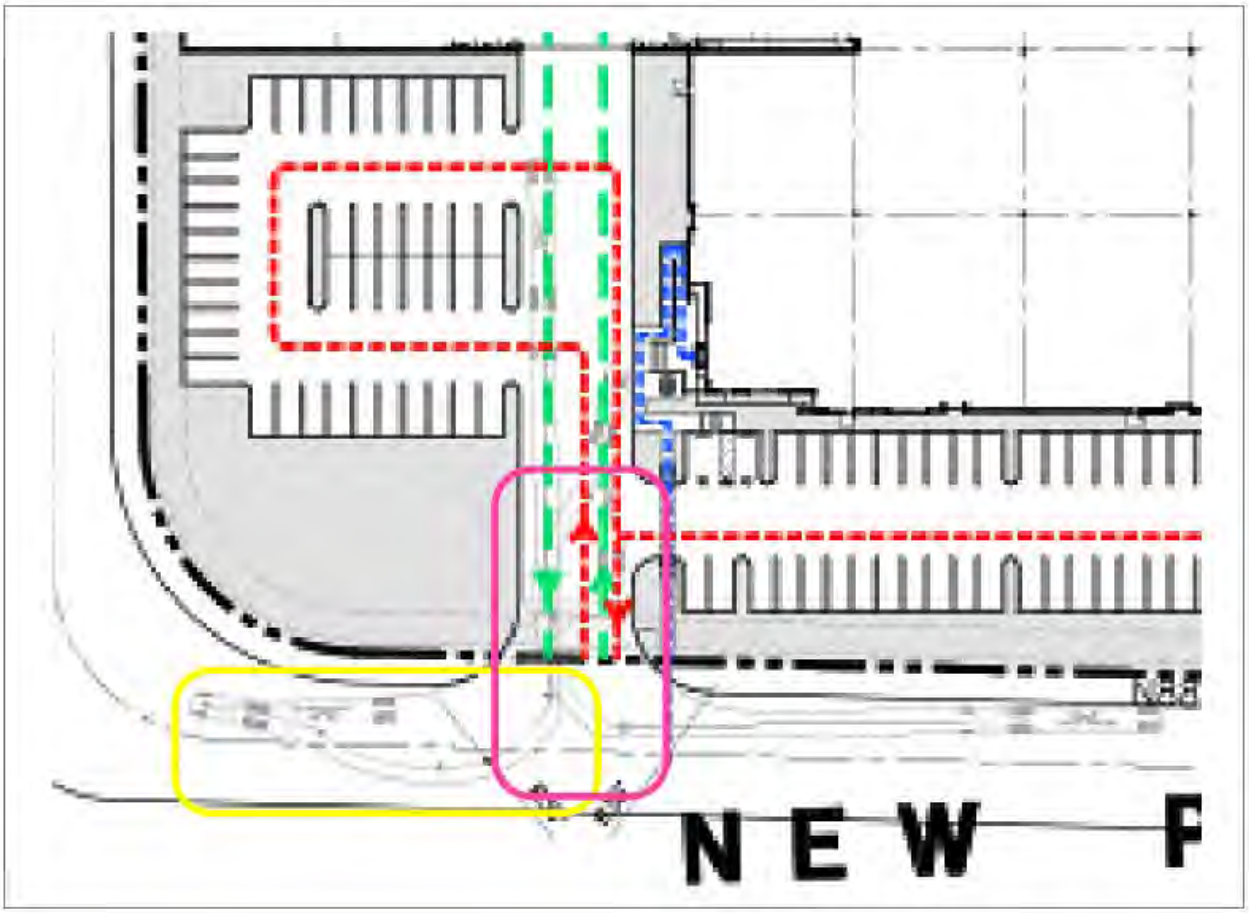
West side of Building 4 Mid-Block driveway at New Public Street B: Trucks/trailers entering and exiting the site require additional maneuvering space across the centerline of each street, meaning that the trucks will need to drive on the "wrong side" of the street into oncoming traffic in order to enter or exit the site. A finding of significance is required in a revised EIR.

Additionally, the overlapping lines along the internal driveway indicate that it is not wide enough to accommodate more than one truck/trailer movement at a time. Truck/trailer parking stalls are within the truck/trailer loading dock courts in a tandem configuration. This layout and design is not conducive to vehicular maneuvering. These parking stalls that may be in use at any time and further restrict truck/trailer movement, including increasing truck idling as tandem parked trucks require additional time to maneuver, which will also result in increased queuing duration and associated queuing area for trucks/trailer. Queuing/storage space is required on New Public Street B and the EIR has not analyzed these significant impacts. A finding of significance is required in a revised EIR.



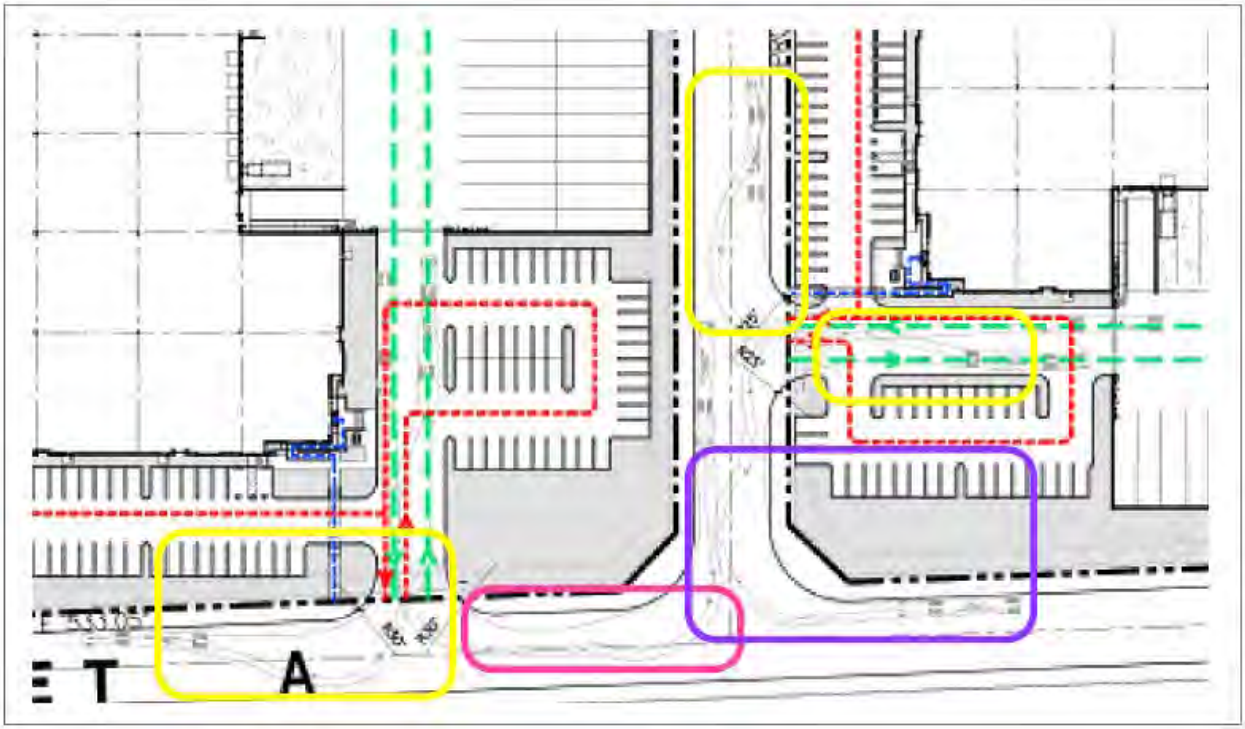
Southwest side of Building 4 driveway at New Public Street A: Trucks/trailers entering and exiting the site require additional maneuvering space across the centerline of each street, meaning that the trucks will need to drive on the "wrong side" of the street into oncoming traffic in order to enter or exit the site. A finding of significance is required in a revised EIR.

Additionally, the overlapping lines along the internal driveway indicate that it is not wide enough to accommodate more than one truck/trailer movement at a time. Queuing/storage space is required on New Public Street A and the EIR has not analyzed these significant impacts. A finding of significance is required in a revised EIR.



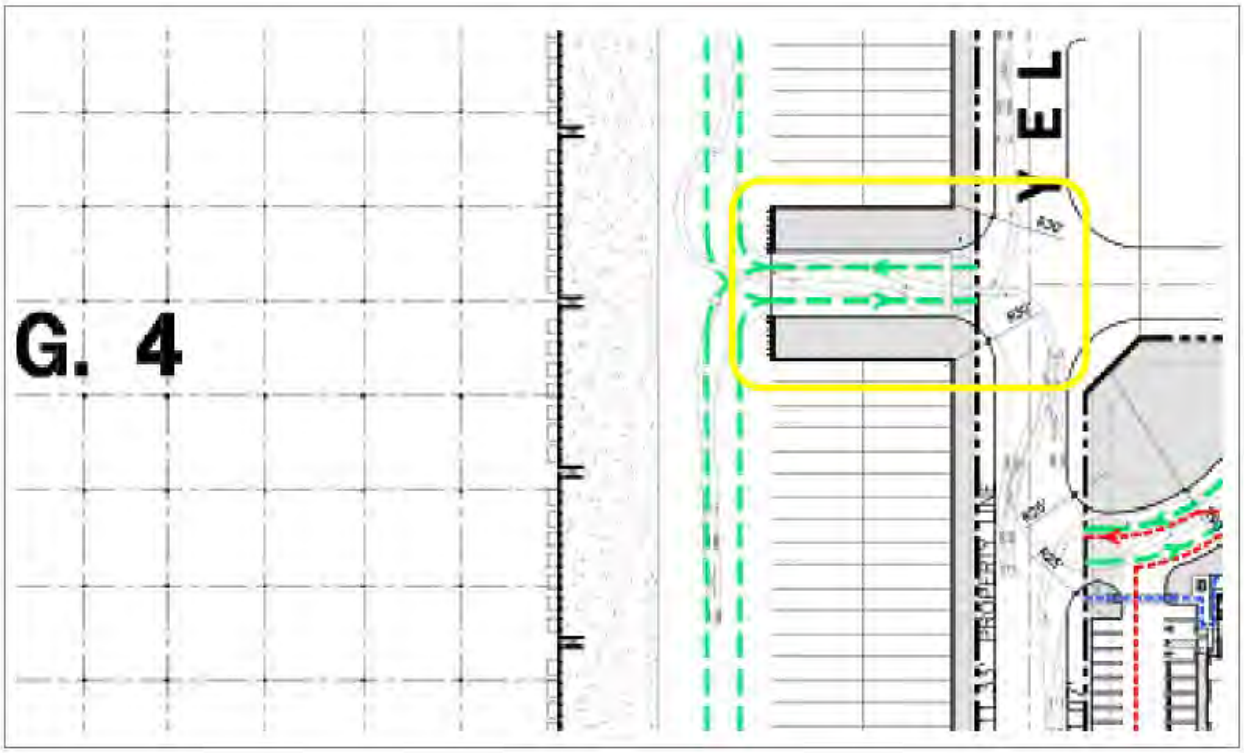
Southeast side of Building 4 driveway at New Public Street A and Southwest side of Building 5 driveway at Yellow Wood Road/New Public Street A: Trucks/trailers entering and exiting the sites require additional maneuvering space across the centerline of each street, meaning that the trucks will need to drive on the "wrong side" of the street into oncoming traffic in order to enter or exit the site. A finding of significance is required in a revised EIR.

Additionally, the overlapping lines along the internal driveway indicate that it is not wide enough to accommodate more than one truck/trailer movement at a time. Queuing/storage space is required on Yellow Wood Road and New Public Street A and the EIR has not analyzed these significant impacts. A finding of significance is required in a revised EIR.



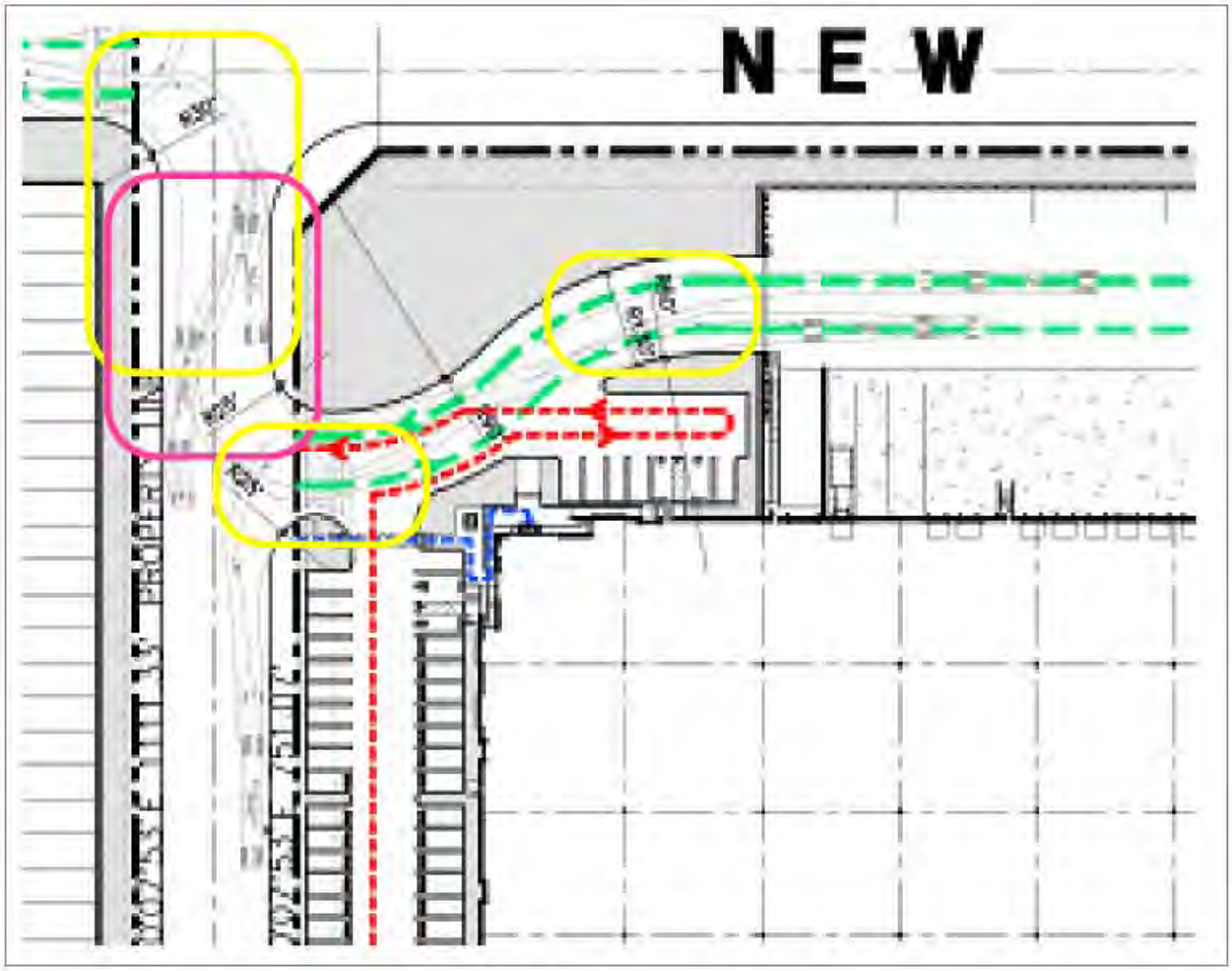
Driveway on East side of Building 4 at intersection of Yellow Wood Road and New Public Street D: Trucks/trailers entering and exiting the site require additional maneuvering space across the centerline of each street, meaning that the trucks will need to drive on the "wrong side" of the street into oncoming traffic in order to enter or exit the site. A finding of significance is required in a revised EIR.

Additionally, the overlapping lines along the internal driveway indicate that it is not wide enough to accommodate more than one truck/trailer movement at a time. Truck/trailer parking stalls are within the truck/trailer loading dock courts in a tandem configuration. This layout and design is not conducive to vehicular maneuvering. These parking stalls that may be in use at any time and further restrict truck/trailer movement, including increasing truck idling as tandem parked trucks require additional time to maneuver, which will also result in increased queuing duration and associated queuing area for trucks/trailer. Queuing/storage space is required on Yellow Wood Road and New Public Street D and the EIR has not analyzed these significant impacts. A finding of significance is required in a revised EIR.



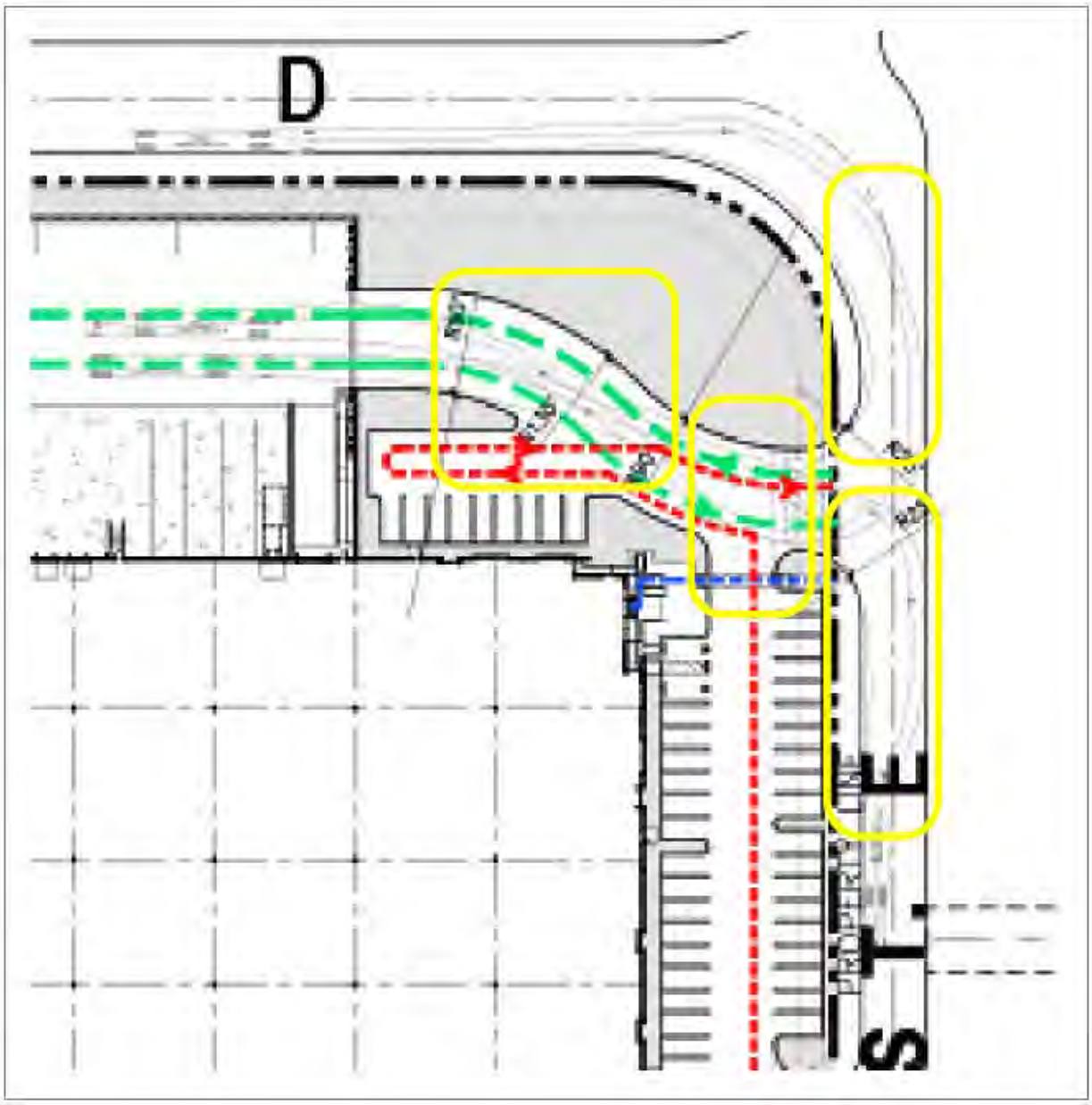
Driveway on Northwest side of Building 5 at Yellow Wood Road and New Public Street D: Trucks/trailers entering and exiting the site require additional maneuvering space across the centerline of each street, meaning that the trucks will need to drive on the "wrong side" of the street into oncoming traffic in order to enter or exit the site. A finding of significance is required in a revised EIR.

Additionally, the overlapping lines along the internal driveway indicate that it is not wide enough to accommodate more than one truck/trailer movement at a time. Queuing/storage space is required on Yellow Wood Road and New Public Street D and the EIR has not analyzed these significant impacts. A finding of significance is required in a revised EIR.



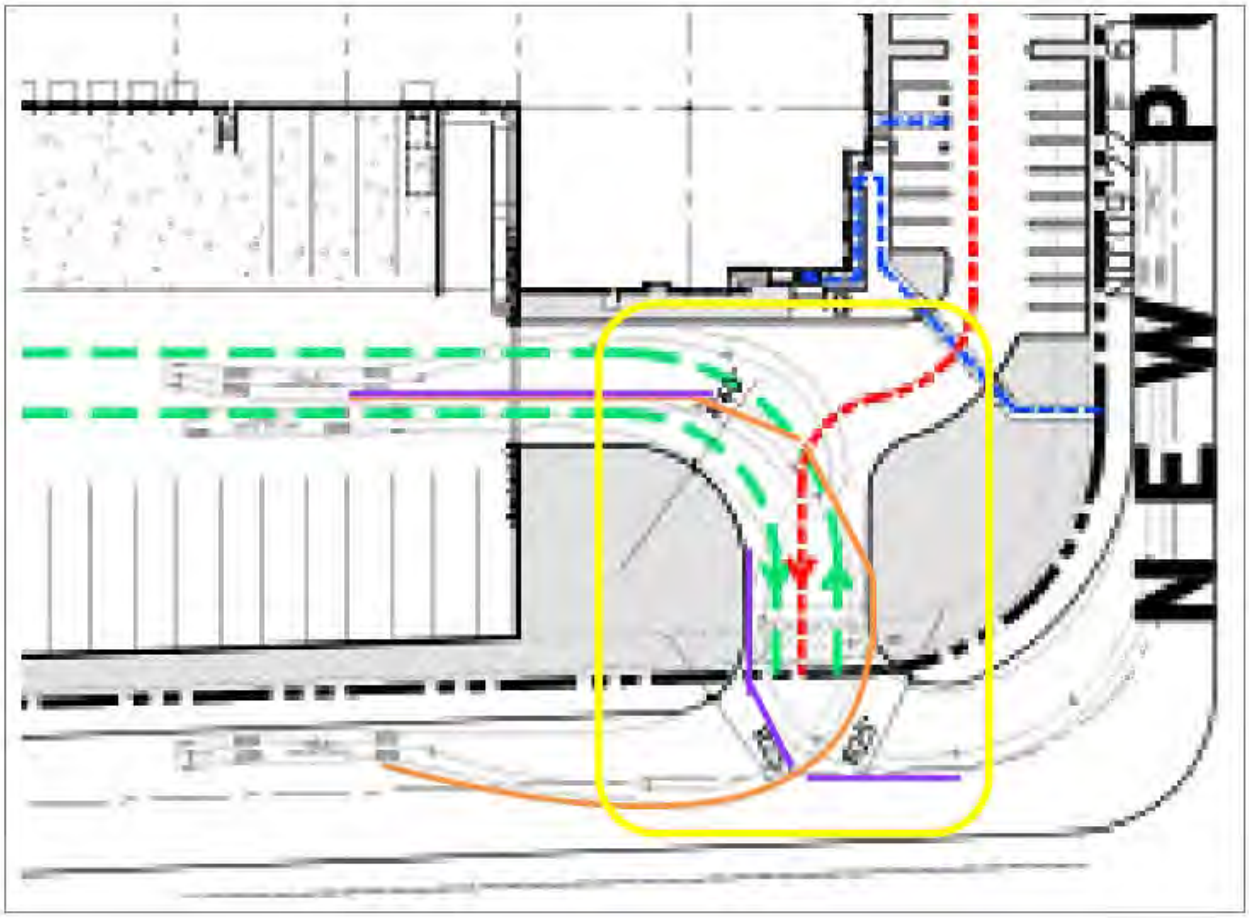
Driveway on Northeast side of Building 5 at New Public Street D/New Public Street E/New Public Street F: Trucks/trailers entering and exiting the site require additional maneuvering space across the centerline of each street, meaning that the trucks will need to drive on the "wrong side" of the street into oncoming traffic in order to enter or exit the site. A finding of significance is required in a revised EIR.

Additionally, the overlapping lines along the internal driveway indicate that it is not wide enough to accommodate more than one truck/trailer movement at a time. Queuing/storage space is required on New Public Street E and New Public Street D and the EIR has not analyzed these significant impacts. A finding of significance is required in a revised EIR.



Driveway on Southeast side of Building 5 at New Public Street A and New Public Street E: Trucks/trailers entering and exiting the site require additional maneuvering space across the centerline of each street, meaning that the trucks will need to drive on the "wrong side" of the street into oncoming traffic in order to enter or exit the site. A finding of significance is required in a revised EIR.

Additionally, the overlapping lines along the internal driveway indicate that it is not wide enough to accommodate more than one truck/trailer movement at a time. Queuing/storage space is required on New Public Street A and New Public Street E and the EIR has not analyzed these significant impacts. A finding of significance is required in a revised EIR.



The EIR states that, "Additionally, clear sight distance would be maintained at all intersections in accordance with City standards." 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 City standards for items related to sight distance, or meaningful analysis of the project's compliance or noncompliance with these 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.

Response 4-27

The comment states that the Draft 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 and includes the commenter's opinion on where in the project design roadway hazards exist. The City's Transportation Engineer and the Rancho Cucamonga Fire Protection District have reviewed preliminary project plans to date and will review and approve final project plans prior to issuance of a building permit pursuant to the City's planning and building process to ensure all new roadways comply with the City's roadway and emergency access requirements as established in the RCMC. As such, the analysis of increased hazards due to a geometric design feature and emergency access in the Draft EIR is adequate and no changes to the Draft EIR are warranted in response to this comment.

Comment 4-28

The EIR states regarding emergency access that, "Additionally, the proposed project would be required to comply with the 2022 California Fire Code as adopted by reference in Rancho Cucamonga Fire Protection District Ordinance No. FD 58. Appendix D of the Ordinance provides additional requirements for fire apparatus access roads, including minimum dimensions to allow for adequate access and turning radii for emergency vehicles accessing the project site during operations. Further, the proposed project would be subject to review by the City and responsible emergency service agencies, thus ensuring that the proposed project would be equipped to provide adequate access for emergency responders." 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. 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.

Response 4-28

The comment states that the Draft 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. As discussed in Section 3.13, "Transportation," of the Draft EIR, the emergency access analysis states the various State and local regulations and requirements that legally bind the project to adherence to the 2022 California Fire Code, adopted by reference in Rancho Cucamonga Fire Protection District Ordinance No. FD 58. Regulatory requirements are not considered as mitigation under CEQA as compliance is required by State and local law. Furthermore, the City's Transportation Engineer and the Rancho Cucamonga Fire Protection District have reviewed preliminary project plans to date and will review and approve final project plans prior to issuance of a building permit pursuant to the City's planning and building process. As such, the emergency access analysis in the Draft EIR is adequate and no changes to the Draft EIR are warranted in response to this comment.

Comment 4-29

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 two others - Reduced Project Alternative and Inclusion of Commercial/Retail Use Alternative. The EIR must be revised to include analysis of a reasonable range of alternatives and foster informed decision making (CEQA § 15126.6). This should include alternatives such as development of the site with a project that reduces all of the proposed project's significant and unavoidable impacts to a less than significant level, and a mixed-use project that provides affordable housing and exclusively local-serving commercial uses that may reduce VMT, GHG emissions, and simultaneously improve Air Quality.

Response 4-29

The comment states that the Draft EIR needs to evaluate a reasonable range of alternatives and should be revised to evaluate alternatives that reduce all significant and unavoidable impacts of the proposed project as well as a mixed-use project that includes affordable housing. As discussed in Chapter 5, "Alternatives," when considering a reasonable range of alternatives pursuant to Section 15126.6, it is important to consider the objectives of the project, the project's significant effects, and unique project considerations. In accordance with Section 15126.6(c), "the range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects." Therefore, the Draft EIR does include a reasonable range of alternatives that achieve the project's objectives while also resulting in similar or reduced environmental impacts. As such, the alternatives analysis in the Draft EIR is adequate and no revisions to the Draft EIR are warranted in response to this comment.

Comment 4-30

6.1 Growth Inducement and 6.3 Significant and Irreversible Environmental Changes

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 within the Neo Industrial Employment and Industrial Employment District land use designations, 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.

As noted throughout this comment letter, the project represents a significant amount of growth in the City. SCAG's Connect SoCal Demographics and Growth Forecast[33] notes that the City will add 12,900 jobs from 2019 to 2035. Based on the EIR's calculation of 1,408 jobs, the project represents 10.9% of the City's job growth over 16 years. A single project accounting for this amount of the projected employment growth over 16 years represents a significant amount of growth. The EIR has not provided a cumulative analysis discussion of projects approved since 2019 (SCAG), General Plan adoption, and/or projects "in the pipeline" to determine the City's progress towards SCAG's employment growth forecast or the General Plan buildout scenario. The EIR also concludes that the project exceeds the growth projections of the RTP/SCS and does not consider this information in this analysis. The EIR must be revised to include a finding of significance.

For example, other recent industrial projects such as 9th and Vineyard[34] (823 employees) and El Camino Project[35] (474 employees) combined with the proposed project will cumulatively generate 2,705 employees, which is 20.9% of the City's employment growth forecast through 2035 accounted for only by three 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 2019 (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. The EIR also concludes that the project exceeds the growth projections of the RTP/SCS and is inconsistent with PlanRC (General Plan) and does not consider this information in this analysis. The EIR must be revised to include a finding of significance.

The EIR attempts to artificially skew the project's significant growth inducing impacts downwards in stating that, "According to the City's General Plan, approximately 35,000 new jobs are anticipated to be created within the City through the 20-year planning horizon, or roughly through 2040 (City of Rancho Cucamonga 2021a). When considering the number of new jobs associated with the proposed project, it would account for 5 percent of the City's projected job growth over the next 20 years." A single project accounting for 5% of the entire City's job growth over a 20 year period is a significant amount of growth. The EIR excludes analyzing the project within its specific land use context of the EIR and generalizes the growth across the entire City buildout scenario. The project site is located within Focus Area 8: Southeast Industrial Area of the General Plan EIR[36]. 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 the Remainder of the City (includes Focus Area 8: Southeast Industrial Area) will add 4,927 jobs from 2020-2040. The EIR's calculation of the project's 1,408 new jobs accounts for 27.4% of all jobs in the Remainder of the City. A single project accounting for this amount of the projected employment growth over 20 years represents a significant amount of growth. The proposed project represents a significant amount of employment growth for the entire City and Focus Area 8 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.

The EIR states that, "…while the project would create economic opportunities by introducing new job opportunities to the project site, it is anticipated that the employment base for the operational phase of the project would come from the existing population *within the City and surrounding area.* As such, because it is anticipated that most of the future employees of the proposed project *would already be living in the City or in nearby areas,* introduction of new

employment opportunities by the proposed project on the project site would not induce substantial unplanned growth in the area," and concludes impacts are less than significant. This conclusion directly contradicts other significant and unavoidable impacts in the EIR. The EIR concludes that the project exceeds the growth projections of the RTP/SCS and is inconsistent with PlanRC (General Plan) and does not consider this information in this analysis. The EIR also concludes that the project-generated baseline and future year VMT for employees will exceed the applicable thresholds, resulting in significant and unavoidable cumulatively considerable impacts to VMT. The EIR does not define the geographic boundaries of the, "surrounding area," or "nearby areas," but the SU VMT impacts indicate that project employees will commute from further distances than existing employees in the City. The EIR also has not presented any substantial evidence that the City's unemployed workforce or that of the surrounding/nearby areas are qualified or interested in work in the industrial sector. The EIR has not provided any substantial evidence to support a less than significant finding and a finding of significance must be included in a revised EIR.

The EIR also utilizes language that is misleading to the public and decision makers in stating that, "…direct economic growth associated with implementation of the proposed project would be *aligned* with the City's General Plan and would not result in significant long-term physical environmental effects." The term "aligned" was chosen carefully to evoke a connotation that the project is consistent with the General Plan and SCAG growth forecasts. However, as discussed above, the project represents a significant amount of growth in the City and an accurate buildout scenario analysis has not been provided. The EIR concludes that the project exceeds the growth projections of the RTP/SCS and does not consider this information in this analysis. This misleading language must be removed in a revised EIR and replaced with discussion of the project's true growth-inducing impacts and a finding of significance.

[33] SCAG Connect SoCal Demographics and Growth Forecast https://www.scag.ca.gov/sites/default/files/2024-05/23-2987-tr-demographics-growth-forecast-final-040424.pdf
[34] 9th and Vineyard Development Project https://ceqanet.opr.ca.gov/2019110456/4
[35] El Camino Project https://ceqanet.lci.ca.gov/2023080369/4
[36] https://www.cityofrc.us/sites/default/files/2021-09/City%20of%20Rancho%20Cucamonga_GP%20Update%20and%20CAP_Draft%20EIR_September%202021.pdf

Response 4-30

The comment states that the Draft EIR does not include a quantified discussion to demonstrate whether the project is within the growth projections of the City's General Plan or SCAG's RTP/SCS, also referred to as the Connect SoCal 2024, and that the proposed project constitutes a significant amount of employment growth, which would indirectly induce unplanned growth in the city. Refer to Responses to Comments 4-5 and 4-20.

Comment 4-31

Further, the EIR does not address that the project is not a permitted use within the Neo-Industrial Employment District of the General Plan. The General Plan states that in the Neo-Industrial land use designation, "More intensive industrial uses with substantive impacts on adjacent uses are not permitted;" and that, "Low impact industrial uses, such as incubator spaces and small warehouses, that are context-sensitive and calibrated to minimize impacts to adjacent residential uses are preferred." The Industrial Employment District of the General Plan permits uses that are, "a broad range of light and medium industrial uses, including light industrial research parks, logistics centers, low impact manufacturing, and machining operations."

The EIR states that, "The proposed industrial distribution facilities, including high-cube fulfillment center (non-sorting), general warehouse, high-cube cold storage warehouse, and accessory office space, are allowable uses within these land use designations." Distribution centers and warehouses are a component of the overall logistics center business chain. Logistics facilitates the overall movement of goods within supply chain management (upstream, downstream, raw materials, finished products, etc.). Distribution is a point on the logistics center business chain as the movement of finished gods for final delivery to the end consumer at their home or commercial stores. Overall, distribution centers are logistics centers and a component of the overall logistics process. Therefore, the proposed project is not permitted within the existing Neo-Industrial Employment District land use designation because it is not a small warehouse and it is not context-sensitive or calibrated to minimize impacts. The project requests a Zoning Map Amendment to be located within the Large Warehouse Overlay, which clearly indicates that it is not a small warehouse. The EIR concludes the project will result in significant and unavoidable cumulatively considerable impacts

to Air Quality and VMT, indicating that it is an intense industrial use with substantive impacts on adjacent uses. The proposed distribution center use is clearly permitted and intended to be located within the Industrial Employment District as it expressly lists logistics centers as a permitted use. A finding of significance must be included as part of a revised EIR due to this inconsistency.

Response 4-31

The comment states that the Draft EIR incorrectly states that the proposed project is consistent with the Neo-Industrial and Industrial Employment District land uses and that the proposed project will intensify industrial uses on the project site as demonstrated by the requested zoning map amendment and significant air quality and VMT impacts. As stated in Response to Comment 4-16, Chapter 2, "Project Description," of the Draft EIR states the proposed project's large distribution/fulfillment center uses are permitted on parcels zoned as NI and IE with issuance of a CUP and a Master Plan for the site pursuant to Section 17.30.030, "Allowed Land Uses and Permit Requirements", of the RCMC. No changes to the Draft EIR are warranted based on this comment.

Comment 4-32

The EIR states that, "the project would be subject to the energy conservation requirements of the California Energy Code (Title 24, Part 6, of the California Code of Regulations, California's Energy Efficiency Standards for Residential and Nonresidential Buildings) and the California Green Building Standards Code (Title 24, Part 11 of the California Code of Regulations). The California Energy Code provides energy conservation standards for all new and renovated nonresidential buildings constructed in California, and the Green Building Standards Code requires solar access, natural ventilation, and stormwater capture." The State of California lists three approved compliance modeling softwares[37] for non-residential buildings: CBECC-Com, EnergyPro, and IES VE. CalEEMod and EMFAC are not listed as approved softwares. The CalEEMod and spreadsheet-based modeling in Appendix B 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. If the project applies for a building permit on or after January 1, 2026, it must comply with the 2025 Building Energy Efficiency Standards, and only CBECC is currently listed as an approved software for the updated standards[38]. 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 in a revised EIR.

[37] 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

[38] California Energy Commission 2025 Energy Code Compliance Software https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2025-energy-code-compliance-software

Response 4-32

This comment states that The CalEEMod and spreadsheet-based modeling in Appendix B 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. See Response to Comment 4-9. No changes to the Draft EIR are warranted in response to this comment.

Comment 4-33

Conclusion

For the foregoing reasons, GSEJA believes the EIR is flawed and a revised EIR must be prepared for the proposed project and recirculated 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.

Response 4-33

This comment states that the commenter believes the Draft EIR is flawed and should be revised based on the comments provided in this comment letter. In addition, this comment requests that the commenter be added to the public interest list for any subsequent environmental documents related to the proposed project. As demonstrated in the response to comments above, the Draft EIR has been revised in this Final EIR, where appropriate, but these changes do not trigger a recirculation of the Draft EIR pursuant to Section 15088.5 of the State CEQA Guidelines. As such, the Final EIR is adequate and accurate pursuant to CEQA. The commenter will be included in the distribution list of any subsequent environmental documentation for the proposed project.

Comment 4-34

We have reviewed the October 2025 Draft Environmental Impact Report ("DEIR") for the Arrow Commerce Center ("Project") located in the City of Rancho Cucamonga ("City"). The Project proposes to construct 1,830,729-square-feet ("SF") of warehouse and office space and 968 parking spaces on the 94-acre site.

Our review concludes that the DEIR fails to adequately evaluate the Project's air quality and health risk impacts. As a result, emissions and health risk impacts associated with construction and operation of the proposed Project may be underestimated and inadequately addressed. A revised Environmental Impact Report ("EIR") should be prepared to adequately assess and mitigate the potential air quality and health risk impacts that the project may have on the environment.

Response 4-34

This comment provides an introduction to the comment letter and states that the DEIR fails to adequately evaluate the Project's air quality and health risk impacts. The Draft EIR does fully evaluate every air quality, HRA, greenhouse gas, and energy threshold as established by Appendix G of the State CEQA Guidelines. The project was determined to less than significant after mitigation for all air quality, HRA, GHG emissions, and energy impacts, with the exceptions of Impact 3.2-2, as operational impacts associated with VOC emissions would exceed SCAQMD's mass emission threshold after mitigation. No changes to the Draft EIR are warranted in response to this comment.

Comment 4-35

Air Quality

Unsubstantiated Input Parameters Used to Estimate Project Emissions

When reviewing the Project's CalEEMod output files, provided in the Air Quality, Greenhouse Gas Emissions, and Health Risk Assessment Modeling Results ("AQ Report") provided as Appendix B to the DEIR, we identified several model inputs related to Project construction and operation that are inconsistent with information disclosed in the DEIR. The impacts of these changes are quantified in the section of this letter titled "Updated Analysis Indicates a Potentially Significant Air Quality Impact." A revised EIR should be prepared to include an updated air quality analysis that provides a more detailed evaluation of the impact Project construction and operation may have on local and regional air quality.

Response 4-35

This comment states that several model inputs related to project construction and operation that are inconsistent with information disclosed in the Draft EIR. This comment is a general comment, as this comment does not specify which model inputs are inconsistent with information disclosed elsewhere in the Draft EIR. As noted in the responses below, model inputs are consistent with information disclosed in the Draft EIR, and any small inconsistencies raised have been addressed. Responses to each comment related to this general comment are provided below. No changes to the Draft EIR are warranted in response to this comment.

Comment 4-36

Failure to Include Parking Land Use

The DEIR proposes to construct 968 vehicle parking spaces and 444 truck trailer parking spaces, stating:

> "The project also includes loading docks for truck trailers, 968 vehicle parking spaces, 444 truck trailer parking spaces, 6 new public streets, water quality basins, utility infrastructure, and exterior lighting and signage. The proposed project would develop the project site with 44 acres of paved or other impervious surface area and provide approximately 10 percent landscape coverage" (p. ES-2).

Review of the CalEEMod output files demonstrates that the "Rancho Arrow Route Construction Detailed Report" model does not include any parking lot space (see screenshot below) (Appendix B, pp. 24, 25).

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Unrefrigerated Warehouse-No Rail	1,561	1000sqft	35.8	1,561,256	275,585	—	—	—
Refrigerated Warehouse-No Rail	173	1000sqft	3.98	173,473	39,746	—	—	—
General Office Building	96.0	1000sqft	2.20	96,000	37,431	—	—	—

However, further review of the CalEEMod output files demonstrates that the "Arrow Commerce Center Detailed Report" operational model includes 44 acres of parking lot space (see screenshot below) (Appendix B, pp. 77, 78).

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Unrefrigerated Warehouse-No Rail	1,561	1000sqft	35.8	1,561,256	8.00	0.00	—	—
Refrigerated Warehouse-No Rail	173	1000sqft	3.98	173,473	0.00	0.00	—	—
General Office Building	96.0	1000sqft	2.20	96,000	0.00	0.00	—	—
Parking Lot	44.0	Acre	44.0	0.00	0.00	0.00	—	—

The "Rancho Arrow Route Construction Detailed Report" construction model therefore underestimates the proposed parking lot space by 44 acres. This underestimation presents an issue, as the land use size feature is used throughout CalEEMod to determine default variable and emission factors that affect the model's construction calculations.[1] By underestimating the size of the proposed mixed-use space, the model underestimates the Project's construction emissions and should not be relied upon to determine Project significance.

[1] "CalEEMod User Guide." CAPCOA, April 2022, available at: https://www.caleemod.com/documents/userguide/01_User%20Guide.pdf, p. 19.

Response 4-36

This comment states that the modeling underestimated the parking lot space by 44 acres. Based on this comment, the acreage related to constructing the parking area has been added to the CalEEMod modeling and analysis. These changes are reflected within the "Air Quality," "Energy," and "Greenhouse Gas (GHG) Emissions and Climate Change" sections as shown in Chapter 3, "Revisions to the Draft EIR," of this Final EIR and do not change impact conclusions or significance determinations in the Draft EIR.

Comment 4-37

Underestimated Number of Demolition Hauling Trips

The DEIR indicates that the Project "includes the demolition and site clearing of existing paved surface areas" (p. ES-2). Review of the CalEEMod output files demonstrates that the "Rancho Arrow Route Construction Detailed Report" model includes 555,664-SF of tons of demolition debris (see screenshot below) (Appendix B, pp. 62).

Phase Name	Material Imported (Ton of Debris)	Material Exported (Ton of Debris)	Acres Graded (acres)	Material Demolished (Building Square Footage)	Acres Paved (acres)
Demolition	0.00	0.00	0.00	555,664	—
Grading	—	10,000	80.7	0.00	—
Concrete Imports	86,900	—	0.00	0.00	—
Paving	0.00	0.00	0.00	0.00	44.0

However, further review of the model demonstrates that there are zero hauling trips for the construction demolition phase (see screenshot below) (Appendix B, pp. 60).

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	—	—	—	—
Demolition	Worker	15.0	18.5	LDA,LDT1,LDT2
Demolition	Vendor	—	10.2	HHDT,MHDT
Demolition	Hauling	0.00	20.0	HHDT
Demolition	Onsite truck	—	—	HHDT

Note: the above screenshot does not capture the entire table.

This is incorrect, as according to the CalEEMod User's Guide:

> "Hauling trips are based on the amount of material that is demolished (as defined in the Demolition screen) or imported or exported (as defined in the Dust from Material Movement screen) assuming a truck can handle 16 cubic yards of material."[2]

Therefore, CalEEMod calculates a default number of hauling trips based upon the amount of demolition material inputted into the model. As the model includes only zero demolition hauling trips, we can assume that the default number of hauling trips was erroneously changed from the default calculation to zero. As such, the model fails to adequately account for the demolition inputted into the model and required for Project construction.

This omission presents an issue, as CalEEMod uses the number of hauling trips to estimate construction-related emissions associated with on-road vehicles and truck traffic.[3] By excluding the hauling trips required for demolition, the model underestimates the Project's construction-related emissions and should not be relied upon to determine Project significance.

[2] CalEEMod User Guide." CalEEMod 2022.1, April 2022, *available at*: https://www.caleemod.com/documents/userguide/CalEEMod_User_Guide_v2022.1.pdf, p. C-19.
[3] CalEEMod User Guide." CalEEMod 2022.1, April 2022, *available at*: https://www.caleemod.com/documents/userguide/CalEEMod_User_Guide_v2022.1.pdf, p. 36.

Response 4-37

This comment states that the project did not evaluate the truck trips associated with demolition hauling and thus underestimated construction emissions. The project applicant in coordination with the City provided Ascent with all truck trips for the project, including those assumed for transport of building materials and concrete imports, which were included in the truck trip modeling. Thus, the project did not underestimate truck trips. No changes to the Draft EIR are warranted in response to this comment.

Comment 4-38

Incorrect Application of Construction Engine Tier 4 Final Mitigation

The "Rancho Arrow Route Construction Detailed Report" model includes the following construction mitigation measure (see screenshot below) (Appendix B, pp. 25).

Sector	#	Measure Title
Construction	C-5	Use Advanced Engine Tiers

Accordingly, the "Rancho Arrow Route Construction Detailed Report" model also includes changes to the off-road construction equipment input parameters and assumes that the Project's off-road equipment fleet would meet Tier 4 Final emissions standards (see screenshot below) (Appendix B, pp. 58, 59).

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Demolition	Rubber Tired Dozers	Diesel	Tier 4 Final	2.00	8.00	367	0.40
Demolition	Excavators	Diesel	Tier 4 Final	3.00	8.00	36.0	0.38
Demolition	Concrete/Industrial Saws	Diesel	Tier 4 Final	1.00	8.00	33.0	0.73
Grading	Graders	Diesel	Tier 4 Final	1.00	8.00	148	0.41
Grading	Excavators	Diesel	Tier 4 Final	2.00	8.00	36.0	0.38
Grading	Tractors/Loaders/Back	Diesel	Tier 4 Final	2.00	8.00	84.0	0.37
Grading	Scrapers	Diesel	Tier 4 Final	2.00	8.00	423	0.48
Grading	Rubber Tired Dozers	Diesel	Tier 4 Final	1.00	8.00	367	0.40
Building Construction	Forklifts	Diesel	Tier 4 Final	3.00	8.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Cranes	Diesel	Tier 4 Final	1.00	7.00	367	0.29
Building Construction	Welders	Diesel	Tier 4 Final	1.00	8.00	46.0	0.45
Building Construction	Tractors/Loaders/Back hoes	Diesel	Tier 4 Final	3.00	7.00	84.0	0.37
Paving	Pavers	Diesel	Tier 4 Final	2.00	8.00	81.0	0.42
Paving	Paving Equipment	Diesel	Tier 4 Final	2.00	8.00	89.0	0.36
Paving	Rollers	Diesel	Tier 4 Final	2.00	8.00	36.0	0.38
Architectural Coating	Air Compressors	Diesel	Tier 4 Final	1.00	6.00	37.0	0.48

Regarding the use of advanced engine tiers, the DEIR includes the following construction equipment list (see excerpt below) (p. 3.2-17).

Table 3.2-6 Construction Equipment Assumptions

Phase Name	Equipment Type	Engine Tier	Quantity	Hours of Use Per Day	Horsepower
Demolition and Site Clearing	Rubber Tired Dozers	Tier 4 Final	2	8	367
	Excavators	Tier 4 Final	3	8	36
	Concrete/Industrial Saws	Tier 4 Final	1	8	33
Grading and Excavation	Graders	Tier 4 Final	1	8	148
	Excavators	Tier 4 Final	2	8	36
	Tractors/Loaders/Backhoes	Tier 4 Final	2	8	84
	Scrapers	Tier 4 Final	2	8	423
	Rubber Tired Dozers	Tier 4 Final	1	8	367
Building Construction and Infrastructure Improvements	Forklifts	Tier 4 Final	3	8	82
	Generator Sets	Fleet Average	1	8	14
	Cranes	Tier 4 Final	1	7	367
	Welders	Tier 4 Final	1	8	46
	Tractors/Loaders/Backhoes	Tier 4 Final	3	7	84
Concrete Imports			No equipment		
Paving	Pavers	Tier 4 Final	2	8	81
	Paving Equipment	Tier 4 Final	2	8	89
	Rollers	Tier 4 Final	2	8	36
Architectural Coating	Air Compressors	Tier 4 Final	1	6	37

Source: Equipment list, engine tier, and equipment quantity Provided by BTC III Arrow Route CC, LP, 2023; adapted by Ascent in 2024.

However, the inclusion of more stringent emissions standards remains unsupported as the DEIR does not explicitly require advanced engine tiers, specifically Tier 4 Final, through a formal mitigation measure. According to the Association of Environmental Professionals ("AEP") *CEQA Portal Topic Paper* on mitigation measures:

> "While not 'mitigation,' a good practice is to include those project design feature(s) that address environmental impacts in the mitigation monitoring and reporting program (MMRP). Often the MMRP is all that accompanies building and construction plans through the permit process. If the design features are not listed as important to addressing an environmental impact, it is easy for someone not involved in the original environmental process to approve a change to the project that could eliminate one or more of the design features without understanding the resulting environmental impact."[4]

As the inclusion of Tier 4 Final emissions standards on the Project site is not formally included as a mitigation measure, we cannot guarantee that it would be implemented, monitored, and enforced on the Project site. By including Tier 4 Final emissions standards without properly committing to its implementation, the model may underestimate the Project's construction emissions and should not be relied upon to determine Project significance.

[4] "CEQA Portal Topic Paper Mitigation Measures." AEP, February 2020, *available at*: https://ceqaportal.org/tp/CEQA%20Mitigation%202020.pdf, p. 6.

Response 4-38

This comment states that as the inclusion of Tier 4 Final emissions standards on the project site is not formally included as a mitigation measure, it cannot be guaranteed that it would be implemented, monitored, and enforced on the project site and therefore, the model may underestimate the project's construction emissions and should not be relied upon to determine project significance. The inclusion of Tier 4 engines is a project design feature that has been committed to by the project applicant, and thus, not considered a mitigation measure. As a project feature, it can be appropriately enforced. Additionally, the project is modeled as such, and the emissions reflect the use of Tier 4 engines. Activity and equipment assumptions were provided by the project applicant, as shown on page 3.2-17 of the Air Quality section in the Draft EIR. No changes to the Draft EIR are warranted in response to this comment.

Comment 4-39

Updated Analysis Indicates a Potentially Significant Air Quality Impact

To more accurately estimate the Project's construction-related emissions, we prepared a construction CalEEMod model, using the Project-specific information provided by the DEIR. We included the parking land use, omitted the reduction to demolition hauling trips, and excluded the construction-related mitigation and incorrect application of Tier 4 Final emissions standards. All other inputs remain consistent with the DEIR's model.

Our updated analysis estimates that the Project's construction-related volatile organic compounds ("VOC") emissions exceed the South Coast Air Quality Management District ("SCAQMD") daily threshold of 75 pounds per day ("lbs/day") (see table below).

SWAPE Criteria Air Pollutant Emissions Estimates

Construction	VOC (lbs/day)
DEIR	31
SWAPE	320
SCAQMD Threshold	**75**
Exceeds?	**Yes**

According to our analysis, the construction-related VOC emissions are estimated to be approximately 320 lbs/day, exceeding the SCAQMD daily threshold. This finding indicates a potentially significant air quality impact that the DEIR did not identify or address. In our opinion, a revised EIR should be conducted to provide a more accurate evaluation of the potential air quality impact from the Project on the environment and mitigate significant impacts accordingly.

Response 4-39

This comment states that according to the SWAPE analysis, the construction-related VOC emissions are estimated to be approximately 320 lbs/day, exceeding the SCAQMD daily threshold. In the modeled presented for the project, the unmitigated VOC emissions were 310 lbs/day. This exceeds SCAQMD's daily threshold, and thus, Mitigation Measure 3.2-2a (Construction Low VOC Coating) has been incorporated. This mitigation measure would reduce VOC emissions during construction activities involving the application of coatings by requiring the construction contractors to use low-VOC coatings with a VOC content of 10 g/L or less during all phases of construction or comply with SCAQMD Rule 113 and extend the painting schedule to ensure VOC emissions do not exceed SCAQMD regional construction thresholds. Prior to the issuance of a building permit, the project applicant shall submit a list of coatings to be used, their respective VOC content, and a summary of the surface area to be painted to the City. The SWAPE analysis did not incorporate Mitigation Measure 3.2-2a which would also reduce the SWAPE analysis to less than significant levels. No changes to the Draft EIR are warranted in response to this comment.

Comment 4-40

Failure to Implement All Feasible Mitigation to Reduce Emissions

The DEIR estimates that the Project's operational VOC emissions would exceed the applicable SCAQMD threshold (see screenshot below) (p. 3.2-32, Table 3.2-14).

Table 3.2-14 Estimated Mitigated Operational Emissions (Mass Regional Pounds Per Day)

Emissions Source	VOC	NO_X	CO	PM_{10}	$PM_{2.5}$	SO_2
Area [1]	44	—	—	—	—	—
Energy	—	—	—	—	—	—
Medium Duty Trucks [2]	<1	4	1	1	<1	<1
Heavy Duty Trucks [3]	<1	33	8	5	2	<1
Workers	10	11	134	31	8	<1
Yard Trucks [4]	—	—	—	—	—	—
TRUs [4]	—	—	—	—	—	—
Forklifts [5]	—	—	—	—	—	—
Maximum Daily	55	47	143	38	10	1
SCAQMD Regional Operations Threshold	55	55	550	150	55	150
Exceeds Threshold?	Yes	No	No	No	No	No

Notes: VOC = reactive organic gases; NO_X = oxides of nitrogen; CO = carbon monoxide; PM_{10} = fine particulate matter; $PM_{2.5}$ = respirable particulate matter; SO_2 = sulfur dioxide

[1] Assumes landscaping equipment will be 100 percent zero-emissions at Opening Day (Mitigation Measure 3.2-2b).

[2] Assumes 50 percent of trucks are zero-emissions at Opening Day (Mitigation Measure 3.2-2b).

[3] Assumes 100 percent of yard equipment is zero-emissions at Opening Day (Mitigation Measure 3.2-2b).

[4] Assumes 100 percent of TRUs would be plugged in and TRUs would not run on diesel at any point on site (Mitigation Measure 3.2-2c).

Source: Modeled by Ascent in 2021.

The DEIR concludes that the impacts associated with operation of the Project would be significant-and-unavoidable, stating:

> "After the implementation of Mitigation Measure 3.2-2b, through 3.2-2d, VOC emissions would not be reduced to below thresholds, but NOx and CO emissions would be reduced below the thresholds with mitigation (Table 3.2 - 14). Therefore, even with implementation of mitigation, operational impact s related to VOC emissions would be significant and unavoidable" (p. 3.2-32).

While we agree that the Project would result in significant air quality impacts, the DEIR's assertion that this impact is significant-and-unavoidable is unreliable. According to CEQA Guidelines §15096(g)(2):

> "When an updated EIR has been prepared for a project, the Responsible Agency shall not approve the project as proposed if the agency finds any feasible alternative or feasible mitigation measures within its powers that would substantially lessen or avoid any significant effect the project would have on the environment."[5]

As such, the DEIR is required under CEQA to implement all feasible mitigation to reduce impacts to a less-than-significant level. To reduce the Project's air quality impacts to the maximum extent possible, additional feasible mitigation measures should be incorporated, 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, incorporating all feasible mitigation to reduce emissions to the maximum extent possible.

[5] "Cal. Code Regs. tit. 14 § 15096." California Legislature, available at: https://casetext.com/regulation/californiacode-of-regulations/title-14-natural-resources/division-6-resources-agency/chapter-3-guidelines-forimplementation-of-the-california-environmental-quality-act/article-7-eir-process/section-15096-process-for-aresponsible-agency.

Response 4-40

The comment states that the Draft EIR is required under CEQA to implement all feasible mitigation to reduce impacts to a less-than-significant level. To reduce the project's air quality impacts to the maximum extent possible, additional feasible mitigation measures should be incorporated, such as those suggested in the section of this letter titled "Feasible Mitigation Measures Available to Reduce Emissions." As shown in Section 3.2, "Air Quality, the Draft EIR already includes Mitigation Measures 3.2-2a (Construction Low VOC Coating), 3.2-2b (Zero Emissions Electrical Design and Operation), 3.2-2c (Transport Refrigerant Unit Electrical Hookups for Cold Storage Uses), and 3.2-2d

(Idling Limits During Operations) to reduce operational air quality impacts to the maximum extent possible. Thus, no changes to the Draft EIR are warranted in response to this comment.

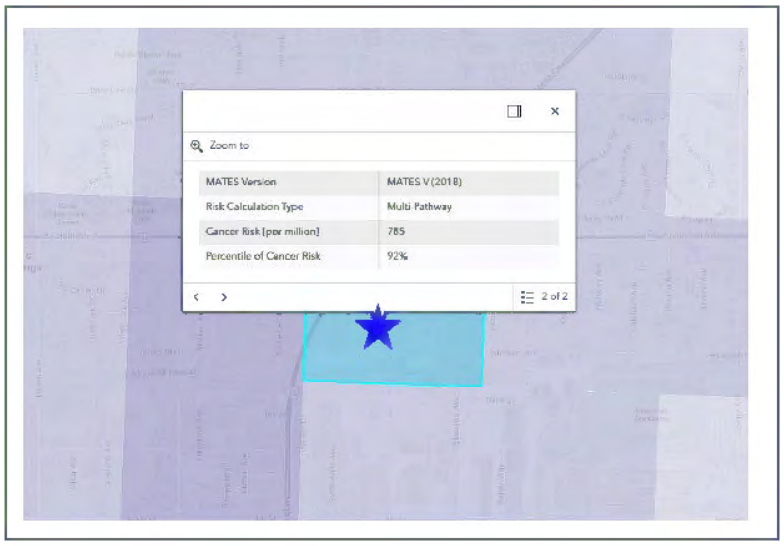
Comment 4-41

Disproportionate Health Risk Impacts of Warehouses on Surrounding Communities

The development of the proposed Project may contribute to the disproportionate health risk impact that warehouses already pose on community members living, working, and going to school within the immediate area of the Project site. According to the SCAQMD, communities of color living within a half mile of warehouses face higher health risks, including increased rates of asthma and heart attacks, along with a greater environmental burden.[6]

Specifically, 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.[7] Another study indicates "neighborhoods with lower household income levels and higher percentages of minorities are expected to have higher probabilities of containing warehousing facilities."[8] Furthermore, a report authored by the Inland Empire-based People's Collective for Environmental Justice and University of Redlands explains that the warehouse and logistics industry is expanding rapidly, with many new projects being built in low-income communities of color. These projects attract high volumes of polluting truck traffic, which emits harmful nitrogen oxide and particulate matter, contributing to severe health issues like asthma, COPD, cancer, and premature death.[9] Despite these public health impacts, warehouse development continues to accelerate, with the Inland Empire adding 10 to 25 million square feet of new industrial space annually.[10]

The Data Visualization Tool for Mates V, a monitoring and evaluation study conducted by SCAQMD, demonstrates that the County already exhibits a heightened residential carcinogenic risk from exposure to air toxics.[11] Specifically, the location of the Project site is in the 92nd percentile of highest cancer risks in the South Coast Air Basin ("SCAB"), with a cancer risk of 785 in one million (see screenshot below).[12]



[6] "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.

[7] "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-targetwarehouses-bid-to-curb-health-damaging-truck-pollution.

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

[9] "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.

[10] "2020 North America Industrial Big Box Review & Outlook." CBRE, 2020, *available at*: https://www.cbre.com/-/media/project/cbre/shared-site/insights/local-responses/industrial-big-box-report-inland-empire/local-response-2020-ibb-inland-empire-overview.pdf, p. 2.

[11] "Residential Air Toxics Cancer Risk Calculated from Model Data in Grid Cells." MATES V, 2018, *available at*: https://experience.arcgis.com/experience/79d3b6304912414bb21ebdde80100b23/page/Main-Page/?views=Clicktabs-for-other-data%2CGridded-Cancer-Risk; see also: "MATES V Multiple Air Toxics Exposure Study." SCAQMD, available at: http://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v.

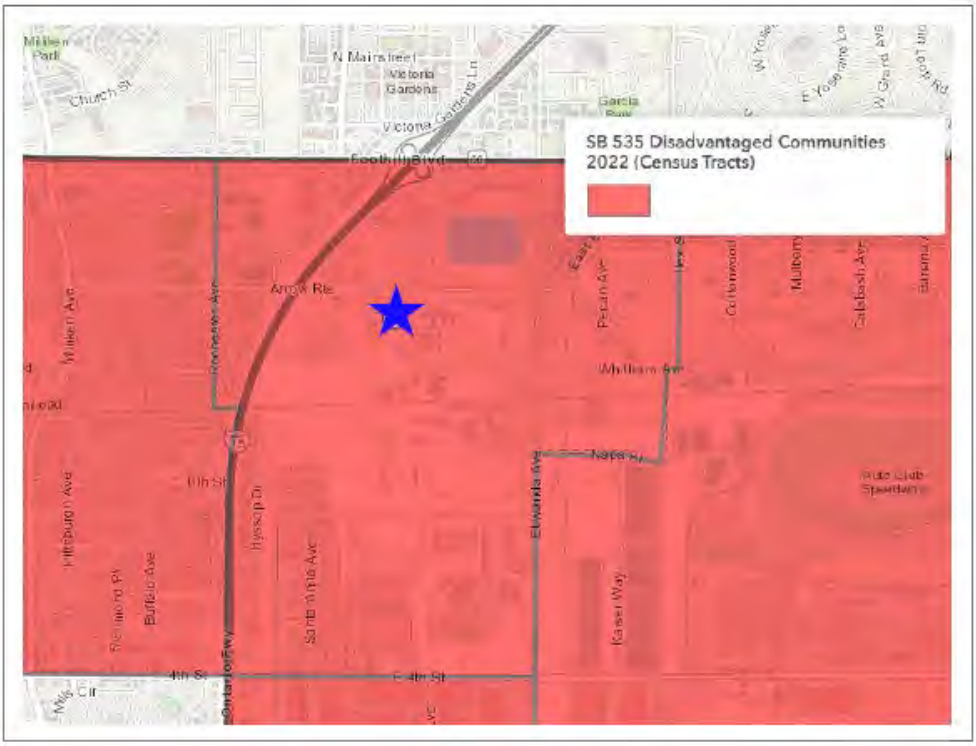
[12] "Gridded Cancer Risk." SCAQMD, *available at*: https://experience.arcgis.com/experience/79d3b6304912414bb21ebdde80100b23/page/Main-Page/?data_id=dataSource_112-7c8f2a4db79b4a918d46b4e8985a112b%3A20315&views=Click-tabs-for-otherdata%2CGridded-Cancer-Risk.

Response 4-41

The comment states that the proposed project would disproportionally impact disadvantaged communities and the Draft EIR does not discuss such impacts. As stated in Response to Comment 4-7, analysis of environmental justice as it relates to disadvantaged communities is not considered within the purview of CEQA and is not identified as an environmental issue area in accordance with Appendix G of the State CEQA Guidelines. Section 3.2, "Air Quality," evaluated the air quality impacts associated with implementation of the proposed project, which included a health risk assessment to evaluate the risks to the health in nearby communities. As demonstrated in Section 3.2 of the Draft EIR, implementation of Mitigation Measures 3.2-2b through 3.2-2d would reduce lifetime cancer risk below SCAQMD's cancer risk threshold and health risk impacts were determined to be less than significant with mitigation. No changes to the Draft EIR are warranted in response to this comment.

Comment 4-42

Additionally, according to CalEnviroScreen's Senate Bill ("SB") 535 Disadvantaged Communities Map, the Project site is identified as a designated disadvantaged community (see screenshot below).[13]

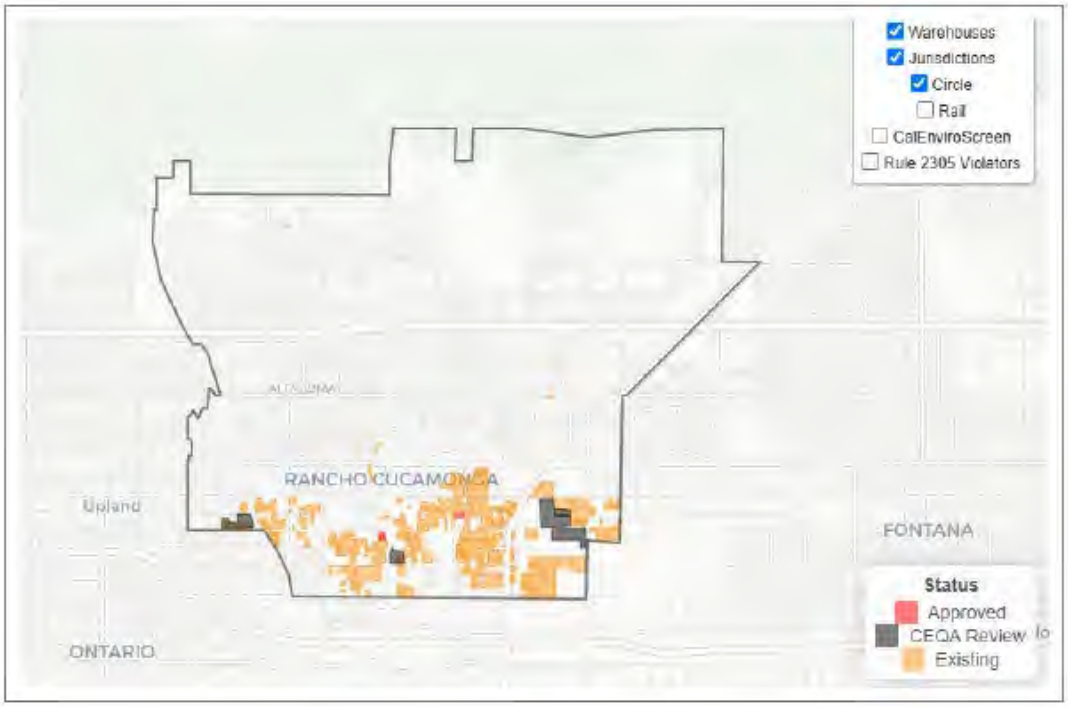


SB 535 provides funding for development projects that provide a benefit to disadvantaged communities. CalEPA has been given the responsibility for identifying those communities based on "geographic, socioeconomic, public health, and environmental hazard criteria."[14] The Project may therefore worsen disproportionate health risks for community members within the immediate area, a concern underscored by the mandates of SB 1000. SB 1000, enacted to address environmental justice concerns, requires local governments to integrate environmental justice elements into their planning processes, particularly focusing on reducing health risks for disadvantaged communities.[15] As the DEIR indicates that the proposed Project site is located approximately 0.4 miles from residential receptors (p. 3.2-20), the Project should comply with the objectives of SB 1000.

In accordance with the CA DOJ guidelines, the effects of greenhouse gas emissions and air pollutants from warehouses should be evaluated cumulatively. The CA DOJ states that cumulative impacts should be evaluated by considering the project's incremental effects alongside past, present, and future projects, even if the project alone does not exceed significance thresholds.[16] To more adequately assess the Project's impact on disadvantaged communities, both existing and future warehouse developments should be considered during the environmental review process.

As the Project site is in an SB 535 disadvantaged community that experiences disproportionately high levels of pollution, we recommend the DEIR reevaluate the Project's cumulative health risks to more sufficiently align with CA DOJ guidelines and SB 1000 environmental justice requirements.

Lastly, the Warehouse Cumulative Impact Tool for Community dashboard ("Warehouse CITY"), developed by the Redford Conservancy at Pitzer College and Radical Research LLC, is a tool that visualizes and quantifies existing, potential, and approved warehouse locations across Southern California. Review of Warehouse CITY reveals that there are 252 existing warehouses currently in Rancho Cucamonga, 2 more that have been approved, and 5 that are currently under CEQA review (see screenshot below).[17]



The presence of numerous existing warehouses in the City underscores the need to reassess the Project's cumulative health risks pursuant to CA DOJ guidelines and SB 1000 environmental justice requirements.

[13] "SB 535 Disadvantaged Communities (2022 Update)." California Environmental Protection Agency, *available at*: https://experience.arcgis.com/experience/1c21c53da8de48f1b946f3402fbae55c/page/SB-535-Disadvantaged-Communities/

[14] "Final Designation of Disadvantaged Communities." CalEPA, *available at*: https://calepa.ca.gov/wpcontent/uploads/2022/05/Updated-Disadvantaged-Communities-Designation-DAC-May-2022-Eng.a.hp_-1.pdf, p. 1.

[15] "Environmental Justice in Local Land Use Planning." CA DOJ, *available at*: https://oag.ca.gov/environment/sb1000.

[16] "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act." CA DOJ, *available at*: https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/warehouse-bestpractices.pdf, p. 6.

[17] "Warehouse and Air Quality Mapping." Pitzer College & Radical Research LLC, *available at*: https://radicalresearch.shinyapps.io/WarehouseCITY/.

Response 4-42

The comment states that the proposed project would disproportionally impact disadvantaged communities and the Draft EIR does not discuss such impacts. As stated in Response to Comment 4-7 above, analysis of environmental justice as it relates to disadvantaged communities is not considered within the purview of CEQA and is not identified as an environmental issue area in accordance with Appendix G of the State CEQA Guidelines. As this comment does not pertain to the accuracy or adequacy of the Draft EIR, no changes to the Draft EIR are warranted in response to this comment.

Comment 4-43

Diesel Particulate Matter Emissions Inadequately Evaluated

The DEIR concludes that the proposed Project would result in a less-than-significant health risk impact based on a quantified operational health risk assessment ("HRA"). Specifically, the DEIR estimates that the maximum incremental cancer risk posed to nearby, existing residential sensitive receptors associated with exposure to diesel particulate matter ("DPM") emissions during Project operation would be 2-in one million after mitigation, which would not exceed the SCAQMD significance threshold of 10 in one million (see excerpt below) (p. 3.2-35, Table 3.2-18).

Table 3.2-18 Estimate of Mitigated Operations-Related Health Risk (chances per million)

Risk Type	Residential	School	Park
Maximum Incremental Cancer Risk	2	0.02	0.05
Chronic Hazard Index	<0.001	<0.001	<0.001
Cancer Risk Threshold	10	10	10
Hazard Index Threshold	1.0	1.0	1.0
Exceed Thresholds?	No	No	No

Source: Modeled by Ascent in 2025.

However, the DEIR's evaluation of the Project's potential health risk impacts, as well as the subsequent less-than-significant impact conclusion, is insufficient for three reasons.

First, the DEIR's operational HRA underestimates Fraction of Time At Home ("FAH") values for third trimester, infant, and child receptors. It uses an FAH value of 0.85 for third trimester (age -0.25 to 0) and infant (age 0 to 2) receptors, and 0.72 for child receptors (age 2 to 16) (see excerpt below) (p. 3.2-23, Table 3.2-9).

Table 3.2-9 Cancer Risk Exposure Factors by Age Group and By Receptor Type

Parameter	Abbr	Residential				School	Park	
		3rd Trimester	0<2	2<16	16>30	2<16	0<2	2<16
Daily Breathing Rate (mg/kg/day)[a]	DBR	361	1,090	572	261	640	1,200	640
Inhalation Absorption Factor (unitless)	A	1.0	1.0	1.0	1.0	1.0	1.0	1.0
Exposure Frequency (unitless)[b]	EF	0.96	0.96	0.96	0.96	0.16	0.08	0.08
Conversion Factor (µg to mg, L to m3)	CF	1.00E-06	1.00E-06	1.00E-06	1.00E-06	1.00E-06	1.00E-06	1.00E-06
Age Sensitivity Factor (unitless)[c]	ASF	10	10	3	1	3	10	3
Exposure Duration (years)	ED	0.25	2	14	13.75	14	2	7
Averaging Time for Lifetime (years)[d]	AT	70	70	70	70	70	70	70
Fraction of Time at Home (unitless)[e]	FAH	0.85	0.85	0.72	0.73	n/a	1.0	1.0
Adjustment Factor (unitless)[f]	AF	n/a	n/a	n/a	n/a	1.0	n/a	n/a
Cancer Conversion Factor (unitless)[g]	CCF	1.00E+06	1.00E+06	1.00E+06	1.00E+06	1.00E+06	1.00E+06	1.00E+06
Cancer Potency Factor (mg/kg/day)-1	CPFh	1.1	1.1	1.1	1.1	1.1	1.1	1.1

[a] For residential, OEHHA Table 5.7, 95th percentile for 3rd Tri and 0<2, 80th percentile all other age groups. For park and school, OEHHA Table 5.8 95th percentile moderate activity for 0<2, 2<9, and 2<16.

[b] Residential exposure based on 350 days per year. School exposure duration based on 180 days per year and 8 hours per day. Park exposure based on 350 days per year and 2 hours per day. These receptor types used the same approach as the residential analysis, but adjustments to the exposure duration for ASch were necessary because residential analysis is based on daily exposure of 24 hours.

[c] OEHHA 2015, Table 8.3

[d] Averaging time is always 70 years, as defined by OEHHA, as this is the assumed average lifespan. Exposure duration (30 years for differs, 24 years for schools, 9 years for parks) differs for averaging time in that exposure duration defines a person's timeframe at a given location (at a specific home, at a specific school), whereas averaging time definitely a person's expected lifetime.

[e] FAH includes because no school receptors are within the 1 in a million isopleth. School and park analysis used the same approach as the residential analysis. A value of 1.0 is used for school and park uses.

[f] Adjustment factor not included because project sources operate 24 hours per day.

[g] Conversion factor used to convert cancer risk to chances per million.

Source: OEHHA 2015.

The FAH values for third trimester, infant, and child receptors in the HRA are incorrect. SCAQMD guidance states that for screening purposes, "the FAH is set to 1 for individuals from the third trimester to age 16, assuming children stay near home for school or daycare with no time discount."[18] Per SCAQMD guidance, the HRA Report should have followed this guidance and used an FAH of 1 for third trimester, infant, and child receptors. By using unsupported FAH values, the DEIR may underestimate the cancer risk to nearby sensitive receptors from Project operation.

Second, by failing to prepare a quantified construction HRA, the DEIR is inconsistent with CEQA's requirement to correlate the increase in emissions generated by the Project to the adverse impacts on human health caused by those emissions. Under CEQA, agencies must make a "reasonable effort to substantively connect a project's air quality impacts to likely health consequences."[19] The DEIR also fails to align with the CA DOJ guidelines for warehouse best practices, which recommends that all potential warehouse projects prepare a quantitative HRA in accordance with the Office of Environmental Health Hazard Assessment ("OEHHA"), the organization responsible for providing guidance on conducting HRAs in California.[20] To comply with these requirements, an HRA should have been prepared to assess the potential health risks to nearby sensitive receptors from DPM emissions generated during both construction and operation.

Third, while the DEIR includes an HRA evaluating the health risk impacts to nearby, existing receptors as a result of Project operation, the DEIR fails to evaluate the combined lifetime cancer risk to nearby receptors as a result of Project construction and operation together. This is incorrect and, as a result, the DEIR's evaluation cannot be relied upon to determine Project significance. According to OEHHA guidance, "the excess cancer risk is calculated separately for each age grouping and then summed to yield cancer risk at the receptor location."[21] The DEIR should

have quantified the Project's construction and operational health risks, as well as compared the combined construction and operational cancer risk to the SCAQMD threshold of 10 in one million.

[18] "Risk Assessment Procedures." SCAQMD, August 2017, *available at*: http://www.aqmd.gov/docs/defaultsource/rule-book/Proposed-Rules/1401/riskassessmentprocedures_2017_080717.pdf, p. 7.
[19] "Sierra Club v. County of Fresno." Supreme Court of California, December 2018, *available at*: https://law.justia.com/cases/california/supreme-court/2018/s219783a.html
[20] "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act." CA DOJ, *available at*: https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/warehouse-bestpractices.pdf, p. 6.
[21] "Guidance Manual for preparation of Health Risk Assessments." OEHHA, February 2015, *available at*: https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf p. 8-4.

Response 4-43

This comment states that the Draft EIR's operational HRA underestimates FAH values for third trimester, infant, and child receptors; the Draft EIR is inconsistent with CEQA's requirement to correlate the increase in emissions generated by the project to the adverse impacts on human health caused by those emissions; and the Draft EIR fails to evaluate the combined lifetime cancer risk to nearby receptors as a result of project construction and operation together. The FAH value used in the HRA is SCAQMD's recommended FAH value of one and was incorrectly shown in Table 3.2-9 of the Draft EIR. Table 3.2-9 of the Draft EIR has been updated to display the correct values used to model the HRA as shown in Chapter 3, "Revisions to the Draft EIR," of this Final EIR.

Comment 4-44

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. As demonstrated above, the Project would result in potentially significant air quality impact that should be mitigated further.

To reduce the VOC emissions associated with Project construction and operation, we recommend the DEIR consider incorporating the following mitigation measures:[22]

- Recycle leftover paint. Take any leftover paint to a hazardous waste center; do not mix leftover water-based and oil-based paints.
- Keep lids closed on all paint containers when not in use to prevent VOC emissions and excessive odors.
- For water-based paints, clean up with water only. Whenever possible, do not rinse the cleanup water down the drain or pour it directly into the ground or the storm drain
- Use compliant low-VOC cleaning solvents to clean paint application equipment.
- Keep all paint- and solvent-laden rags in sealed containers to prevent VOC emissions.
- Contractors shall construct/build with materials that do not require painting and use pre-painted construction materials to the extent practicable.
- Use high-pressure/low-volume paint applicators with a minimum transfer efficiency of at least 50 percent or other application techniques with equivalent or higher transfer efficiency.

The United States Environmental Protection Agency recommends conducting calculations for coverage area and thinning ratios prior to purchasing paints. By applying these calculations, the appropriate quantity of paint can be acquired, thereby helping to minimize waste and optimize resource use.[23]

To reduce construction VOC emissions, the California Department of Public Health ("CDPH") recommends the use of:[24]

- Natural materials such as solid wood products (e.g., hard wood flooring and wood paneling), natural stone (e.g., granite and marble), ceramic tile, and glass.

- Composite wood products that comply with the California Air Resources Board's ("CARB") Airborne Toxic Control Measure for formaldehyde.
- Interior paints, coatings, adhesives, and sealants that comply with South Coast AQMD Rule 1168 or CARB's Suggested Control Measure for Architectural Coatings.
- Flooring materials that are certified as low emitting under the CDPH Standard Method v1.2 or equivalent.
- Sealer on the surface of spray-on fireproofing to reduce adsorption of VOCs using a low-VOC sealer, if necessary.

An additional mitigation measure that may reduce the impact from operational ROG/VOC emissions is to implement a mechanical ventilation system meeting ASHRAE Standards 62.1 and 62.2. [25] HVAC systems should include MERV 13 or higher filters to reduce indoor pollutant exposure. Prior to occupancy, the building should undergo a flush-out period with HVAC systems operating at full capacity for at least 48 hours to remove residual VOCs and improve indoor air quality.

Provided above are several mitigation measures that would reduce Project-related VOC emissions. These measures offer a cost-effective, feasible way to incorporate lower-emitting design features into the proposed Project, which subsequently reduces emissions released during Project construction and operation.

A revised EIR should be prepared that includes all feasible mitigation measures, as well as an updated air quality analysis to ensure that the necessary mitigation measures are implemented to reduce emissions to the maximum extent feasible. The revised EIR should also demonstrate a commitment to the implementation of these measures prior to Project approval, to ensure that the Project's potentially significant emissions are reduced to the maximum extent possible.

[22] "Banning Commerce Center Project." Kimley-Horn and Associates, Inc., June 2024, *available at*: https://ceqanet.opr.ca.gov/2022090102/2; Draft Environmental Impact Report, p. 1-7.
[23] "Industrial Surface Coating." Emissions Inventory Improvement Program, September 1997, *available at*: https://www.epa.gov/sites/default/files/2015-08/documents/iii08.pdf, Volume III, Chapter 8, p. 8.3-1.
[24] "Reducing occupant exposure to volatile organic compounds (VOCs) from indoor sources: Guidelines for building occupants." California Department of Public Health, July 1996, *available at*: https://www.cdph.ca.gov/Programs/CCDPHP/DEODC/EHLB/IAQ/CDPH%20Document%20Library/reducing_occupant_exposure_vocs_guidelines_ADA.pdf.
[25] *Ibid.*, p. xii.

Response 4-44

This comment offers mitigation measures to further reduce emissions generated by the project and reduce air quality impacts. According to the commenter, these mitigation measures would reduce VOC emissions generated during project construction and operations and would include measures such as recycling leftover paint, keeping lids closed, using only water to clean up paint areas, using low-VOC cleaning solvents, building with materials that do not require painting, using high pressure/low-volume paint applicators, using natural materials, composite wood produces that comply with CARB's ATCM for formaldehyde, complying with SCAQMD Rule 1168, using flooring materials certified as low emitting, using sealer on the surface of spray-on fireproofing, and implementing a mechanical ventilation system meeting ASHRAE Standards. Implementation of Mitigation Measure 3.2-2a, would require the use of low-VOC paints during construction, which reduces the VOC impact during construction to less-than-significant levels. Therefore, no further mitigation is required to reduce construction air quality impacts. In terms of operations, there remains a significant VOC impact after mitigation, as VOC emissions remain in excess of thresholds. The remainder of VOC emissions are associated with consumer products (89 percent of VOC emissions after mitigation) and architectural coatings (11 percent of VOC emissions after mitigation). There are no feasible mitigation measures to reduce these VOC emission sources long-term. Moreover, the comment provides no evidence that any of the proposed measures would reduce VOC emissions associated with project operation. No changes to the Draft EIR are warranted in response to this comment.

Comment 4-45
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.

Response 4-45
As noted in Section 2.2, "Comments and Responses," above, the comment has been reproduced in its original form with no textual or color changes (i.e., the word "Disclaimer" in blue text is from the original comment). The comment provides a disclaimer for the commenter's analysis based on the information gleaned from the Draft EIR. The comment does not raise an issue with the adequacy of the Draft EIR. No further response is required.

Letter 5 California Department of Transportation (District 8)

Janki Patel, Branch Chief – Local Development Review
November 17, 2025

Comment 5-1

The California Department of Transportation (Caltrans) Local Development Review (LDR) Branch has completed its evaluation of the Draft EIR, Traffic Impact Study, dated September 2024, prepared for the City of Rancho Cucamonga by Fehrs and Peers.

Caltrans is committed to supporting a multimodal transportation system that serves local development projects. Planning for facilities that accommodate pedestrians, cyclists, transit riders, and car/vanpool users encourages more multimodal travel. This, in turn, helps reduce traffic congestion, vehicle miles traveled (VMT), greenhouse gas emissions, and the State's contribution to climate change.

The proposed project involves demolition and clearing of existing paved surfaces, followed by site grading, excavation, and construction of five two-story buildings totaling approximately 1,830,729 gross square feet of warehouse, distribution, and associated office uses. The project also includes the development and operation of loading docks for truck trailers, 968 passenger vehicle parking spaces, 444 truck trailer parking spaces, six new public streets, water quality basins, utility infrastructure improvements, and exterior lighting and signage.

Development of the site would result in approximately 44 acres of paved or other impervious surfaces and would provide landscaping on approximately 10 percent of the project site.

Based on the information provided in the Draft EIR and its associated documents, we are submitting the following comments and recommendations for your consideration:

Response 5-1

The comment states Caltrans' commitment to multimodal transportation and provides an understanding of the project description. The comment does not raise an issue with the adequacy of the Draft EIR. No further response is required.

Comment 5-2

Vehicle Miles Traveled (VMT) and Greenhouse Gas (GHG) Reduction

1. Project proponents are encouraged to coordinate with nearby planned bike networks to contribute to a larger active transportation network. The City shall consider establishing a VMT Mitigation Impact Fee program to help mitigate potential impacts on the State Highway System.
2. Future developments must also consider the traffic safety impacts on the State Highway System resulting from new pedestrian and bicyclist needs, particularly where new origins or destinations intersect a State Route. Additionally, the analysis should address multimodal conflict points and changes in traffic composition, such as an increase in bicyclists or pedestrians, especially in areas where features like shoulders or sidewalks may not exist or are inconsistent with the facility's design.
3. Caltrans recommends that the project implement multimodal strategies, such as those derived from Transit-Oriented Development (TOD), to further reduce the traffic-related impacts of future projects.
4. Active Transportation Plans and Smart Growth initiatives play a key role in supporting the state's 2050 Climate goals. Caltrans supports efforts to reduce Vehicle Miles Traveled (VMT)and Greenhouse Gas (GHG) emissions by promoting strategies that encourage greater use of, and benefits from, a multimodal transportation network.

Response 5-2

The comment suggests multiple VMT and GHG reduction strategies that could be applicable to projects proposed within the city. The City will take the suggestions listed in Comment 5-2 into consideration, and if deemed feasible, the City will coordinate with Caltrans as needed. These contributions would have indirect impacts on VMT in the region by supporting active transportation; however, they are not specific to the proposed project and have not been identified to mitigate project impacts on VMT. Therefore, the significance determination of Impact 3.13-2 would remain significant and unavoidable as identified in Section 3.13, "Transportation," of the Draft EIR. No changes to the Draft EIR are required in response to this comment.

Comment 5-3

Safety Reviews:

5. The proposed project will generate additional trips on the State Highway System. Please provide a Safety Analysis Report for the intersection of I-15 and Foothill Blvd. The Safety Analysis Report shall follow the attached guidance. See attached *Local Development Review (LDR) Safety Review Practitioners Guidance in February 2024*. Please follow the steps below:
    a) Please analyze the existing crash data and discuss the project's impact on safety as needed.
    b) To request crash data on the State Highway System, please submit your request via our California Public Records Act (CPRA) portal at mycusthelp.com.
    c) Please provide appropriate countermeasures to mitigate/ reduce project's safety impact if applicable.

Response 5-3

The comment requests a safety analysis due to project-generated trips at the intersection of I-15 and Foothill Boulevard. The Non-CEQA Level of Service (LOS) Report (Fehr & Peers 2024), provided as Appendix J of the Draft EIR, conducted an LOS analysis of key study intersections including the I-15 Southbound Ramps and Foothill Boulevard and I-15 Northbound Ramps and Foothill Boulevard intersections. The Cities of Rancho Cucamonga and Ontario have adopted LOS standards of LOS D or better and LOS E or better, respectively. It was determined that both I-15 (i.e., Northbound and Southbound ramps) and Foothill Boulevard intersections would remain at acceptable levels under all scenarios. Additionally, an off-ramp queuing analysis was performed for these intersections, and it was determined that the 95th percentile queue estimates would not be exceeded under all plus project scenarios. Therefore, the project's trip generation would be insufficient to substantially change transportation hazards at the I-15 ramps and Foothill Boulevard intersections. No changes to the Draft EIR are warranted in response to this comment.

Comment 5-4

Traffic Operations

6. Please include all traffic impacts from nearby pending projects that may affect your development in the complete TIS. Consult with the lead agency for the status and information on these projects.
7. Please also include the interchanges I-10/Milliken Ave in the Project study Area.
8. Please include queueing analysis for all State Highway study interchanges.
9. Please provide the Annual Average Daily Traffic (AADT) data for the study interchanges along the State Highway System.
10. Please provide recommended improvements at the interchange of I-15/ Foothill Rd for Future Year (2050).

Response 5-4

The comment requests traffic impact and queuing analyses. The Non-CEQA Level of Service (LOS) Report (Fehr & Peers 2024), included as Appendix J of the Draft EIR, is provided for the City's consideration of project merits to identify whether study intersections would meet the City of Rancho Cucamonga and City of Ontario LOS standards with the addition of the proposed project traffic. The LOS assessment is not used to determine environmental impacts under CEQA (in accordance with SB 743, Statutes of 2013) but may inform decisions about the merits of the proposed project. As discussed in the introduction to Section 3.13, "Transportation," and Subsection 3.13.2, Environmental Setting, of the Draft EIR, pursuant to Public Resources Code Section 21099, enacted as part of SB 743 (Stats. 2013, Ch. 386, Section 5), and Section 15064.3(a) of the State CEQA Guidelines, vehicle miles traveled (VMT) are generally the most appropriate measure of transportation impacts and "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment." The report was appended to the Draft EIR for informational purposes only.

The Non-CEQA LOS Report includes analysis scenarios for future year 2050 with and without the project, accounting for traffic from future developments. As detailed in the Non-CEQA LOS Report, study intersections were chosen in compliance with the City's guidelines which state that intersections that would result in more than 50 peak hour trips from project implementation must be included. Additional intersections that would not result in 50 or more peak hour trips were also included in the southeastern industrial quadrant to be conservative.

An off-ramp queuing analysis for the I-15/Foothill Boulevard, I-15/Fourth Street, and I-10/Etiwanda Avenue interchanges is included in Section 7 of the Non-CEQA LOS Report. As shown in Table 9 of the Non-CEQA LOS Report, it was determined that all ramps provide sufficient storage capacity without queueing traffic extending back to the freeway mainline.

According to the Non-CEQA LOS Report (Appendix J of the Draft EIR), the I-15 (Northbound and Southbound ramps) and Foothill Boulevard intersections would operate at level of service LOS C or better conditions under all scenarios, which meets the City LOS standard. Therefore, no improvements are recommended at the I-15 and Foothill Boulevard interchange. No changes to the Draft EIR are warranted in response to this comment.

Comment 5-5

Equitable Access

If any Caltrans facilities are impacted by the project, they must comply with 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.

Response 5-5

The comment provides that ADA Standards must be upheld if Caltrans facilities are impacted by the project and asserts that the project must provide access for bicyclists and pedestrians during construction. The project does not propose any physical changes to Caltrans facilities. As detailed in Draft EIR Section 3.13, "Transportation," Impact 3.13-3, construction activities within public right-of-way would be required to comply with City Municipal Code Chapter 12.03, which mandates adherence to the Standard Specifications for Public Works Construction (Green Book) and the California Manual on Uniform Traffic Control Devices (MUTCD) for maintaining access and implementing appropriate traffic-control measures for all modes of transportation, including bicycles and pedestrians. The project would obtain all necessary City permits, including construction/encroachment permits and, if needed, temporary street or lane closure permits. It was determined that with compliance with these requirements, project construction would not result in a substantial increase in transportation safety hazards. No changes to the Draft EIR are warranted in response to this comment.

Comment 5-6
Caltrans Encroachment Permit

Please be advised that any permanent work or temporary traffic control that encroaches onto Caltrans' Right-of-Way (ROW) requires a 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

Please be advised that LDR's point of contact role will conclude upon the completion of the development entitlement process. Once project is entitled, the Encroachment Permit Office will serve as the primary point of contact moving forward.

Response 5-6
The comment provides information regarding Caltrans' Right-of-Way requirements and does not comment on the adequacy of the Draft EIR. No further response is required.

Comment 5-7
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 909-925-7520.

Response 5-7
The comment provides contact information for Caltrans District 8 and does not comment on the adequacy of the Draft EIR. No further response is required.

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3 REVISIONS TO THE DRAFT EIR

This chapter presents specific text changes made to the Draft EIR since its publication and public review. The changes are presented in the order in which they appear in the original Draft EIR and are identified by the Draft EIR page number. The revised text is presented afterwards.

The information contained within this chapter clarifies and expands on information in the Draft EIR and does not constitute "significant new information" requiring recirculation. (See Public Resources Code Section 21092.1; CEQA Guidelines Section 15088.5.) "Significant new information," as defined in State CEQA Guidelines Section 15088.5(a), means information added to an EIR that changes the EIR so as to deprive the public of a meaningful opportunity to comment on a "substantial adverse environmental effect" or a "feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement." Therefore, the addition of these revisions do not trigger a recirculation of the Draft SEIR pursuant to Section 15088.5 of the CEQA Guidelines.

3.1 REVISIONS TO "EXECUTIVE SUMMARY"

Pages ES-19 and ES-20 have been revised to correct inconsistencies between Table ES-1 and the conclusions in Sections 3.9 and 4.3.9, "Hydrology and Water Quality." Specifically, Table ES-1 has been revised to remove the project-level and cumulative impact related to inundation-related pollutant release, consistent with the conclusion in Section 3.9 that the proposed project would not result in an increased risk of pollutant release due to inundation in a flood hazard, tsunami, or seiche zone. In addition, Impact 3.9-4 in Table ES-1 has been revised to accurately reflect the impact analyzed in Section 3.9 (i.e., conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan). The revisions are as follows:

Original:

Table ES-1 Summary of Impacts and Mitigation Measures

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
Hydrology and Water Quality			
Impact 3.9-4: Risk Release of Pollutants Due to Project Inundation in Flood Hazard, Tsunami, or Seiche Zones	LTS	No mitigation is required.	LTS
Cumulative Impact 4.3.9-1: Violate Water Quality Standards or Waste Discharge Requirements or Substantially Degrade Surface or Ground Water Quality	LTS	No mitigation is required.	LTS
Cumulative Impact 4.3.9-2: Substantially Decrease Groundwater Supplies or Interfere with Groundwater Recharge Such That the Project May Impede Sustainable Groundwater Management of the Basin	LTS	No mitigation is required.	LTS
Cumulative Impact 4.3.9-3: Substantially Alter Drainage Patterns of the Project Site in a Manner That Would Result in Substantial Erosion and Siltation, On- or Off-Site Flooding, an Exceedance of the Capacity of Stormwater Drainage Systems, Additional Sources of Polluted Runoff, or That Would Impede or Redirect Flood Flows	LTS	No mitigation is required.	LTS
Cumulative Impact 4.3.9-4: Risk Release of Pollutants Due to Project Inundation in Flood Hazard, Tsunami, or Seiche Zones	LTS	No mitigation is required.	LTS

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
Cumulative Impact 4.3.9-5: Conflict with or Obstruct Implementation of a Water Quality Control Plan or Sustainable Groundwater Management Plan	LTS	No mitigation is required.	LTS

Revised:

Table ES-1 Summary of Impacts and Mitigation Measures

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
Hydrology and Water Quality			
Impact 3.9-4: Conflict with or Obstruct implementation of a Water Quality Control Plan or Sustainable Groundwater Management Plan	LTS	No mitigation is required.	LTS
Cumulative Impact 4.3.9-1: Violate Water Quality Standards or Waste Discharge Requirements or Substantially Degrade Surface or Ground Water Quality	LTS	No mitigation is required.	LTS
Cumulative Impact 4.3.9-2: Substantially Decrease Groundwater Supplies or Interfere with Groundwater Recharge Such That the Project May Impede Sustainable Groundwater Management of the Basin	LTS	No mitigation is required.	LTS
Cumulative Impact 4.3.9-3: Substantially Alter Drainage Patterns of the Project Site in a Manner That Would Result in Substantial Erosion and Siltation, On- or Off-Site Flooding, an Exceedance of the Capacity of Stormwater Drainage Systems, Additional Sources of Polluted Runoff, or That Would Impede or Redirect Flood Flows	LTS	No mitigation is required.	LTS
Cumulative Impact 4.3.9-4: Conflict with or Obstruct Implementation of a Water Quality Control Plan or Sustainable Groundwater Management Plan	LTS	No mitigation is required.	LTS

Page ES-22 has been revised to correct inconsistencies between Table ES-1 and the conclusions in Section 4.3.11, "Noise." Specifically, Table ES-1 has been revised to correctly identify Cumulative Impacts 4.3.11-1, 4.3.11-4, and 4.3.11-5 as less than significant, consistent with the analysis and conclusions in Section 4.3.11. The impact numbering has also been revised for consistency. The revisions are as follows:

Original:

Table ES-1 Summary of Impacts and Mitigation Measures

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
Noise and Vibration			
Cumulative Impacts 4.3.11-1 (Cumulative Short-Term Construction Noise Impacts), 4.11-4 (Cumulative Exposure of Sensitive Receptors to Construction Vibration), and 4.11-5 (Cumulative Vibration Compatibility)	PS	Implement **Mitigation Measure 3.11-1.**	LTS

Revised:

Table ES-1 Summary of Impacts and Mitigation Measures

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
Noise and Vibration			
Cumulative Impacts 4.3.11-1 (Cumulative Short-Term Construction Noise Impacts), 4.3.11-4 (Cumulative Exposure of Sensitive Receptors to Construction Vibration), and 4.3.11-5 (Cumulative Vibration Compatibility)	LTS	No mitigation is required.	LTS

3.2 REVISIONS TO SECTION 3.2, "AIR QUALITY"

In response to comments on the Draft EIR, Tables 3.2-11 and 3.2-13 on pages 3.2-28 and 3.2-31 of the Draft EIR are revised as follows to update the CalEEMod modeling results as they relate to the cleanup and remediation activities:

Original:

Table 3.2-11 Estimated Unmitigated Construction Emissions (Mass Regional Pounds Per Day)

Construction Phase	VOC	NO_X	CO	PM_{10}	$PM_{2.5}$	SO_2
Year 2026						
Demolition	<1	5	19	18	3	<1
Grading	1	10	39	4	2	<1
Building Construction	2	4	36	4	1	<1
Concrete Imports	<1	1	1	<1	<1	<1
Maximum Daily 2026[1]	**2**	**10**	**39**	**18**	**3**	**<1**
Year 2027						
Building Construction	2	4	35	4	1	<1
Paving	<1	2	12	<1	<1	<1
Architectural Coating	310	2	21	4	1	<1
Maximum Daily 2027	**310**	**4**	**35**	**4**	**1**	**<1**
SCAQMD Regional Construction Threshold	**75**	**100**	**550**	**150**	**55**	**150**
Exceeds Threshold?	**Yes**	**No**	**No**	**No**	**No**	**No**

Notes: VOC = volatile organic gases; NOx = oxides of nitrogen; CO = carbon monoxide; $PM_{2.5}$ = fine particulate matter; PM_{10} = respirable particulate matter; SO_2 = sulfur dioxide.

[1] 2026 Maximum Emissions occur when demolition, grading, and cleanup and remediation truck trips overlap.

Source: Modeled by Ascent in 2025.

Table 3.2-13 Estimated Mitigated Construction Emissions (Mass Regional Pounds Per Day)

Construction Phase	VOC	NO_X	CO	PM_{10}	$PM_{2.5}$	SO_2
Year 2026						
Demolition	<1	5	19	18	3	<1
Grading	1	10	39	4	2	<1
Building Construction	2	4	36	4	1	<1
Concrete Imports	<1	1	1	<1	<1	<1
Maximum Daily 2026[1]	**2**	**10**	**39**	**18**	**3**	**<1**
Year 2027						

Construction Phase	VOC	NO_X	CO	PM_{10}	$PM_{2.5}$	SO_2
Building Construction	2	4	35	4	1	<1
Paving	<1	2	12	<1	<1	<1
Architectural Coating	31	2	21	4	1	<1
Maximum Daily 2027	**31**	**4**	**35**	**4**	**1**	**<1**
SCAQMD Regional Construction Threshold	**75**	**100**	**550**	**150**	**55**	**150**
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Notes: VOC = volatile organic gases; NO_X = oxides of nitrogen; CO = carbon monoxide; $PM_{2.5}$ = fine particulate matter; PM_{10} = respirable particulate matter; SO_2 = sulfur dioxide.

[1] 2026 Maximum Emissions occur when demolition, grading, and cleanup and remediation truck trips overlap.

Source: Modeled by Ascent in 2025.

Revised:

Table 3.2-11 Estimated Unmitigated Construction Emissions (Mass Regional Pounds Per Day)

Construction Phase	VOC	NO_X	CO	PM_{10}	$PM_{2.5}$	SO_2
Year 2026						
Demolition	<1	5	19	18	3	<1
Grading	1	10	39	4	2	<1
Cleanup and Remediation Truck Trips	<1	7	4	2	1	<1
Building Construction	2	4	36	4	1	<1
Concrete Imports	<1	1	1	<1	<1	<1
Maximum Daily 2026[1]	**2**	**22**	**62**	**24**	**5**	**<1**
Year 2027						
Building Construction	2	4	35	4	1	<1
Paving	<1	2	12	<1	<1	<1
Architectural Coating	310	2	21	4	1	<1
Maximum Daily 2027	**310**	**4**	**35**	**4**	**1**	**<1**
SCAQMD Regional Construction Threshold	**75**	**100**	**550**	**150**	**55**	**150**
Exceeds Threshold?	**Yes**	**No**	**No**	**No**	**No**	**No**

Notes: VOC = volatile organic gases; NOx = oxides of nitrogen; CO = carbon monoxide; $PM_{2.5}$ = fine particulate matter; PM_{10} = respirable particulate matter; SO_2 = sulfur dioxide.

[1] 2026 Maximum Emissions occur when demolition, grading, and cleanup and remediation truck trips overlap.

Source: Modeled by Ascent in 2025.

Table 3.2-13 Estimated Mitigated Construction Emissions (Mass Regional Pounds Per Day)

Construction Phase	VOC	NO_X	CO	PM_{10}	$PM_{2.5}$	SO_2
Year 2026						
Demolition	<1	5	19	18	3	<1
Grading	1	10	39	4	2	<1
Cleanup and Remediation Truck Trips	<1	7	4	2	1	<1
Building Construction	2	4	36	4	1	<1
Concrete Imports	<1	1	1	<1	<1	<1
Maximum Daily 2026[1]	**2**	**22**	**62**	**24**	**5**	**<1**

Construction Phase	VOC	NO_X	CO	PM_{10}	$PM_{2.5}$	SO_2
Year 2027						
Building Construction	2	4	35	4	1	<1
Paving	<1	2	12	<1	<1	<1
Architectural Coating	31	2	21	4	1	<1
Maximum Daily 2027	**31**	**4**	**35**	**4**	**1**	**<1**
SCAQMD Regional Construction Threshold	**75**	**100**	**550**	**150**	**55**	**150**
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Notes: VOC = volatile organic gases; NO_X = oxides of nitrogen; CO = carbon monoxide; $PM_{2.5}$ = fine particulate matter; PM_{10} = respirable particulate matter; SO_2 = sulfur dioxide.

[1] 2026 Maximum Emissions occur when demolition, grading, and cleanup and remediation truck trips overlap.

Source: Modeled by Ascent in 2025.

In response to comments on the Draft EIR, Table 3.2-9 on page 3.2-23 of the Draft EIR is revised as follows to clarify the "Fraction of Time at Home" values for the health risk assessment modeling:

Original:

Table 3.2-9 Cancer Risk Exposure Factors by Age Group and By Receptor Type

Parameter	Abbr.	Residential				School	Park	
		3rd Trimester	0<2	2<16	16>30	2<16	0<2	2<16
Daily Breathing Rate (mg/kg/day)[a]	DBR	361	1,090	572	261	640	1,200	640
Inhalation Absorption Factor (unitless)	A	1.0	1.0	1.0	1.0	1.0	1.0	1.0
Exposure Frequency (unitless)[b]	EF	0.96	0.96	0.96	0.96	0.16	0.08	0.08
Conversion Factor (µg to mg, L to m^3)	CF	1.00E-06	1.00E-06	1.00E-06	1.00E-06	1.00E-06	1.00E-06	1.00E-06
Age Sensitivity Factor (unitless)[c]	ASF	10	10	3	1	3	10	3
Exposure Duration (years)	ED	0.25	2	14	13.75	14	2	7
Averaging Time for Lifetime (years)[d]	AT	70	70	70	70	70	70	70
Fraction of Time at Home (unitless)[e]	FAH	0.85	0.85	0.72	0.73	n/a	1.0	1.0
Adjustment Factor (unitless)[f]	AF	n/a	n/a	n/a	n/a	1.0	n/a	n/a
Cancer Conversion Factor (unitless)[g]	CCF	1.00E+06	1.00E+06	1.00E+06	1.00E+06	1.00E+06	1.00E+06	1.00E+06
Cancer Potency Factor (mg/kg/day)-1	CPFh	1.1	1.1	1.1	1.1	1.1	1.1	1.1

[a] For residential, OEHHA Table 5.7, 95th percentile for 3rd Tri and 0<2, 80th percentile all other age groups. For park and school, OEHHA Table 5.8, 95th percentile, moderate activity for 0<2, 2<9, and 2<16.

[b] Residential exposure based on 350 days per year. School exposure duration based on 180 days per year and 8 hours per day. Park exposure based on 350 days per year and 2 hours per day. These receptor types used the same approach as the residential analysis, but adjustments to the exposure duration for each were necessary because residential analysis is based on daily exposure of 24 hours.

[c] OEHHA 2015, Table 8.3.

[d] Averaging time is always 70 years, as defined by OEHHA, as this is the assumed average lifespan. Exposure duration (30 years for differs, 24 years for schools, 9 years for parks) differs for averaging time in that exposure duration defines a person's timeframe at a given location (at a specific home, at a specific school), whereas averaging time definitely a person's expected lifetime.

[e] FAH includes because no school receptors are within the 1 in a million isopleth. School and park analysis used the same approach as the residential analysis. A value of 1.0 is used for school and park uses.

[f] Adjustment factor not included because project sources operate 24 hours per day.

[g] Conversion factor used to convert cancer risk to chances per million.

Source: OEHHA 2015.

Revised:

Table 3.2-9 Cancer Risk Exposure Factors by Age Group and By Receptor Type

Parameter	Abbr.	Residential				School	Park	
		3rd Trimester	0<2	2<16	16>30	2<16	0<2	2<16
Daily Breathing Rate (mg/kg/day)[a]	DBR	361	1,090	572	261	640	1,200	640
Inhalation Absorption Factor (unitless)	A	1.0	1.0	1.0	1.0	1.0	1.0	1.0
Exposure Frequency (unitless)[b]	EF	0.96	0.96	0.96	0.96	0.16	0.08	0.08
Conversion Factor (µg to mg, L to m^3)	CF	1.00E-06	1.00E-06	1.00E-06	1.00E-06	1.00E-06	1.00E-06	1.00E-06
Age Sensitivity Factor (unitless)[c]	ASF	10	10	3	1	3	10	3
Exposure Duration (years)	ED	0.25	2	14	13.75	14	2	7
Averaging Time for Lifetime (years)[d]	AT	70	70	70	70	70	70	70
Fraction of Time at Home (unitless)[e]	FAH	1.0	1.0	1.0	1.0	n/a	1.0	1.0
Adjustment Factor (unitless)[f]	AF	n/a	n/a	n/a	n/a	1.0	n/a	n/a
Cancer Conversion Factor (unitless)[g]	CCF	1.00E+06	1.00E+06	1.00E+06	1.00E+06	1.00E+06	1.00E+06	1.00E+06
Cancer Potency Factor (mg/kg/day)-1	CPFh	1.1	1.1	1.1	1.1	1.1	1.1	1.1

[a] For residential, OEHHA Table 5.7, 95th percentile for 3rd Tri and 0<2, 80th percentile all other age groups. For park and school, OEHHA Table 5.8, 95th percentile, moderate activity for 0<2, 2<9, and 2<16.

[b] Residential exposure based on 350 days per year. School exposure duration based on 180 days per year and 8 hours per day. Park exposure based on 350 days per year and 2 hours per day. These receptor types used the same approach as the residential analysis, but adjustments to the exposure duration for each were necessary because residential analysis is based on daily exposure of 24 hours.

[c] OEHHA 2015, Table 8.3.

[d] Averaging time is always 70 years, as defined by OEHHA, as this is the assumed average lifespan. Exposure duration (30 years for differs, 24 years for schools, 9 years for parks) differs for averaging time in that exposure duration defines a person's timeframe at a given location (at a specific home, at a specific school), whereas averaging time definitely a person's expected lifetime.

[e] FAH includes because no school receptors are within the 1 in a million isopleth. School and park analysis used the same approach as the residential analysis. A value of 1.0 is used for school and park uses.

[f] Adjustment factor not included because project sources operate 24 hours per day.

[g] Conversion factor used to convert cancer risk to chances per million.

Source: OEHHA 2015.

3.3 REVISIONS TO SECTION 3.5, "ENERGY"

In response to comments on the Draft EIR, Table 3.5-1 on page 3.5-8 of the Draft EIR is revised to reflect the updates to the CalEEMod modeling to include a more robust assessment of the cleanup and remediation activities and the additional construction modeling of the parking lot, as follows:

Original:

Table 3.5-1 Estimated Construction-Related Energy Consumption

Fuel Type	Diesel (Gallons)
Diesel	57,354
Gasoline	75,616

Notes: Gasoline gallons include on-road gallons from worker trips. Diesel gallons include off-road equipment and on-road gallons from trucks.

Source: Modeled by Ascent in 2025.

Revised:

Table 3.5-1 Estimated Construction-Related Energy Consumption

Fuel Type	Diesel (Gallons)
Diesel	71,577
Gasoline	76,160

Notes: Gasoline gallons include on-road gallons from worker trips. Diesel gallons include off-road equipment and on-road gallons from trucks.

Source: Modeled by Ascent in 2025.

3.4 REVISIONS TO SECTION 3.7, "GREENHOUSE GASES"

In response to comments on the Draft EIR, Table 3.7-3 on page 3.5-8 of the Draft EIR to reflect the changes to modeling such as the addition of the cleanup and remediation activities and additional construction modeling of the parking lot, as follows:

Original:

Table 3.7-3 Project-Generated Greenhouse Gas Emissions from Construction and Operations

Emissions Source	$MTCO_2e$
Construction GHG Emissions	
Total ($MTCO_2e$)	1,222
Amortized ($MTCO_2e$/year)	42
Operational GHG Emissions ($MTCO_2e$/year)	
Area Sources	37
Energy Consumption	4,242
Water Consumption and Wastewater Generation	1,410
Solid Waste Generation	537
Refrigerants	383
Medium Duty Trucks	1,455
Heavy Duty Trucks	8,343
Workers	4,999
Yard Trucks	336
TRUs	2,170
Forklifts	4,028
Total Operational GHG Emissions	**27,939**
Total Project Annual GHG Emissions (Amortized Construction + Operational)	**27,981**

Notes: Notes: Totals may not add due to independent rounding. $MTCO_2e$ = metric tons of carbon dioxide equivalent; GHG = greenhouse gas

Source: Modeled by Ascent in 2025.

Revised:

Table 3.7-3 Project-Generated Greenhouse Gas Emissions from Construction and Operations

Emissions Source	$MTCO_2e$
Construction GHG Emissions	
Total ($MTCO_2e$)	1,399
Amortized ($MTCO_2e$/year)	47
Operational GHG Emissions ($MTCO_2e$/year)	
Area Sources	37
Energy Consumption	4,242
Water Consumption and Wastewater Generation	1,410
Solid Waste Generation	537
Refrigerants	383
Medium Duty Trucks	1,455
Heavy Duty Trucks	8,343
Workers	4,999
Yard Trucks	336
TRUs	2,170
Forklifts	4,028
Total Operational GHG Emissions	**27,939**
Total Project Annual GHG Emissions (Amortized Construction + Operational)	**27,986**

Notes: Notes: Totals may not add due to independent rounding. $MTCO_2e$ = metric tons of carbon dioxide equivalent; GHG = greenhouse gas

Source: Modeled by Ascent in 2025.

3.5 REVISIONS TO SECTION 3.13, "TRANSPORTATION"

In response to comments on the Draft EIR, the following text on page 3.13-16 of the Draft EIR is revised as follows to clarify the VMT analysis methodology:

Original:

Project Effect on VMT

The boundary method was used to estimate the project's effect on VMT within the surrounding area by summing all weekday VMT on the roadway network within a designated boundary. Boundary method VMT estimates VMT by multiplying the number of trips on each roadway segment by the length of that segment. This approach includes all trips, including those trips that do not begin or end in the designated boundary. This is the only VMT method that captures the effect of cut-through and/or displaced travel. Unlike the analysis of project-generated VMT, the project effect on VMT analysis includes truck trips.

The City's TIA guidelines state that the City boundary should be used for boundary VMT analysis unless the project is located near the city limit. Because the proposed project is located near the southern City limit, the project effect on VMT analysis used a 30-mile radius from the project site. The 30-mile boundary was selected to capture the area that project trips could affect the transportation network by estimating the average project trip length, 15 miles, and doubling it.

The City's TIA Guidelines also state that a project would result in a significant impact if the following condition is met:

- The cumulative link-level boundary VMT per service population within City of Rancho Cucamonga increases under the plus project condition compared to the no project condition.

At a 30-mile boundary, the threshold of significance used for the project's effect on VMT is 24.01 VMT per service population, which is the total VMT in the 30-mile boundary divided by the service population in that area under PlanRC buildout conditions. Additionally, the City's guidelines identify that, for the project effect assessment, if a project is consistent with the RTP/SCS, then the cumulative impacts shall be considered less than significant subject to consideration of other substantial evidence. The proposed project was determined to not be consistent with the RTP/SCS; therefore, the proposed project effect on VMT was evaluated. For details regarding the RTP/SCS consistency evaluation for the proposed project, see Appendix I.

In response to comments on the Draft EIR, the following text on page 3.13-18 of the Draft EIR is revised as follows to clarify the project applicant's participation in the City's transportation DIF program, including for the construction of the grade separation project at Etiwanda Avenue and SCRRA railroad crossing:

Roadway Improvements

As stated above, the proposed project would involve the construction of six new public streets to provide access and accommodate internal circulation through the project site. All roadways would be designed in accordance with City design standards as established in the RCMC. Furthermore, the construction of new public street F would partially achieve a roadway connection envisioned in PlanRC, which considered the extension of Whittram Avenue from Etiwanda Avenue to Rochester Avenue and under the I-15 to provide better access to the Southeast Industrial Area (City of Rancho Cucamonga 2021a: Figure M-8). Therefore, the proposed project would not conflict with any planned or programmed roadway improvements in the vicinity of the project site.

Revised:

Project Effect on VMT

The boundary method was used to estimate the project's effect on VMT within the surrounding area by summing all weekday VMT on the roadway network within a designated boundary. Boundary method VMT estimates VMT by multiplying the number of trips on each roadway segment by the length of that segment. This approach includes all trips, including those trips that do not begin or end in the designated boundary. This is the only VMT method that captures the effect of cut-through and/or displaced travel. Unlike the analysis of project-generated VMT, the project effect on VMT analysis includes truck trips.

The City's TIA guidelines state that the City boundary should be used for boundary VMT analysis unless the project is located near the city limit. Because the proposed project is located near the southern City limit, the project effect on VMT analysis used a 30-mile radius from the project site. The 30-mile boundary was selected to capture the area that project trips could affect the transportation network by estimating the average project trip length, 15 miles, and doubling it.

The City's TIA Guidelines also state that a project would result in a significant impact if the following condition is met:

- The cumulative link-level boundary VMT per service population within City of Rancho Cucamonga increases under the plus project condition compared to the no project condition.

At a 30-mile boundary, the threshold of significance used for the project's effect on VMT is 24.01 VMT per service population, which is the total VMT in the 30-mile boundary divided by the service population in that area under PlanRC buildout conditions. Additionally, the City's guidelines identify that, for the project effect assessment, if a project is consistent with the RTP/SCS, then the cumulative impacts shall be considered less than significant subject to consideration of other substantial evidence. Based on the methodology established for the assessment of VMT and the San Bernardino Transportation Analysis Model (SBTAM+), the proposed project was determined to not be consistent with the RTP/SCS; therefore, the proposed project effect on VMT was evaluated. For details regarding the RTP/SCS consistency evaluation for the proposed project, see Appendix I.

In response to comments on the Draft EIR, the following text on page 3.13-18 of the Draft EIR is revised as follows to clarify the project applicant's participation in the City's transportation DIF program, including for the construction of the grade separation project at Etiwanda Avenue and SCRRA railroad crossing:

Roadway Improvements

As stated above, the proposed project would involve the construction of six new public streets to provide access and accommodate internal circulation through the project site. All roadways would be designed in accordance with City design standards as established in the RCMC. Furthermore, the construction of new public street F would partially achieve a roadway connection envisioned in PlanRC, which considered the extension of Whittram Avenue from Etiwanda Avenue to Rochester Avenue and under the I-15 to provide better access to the Southeast Industrial Area (City of Rancho Cucamonga 2021a: Figure M-8). As part of the project entitlement process, the project applicant would be required to pay its fair share contribution to the City's transportation DIF program, which would provide funding for roadway improvement projects, such as the construction of the grade separation project at Etiwanda Avenue and SCRRA railroad crossing, on roads that may have increased vehicle activity as a result of implementation of the proposed project. Therefore, the proposed project would not conflict with any planned or programmed roadway improvements in the vicinity of the project site.

3.6 REVISIONS TO CHAPTER 4, "CUMULATIVE IMPACTS"

Page 3.9-11 in Section 3.,9, "Hydrology and Water Quality," of the Draft EIR states that the proposed project would not result in an increased risk of pollutant release due to project inundation in a flood hazard, tsunami, or seiche zone. The Draft EIR concluded that no project-level impact would occur related to this issue; therefore, the issue was not discussed further.

CEQA Guidelines Section 15130(a) states that an EIR shall discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable. Because no project-level impact was identified, the project would not result in an incremental contribution to a cumulative impact with respect to inundation-related pollutant release. Accordingly, the cumulative impact analysis for this issue on pages 4-22 and 4-23 of the Draft EIR is not required and has been removed, as follows:

Original:

Cumulative Impact 4.3.9-4: Risk Release of Pollutants Due to Project Inundation in Flood Hazard, Tsunami, or Seiche Zones

The geographic scope for the evaluation of cumulative impacts related to increased risks of release of pollutants due to project inundation from flood hazards, tsunami, or seiche tends to be site specific as the potential for the risk of release of pollutants from flooding inundation is based on a project's location and proximity to flood-causing sources. A significant cumulative impact related to the risk of release of pollutants due to inundation could occur if cumulative projects within the same inundation area(s) as the proposed project would increase the risk of releasing pollutants.

As shown in the Rancho Cucamonga General Plan, the project site is located within an area of the city with no identified flooding hazards; as such, cumulative projects in proximity to the project site would have a low risk for flooding hazards. Therefore, development of these cumulative projects in combination with the proposed project would not increase the risk of release of pollutants due to inundation. For this reason, cumulative effects related to increased risks of release of pollutants due to project inundation are considered less than significant within the cumulative study area.

Similarly, the potential for project site inundation due to a flood, failure of a levee or dam, seiche, or tsunami is considered low; therefore, the potential for the proposed project to risk release of pollutants due to inundation is low. The proposed project would involve the routine use of potentially hazardous materials during construction, landscaping, and maintenance activities. In addition, project construction would involve

ground disturbance in areas with known soil contamination. In the unlikely event of project site inundation, project activities could result in the release of contaminants into the environment in the absence of protective or avoidance measures. However, compliance with existing laws, regulations, policies, and procedures would require best practices for the handling of hazardous materials, management of on-site soils, additional soil sampling, and remedial activities for site contamination, which would minimize the potential for a release and provide for prompt and effective cleanup if an accidental release occurs. Therefore, the proposed project would not risk the release of pollutants due to project inundation in flood hazard, tsunami, or seiche zones. For these reasons, the project's incremental contribution to the less-than-significant cumulative effects related to increased risks of release of pollutants due to project inundation would not be cumulatively considerable.

Cumulative Impact 4.3.9-5: Conflict with or Obstruct implementation of a Water Quality Control Plan or Sustainable Groundwater Management Plan

Revised:

Cumulative Impact 4.3.9-4: Conflict with or Obstruct implementation of a Water Quality Control Plan or Sustainable Groundwater Management Plan

Page 4-25 has been revised as follows to correct a typographical error in the numbering of cumulative impacts for consistency purposes:

Original:

Cumulative Impacts 4.3.11-1 (Cumulative Short-Term Construction Noise Impacts), 4.11-4 (Cumulative Exposure of Sensitive Receptors to Construction Vibration), and 4.11-5 (Cumulative Vibration Compatibility)

Revised:

Cumulative Impacts 4.3.11-1 (Cumulative Short-Term Construction Noise Impacts), 4.3.11-4 (Cumulative Exposure of Sensitive Receptors to Construction Vibration), and 4.3.11-5 (Cumulative Vibration Compatibility)

3.7 REVISIONS TO CHAPTER 6, "OTHER CEQA CONSIDERATIONS"

In response to comments on the Draft EIR, the following text on pages 6-2 to 6-3 of the Draft EIR is revised as follows to clarify how the proposed project aligns with the employment projections of the City's General Plan:

Original:

Economic Growth

A project could indirectly induce growth at the local level by increasing the demand for additional goods and services associated with an increase in population or employment and thus reducing or removing the barriers to growth. This typically occurs in suburban or rural environments where population or employment growth results in increased demand for service and commodity markets responding to the new population of residents or employees. As discussed throughout this EIR, the proposed project would constitute urban infill redevelopment on a site identified for such use in the City's General Plan and Zoning Ordinance. Therefore, implementation of the project would not indirectly increase population growth within a suburban or rural environment due to increased economic growth.

However, implementation of the proposed project would likely generate economic growth within the City as an 1,830,729 square-foot (SF) industrial facility, which is assumed to be a mix of high-cube fulfillment center (non-sorting; 1,353,089 SF), general warehouse (208,167 SF), high-cube cold storage warehouse (173,473 SF), and office (96,000 SF). The project would generate employment during the construction and operational phases of the project. Construction of the proposed project would draw temporary construction workers from the existing regional workforce, where construction employment would end onsite once the project has been fully constructed. Therefore, while construction of the proposed project would generate jobs and economic growth, this growth would be temporary in nature and would cease once construction is completed.

As discussed in Chapter 2, "Project Description," the proposed project is anticipated to accommodate approximately 1,408 employees daily. According to the City's General Plan, approximately 35,000 new jobs are anticipated to be created within the City through the 20-year planning horizon, or roughly through 2040 (City of Rancho Cucamonga 2021a).

When considering the number of new jobs associated with the proposed project, it would account for 5 percent of the City's projected job growth City over the next 20 years.

In addition, while the project would create economic opportunities by introducing new job opportunities to the project site, it is anticipated that the employment base for the operational phase of the project would come from the existing population within the City and surrounding area. As such, because it is anticipated that most of the future employees of the proposed project would already be living in the City or in nearby areas, introduction of new employment opportunities by the proposed project on the project site would not induce substantial unplanned growth in the area. For this reason, direct economic growth associated with implementation of the proposed project would be aligned with the City's General Plan and would not result in significant long-term physical environmental effects.

In addition, operation of the proposed project would support the purchase of goods and services within the City and throughout the region. Any secondary increase in employment associated with meeting these goods and services needs would be marginal, accommodated by existing goods and service providers, and highly unlikely to result in any new physical impacts to the environment. The proposed project would not be expected to induce substantial economic expansion to the extent that direct physical environmental effects would result. Moreover, the environmental effects associated with any future development in or around the City associated with future economic growth would be addressed as part of the CEQA environmental review for such development projects. Therefore, while the project would create economic opportunities by introducing new job opportunities to the project site, this change would not induce substantial new growth in the region. Therefore, indirect economic growth associated with implementation of the proposed project would not result in significant long-term physical environmental effects.

Revised:

Economic Growth

A project could indirectly induce growth at the local level by increasing the demand for additional goods and services associated with an increase in population or employment and thus reducing or removing the barriers to growth. This typically occurs in suburban or rural environments where population or employment growth results in increased demand for service and commodity markets responding to the new population of residents or employees. As discussed throughout this EIR, the proposed project would constitute urban infill redevelopment on a site identified for such use in the City's General Plan and Zoning Ordinance. Therefore, implementation of the project would not indirectly increase population growth within a suburban or rural environment due to increased economic growth.

However, implementation of the proposed project would likely generate economic growth within the City as an 1,830,729 square-foot (SF) industrial facility, which is assumed to be a mix of high-cube fulfillment center (non-sorting; 1,353,089 SF), general warehouse (208,167 SF), high-cube cold storage warehouse (173,473 SF), and office (96,000 SF). The project would generate employment during the construction and operational phases of the project. Construction of the proposed project would draw temporary construction workers from the existing regional workforce, where construction employment would end onsite once the project has been fully constructed. Therefore, while construction of the proposed project would generate jobs and economic growth, this growth would be temporary in nature and would cease once construction is completed.

As discussed in Chapter 2, "Project Description," the proposed project is anticipated to accommodate approximately 1,408 employees daily based on the conservative assumption of 1 employee per 1,300 sf of building space. According to the City's General Plan, approximately 21,657 new jobs are anticipated to be created within the City through the 20-year planning horizon, or roughly through 2040 (City of Rancho Cucamonga 2021a). Of the 21,657 jobs, approximately 5,122 jobs would be created in the industrial/flex sector 9,733 jobs would be created in the office sector, and 6,800 jobs would be created in the retail/commercial sector (City of Rancho Cucamonga 2021a: Table 1-1). As detailed in Appendix 5.14-1, "Growth Assumptions Memorandum," of the General Plan EIR, the majority of the 5,122 industrial/flex jobs were primarily identified for the Southeast Industrial Area, where the project site is located.

When considering the total number of employees estimated for the proposed project, it would account for ~~5~~7 percent of the City's total projected ~~job~~ employment growth and for approximately 27 percent of the projected industrial jobs in the Remainder of the City over the next 20 years. While the proposed project does constitute a large portion of the anticipated industrial employment growth for the Remainder of the City, the General Plan identified the Southeast Industrial Area for intensified industrial development. It is important to note that growth assumptions are the City's best estimate at a specific time and the growth projections assumptions were based on data collected in 2021 during the COVID-19 pandemic, which are not considered to be business-as-usual years. As shown by the cumulative industrial projects approved in the city, the amount of industrial employment growth is outpacing that projected by the General Plan but is providing jobs aligned with the total employment growth projected for the city through 2040. The City has recognized this increased growth in the industrial sector and further supported this growth by adopting an ordinance to create the Large Warehouse Overlay Zone (Section 17.38.080 of the RCMC) on November 2, 2022. The purpose of the Large Warehouse Overlay Zone (LW) is to ensure that large industrial buildings of 450,000 square feet or more are located in areas of the city with adequate public services and infrastructure and are away from sensitive receptors who may be impacted by air pollutant emissions, noise, and other impacts generated by the predominant uses in such buildings. As a Zoning Map Amendment pursuant to Section 17.38.080 (Large Warehouse Overlay Zone) of the RCMC is applicable to the proposed project, the City's Planning Department has reviewed and concurred that an intensification of industrial uses is appropriate for the project site and can be supported by existing public services and utilities.

Furthermore, it should be noted that at the time of the preparation of the General Plan, the project site was developed with existing industrial operations, which were accounted in the baseline employment projections. As described in Chapter 2, "Project Description,' of the Draft EIR, the previous industrial operation had ceased in late 2021 and was demolished in 2023; therefore, this industrial operation was not considered in the baseline of this Draft EIR. For this reason, some of the 1,408 employee projected for the proposed project would backfill the existing employees accounted in the baseline of the General Plan employment growth projections.

As such, the proposed project would be aligned with the total employment growth projected by the General Plan and would be consistent with the industrial/flex employment growth for the Remainder of the City. However, when considering other industrial projects that have been approved in the industrial/flex sector since adoption of the City's General Plan, the addition of the proposed project's employment growth may exceed the projections for the Remainder of the City. While the proposed project could cause industrial/flex employment to exceed projections for the Remainder of the City, this exceedance would not result in new or additional environmental impacts than those disclosed in the General Plan EIR as the General Plan had

accounted for 21,657 new jobs in the city through 2040 and individual development projects would be required under City regulations and CEQA to contribute their fair share of development impact fees to ensure infrastructure and public services are developed in time with this planned employment growth.

In addition, while the project would create economic opportunities by introducing new job opportunities to the project site, it is anticipated that the employment base for the operational phase of the project would come from the existing population within the City and surrounding area. As such, because it is anticipated that most of the future employees of the proposed project would already be living in the City or in nearby areas, introduction of new employment opportunities by the proposed project on the project site would not induce substantial unplanned growth in the area. For this reason, direct economic growth associated with implementation of the proposed project would be aligned with the City's General Plan and would not result in significant long-term physical environmental effects.

In addition, operation of the proposed project would support the purchase of goods and services within the City and throughout the region. Any secondary increase in employment associated with meeting these goods and services needs would be marginal, accommodated by existing goods and service providers, and highly unlikely to result in any new physical impacts to the environment. The proposed project would not be expected to induce substantial economic expansion to the extent that direct physical environmental effects would result. Moreover, the environmental effects associated with any future development in or around the City associated with future economic growth would be addressed as part of the CEQA environmental review for such development projects. Therefore, while the project would create economic opportunities by introducing new job opportunities to the project site, this change would not induce substantial new growth in the region. Therefore, indirect economic growth associated with implementation of the proposed project would not result in significant long-term physical environmental effects.

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5 LIST OF PREPARERS

LEAD AGENCY

City of Rancho Cucamonga

Christine Delostrinos ..... Senior Planner

Kirt Coury ..... Civic Solutions – Consultant

PREPARERS OF THE ENVIRONMENTAL DOCUMENT

Ascent

Chad Beckstrom, AICP ..... Principal

Marlie Long ..... Project Manager

Nicole Greenfield ..... Senior Environmental Planner

Matt McFalls ..... Senior Reviewer, Air Quality and Greenhouse Gas Emissions

Peter Hoholick ..... Air Quality and Greenhouse Gas Emissions

Gayiety Lane ..... Publications

Tracy Prybyla ..... Publications

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