ONTARIO INTERNATIONAL AIRPORT

SOUTH AIRPORT CARGO CENTER PROJECT

FINAL ENVIRONMENTAL IMPACT REPORT

SCH No. 2021100226

PREPARED FOR:

ONTARIO INTERNATIONAL AIRPORT

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1.0 INTRODUCTION

1.1 INTRODUCTION TO THE FINAL EIR

The Final Environmental Impact Report (Final EIR) is a compilation of documents including the Draft EIR made available to the public, and new Appendices to incorporate the Final EIR Amendment to the Draft EIR. This Final EIR document integrates these documents. In conformance with Section 15132 of the California Environmental Quality Act (CEQA) Guidelines, this Final EIR contains the following components:

- The Draft EIR (incorporated by reference);
- Revisions to the Draft EIR (Section 2.0: Additions and Corrections);
- A list of persons, organizations, and public agencies commenting on the Draft EIR and responses to their comments (see **Section 3.0: Responses to Comments on the Draft EIR**); and
- Mitigation Monitoring and Reporting Program to ensure that the mitigation measures identified for the Project in the EIR are implemented (**Section 4.0: Mitigation Monitoring and Reporting Program**).

The Draft EIR was circulated to the affected public agencies and interested parties for a 45-day review period from March 13, 2023 until April 27, 2023. Comments were accepted through May 1, 2023. **Appendix 2.0** contains the Notice of Availability (NOA) of the Draft EIR and NOA recipients. **Section 3.0: Responses to Comments on the Draft EIR** contains the comments received on the Draft EIR by the Ontario International Airport Authority (OIAA) as Lead Agency.

This Final EIR has been prepared pursuant to Section 15089 of the CEQA Guidelines and incorporates the March 2023 Draft EIR by reference; comments on the Draft EIR received during the 45-day public comment period; written responses to these comments; and corresponding revisions to the text of the Draft EIR. The Draft EIR is available on OIAA's website at:

https://www.flyontario.com/corporate/environment/environment-reports

1.1.1 Purpose of the Final EIR

In accordance with CEQA Guidelines Section 15132, Contents of Final Environmental Impact Report, this Final EIR provides a summary of the Draft EIR public review, including a list of who received notification of the availability of the Draft EIR, locations where the NOA was posted, a response to comments (RTC) matrix summarizing agency and public comments received on the Draft EIR, as well as OIAA responses to comments. The Final EIR also provides a summary of

mitigation measures intended to reduce or eliminate significant environmental impacts (see **Section 4.0: Mitigation Monitoring and Reporting Plan**, in this Final EIR).

Pursuant to CEQA Guidelines Section 15090(a), prior to approving a project, the OIAA, as the Lead Agency, shall certify that:

- The Final EIR has been completed in compliance with CEQA;
- The Final EIR was presented to the decision-making body of the lead agency, and that the decision-making body reviewed and considered the information contained in the Final EIR prior to approving the Project; and
- The Final EIR reflects the lead agency's independent judgment and analysis.

In conjunction with certification of the Final EIR, OIAA must adopt one or more of the following written Findings of Fact for each significant environmental impact identified in the EIR:

- The Project was changed (including adoption of mitigation measures) to avoid or substantially reduce the magnitude of the impact;
- Changes to the Project are within another agency's jurisdiction and have been or should be adopted; or
- Specific considerations make mitigation measures or alternatives infeasible.

Section 15097 of the CEQA Guidelines states that the lead agency must adopt a Mitigation Monitoring and Reporting Program (MMRP) to ensure that the mitigation measures identified for the Project in the EIR are implemented. The MMRP is provided in **Section 4.0: Mitigation Monitoring and Reporting Plan**, in this Final EIR.

1.1.2 Public Review

In conformance with California Public Resources Code (PRC) Section 21092.5 and CEQA Guidelines Section 15088(b), responses to comments received from public agencies were provided to the commenting agency 10 days prior to the Final EIR certification hearing. The Final EIR and all documents referenced in the Final EIR are available for public review at the OIAA Administrative Offices during normal business hours and on OIAA's website at: https://www.flyontario.com/corporate/environment/environment-reports.

1.2 PROJECT BACKGROUND

1.2.1 Project Description

The proposed Project site consists of approximately 97 acres located at Ontario International Airport (Airport) in the City of Ontario, San Bernardino County. The proposed Project is an aeronautical development and use that is within the Airport boundaries and is consistent with the Ontario International Airport Layout Plan. The proposed Project would replace existing, underutilized airport-related buildings and site improvements with an air cargo center. The Project would include demolition of the existing buildings and improvements on the site, and the development of a new air cargo center and cargo sorting building (Air Cargo Sort Building), truckyard, parking facilities, two aviation support buildings (ground service equipment [GSE] and aircraft line maintenance buildings), and aircraft apron improvements in two phases.

The Air Cargo Sort Building, proposed north of East Avion Street, would contain a sorting facility and office spaces. The aircraft parking apron would surround the building to the west, north, and east. A ground-level visitor parking lot and truckyard are proposed on the south side of the cargo building, with access from East Avion Street. A parking structure for employees is proposed south of East Avion Street, with a pedestrian bridge connecting the parking structure to the office building. A new substation proposed by SCE for the proposed Project would be located to the west of the parking structure. Fire lanes would be located around the substation and parking structure. Phase 1 of the proposed Project would take place on the easternmost 62 acres of the Project site, and Phase 2 would occur on the remaining western 35 acres.

Phase 1 construction would include the demolition of existing structures and site improvements in the Phase 1 area, as well as site preparation and construction of all proposed improvements on the eastern 62 acres of the Project site, including the initial phase of the Air Cargo Sort Building, aircraft apron improvements, and parking structure. Phase 2 would occur on the western 35 acres of the Project site and include the demolition of structures and site improvements in the Phase 2 area, site preparation, and construction of the remaining improvements, including the expansion of the Air Cargo Sort Building and aircraft apron improvements.

1.2.2 Responsible Agencies

Responsible agencies, as defined in Public Resources Code 21069, are public agencies, other than the lead agency, that also have responsibilities for carrying out or approving a project. **Table 1-1: Intended Uses of EIR**, lists the agencies that are expected to use the EIR in their decision making and the type of approvals required to implement the proposed Project.

TABLE 1-1 INTENDED USES OF EIR	
Public Agency	**Approvals and Decisions**
Ontario International Airport Authority	• Certify Final EIR and Adopt Mitigation Monitoring and Reporting Program • Approve the Project as described, reflected and depicted in Section 3.4 (Project Description) of the Draft EIR (including, without limitation, the Figures therein), and as may be modified in the Final EIR • Approve Facility Use Agreement • Approve Lease Agreement • Approve Notice to Proceed for Construction • Approve Air Carrier Operating Permit • Approve Operating Use and Terminal Lease Agreement
City of Ontario	• Approve Development Plan Review and Issue Building Permits • Connections to City Utilities
South Coast Air Quality Management District	• Approve Permit for Emergency Generator and Fire Pump

1.3 ENVIRONMENTAL REVIEW PROCESS

OIAA is the Lead Agency responsible for preparation of this Final EIR because it has the principal responsibility for approving and implementing the proposed Project.

1.3.1 Notice of Preparation

Pursuant to CEQA Guidelines §§ 15060(d) and 15063(a), an Initial Study was not prepared and the OIAA issued a Notice of Preparation (NOP) of an EIR for the proposed Project (Appendix 1.0-1 to the Draft EIR). The purpose of the NOP was to solicit comments from public agencies with expertise in subjects evaluated in this Draft EIR. The NOP was circulated to public agencies for a 30-day public review period, commencing October 15, 2021, and ending November 15, 2021.

The NOP identified seven environmental topics which were eliminated from further evaluation in the Draft EIR as shown in **Table 1-2: Environmental Topics Eliminated from Evaluation in the Draft EIR**. Letters received by OIAA in response to the NOP are provided in Appendix 1.0-3 to the Draft EIR.

TABLE 1-2 ENVIRONMENTAL TOPICS ELIMINATED FROM EVALUATION IN THE DRAFT EIR	
• Agriculture and Forestry Resources • Land Use and Planning • Mineral Resources • Population and Housing	• Parks / Recreation • Public Services (Schools and Other Public Facilities) • Wildfire

1.3.2 Scoping Meeting

The proposed Project meets the definition in § 15206(b)(2)(E) of the CEQA Guidelines of a project of Statewide, regional, or areawide significance. Accordingly, pursuant to CEQA Guidelines § 15082(c)(1), the OIAA conducted a scoping meeting for the proposed Project to solicit comments on the scope and content of the Draft EIR. The scoping meeting was held on Wednesday, November 10, 2021, at 2:00 PM (Pacific Time) at the Ontario International Airport Authority Board Room (1923 E. Avion Street, Room 100, Ontario).

The meeting provided an overview of the EIR process for the proposed Project. Comments were accepted after the meeting and are summarized in **Table 1-3: Summary of Scoping Meeting Comments**, below. The presentation and sign-in sheet are included in Appendix 1.0-2 to the Draft EIR.

TABLE 1-3 SUMMARY OF SCOPING MEETING COMMENTS	
Topic Area	**Comments**
Application of CEQA vs. NEPA	• A question was asked about whether both CEQA and/or NEPA apply to the Project. • A question was asked about how to track progress of NEPA process.
Aviation Forecasts	• A question was asked about how long FAA consultation on aviation forecasts takes. • A question was asked about how to keep up to date with FAA consultation activity.
Noise	• Concern was expressed about aviation activity and forecasts as it relates to noise complaints from local community about hours of operations and procedures regarding aircraft operations. • Questions were asked about actions and activities taken under CEQA and/or NEPA regarding noise. • A comment asked for mitigation measures to minimize aviation noise.

TABLE 1-3
SUMMARY OF SCOPING MEETING COMMENTS

Topic Area	Comments
Project Phasing	• A question was asked about why the proposed Project is to be completed in multiple phases.
Cargo Movements	• A question concerned where and how cargo movements take place. • A question concerned parking positions for planes on the edge of the apron.
Administrative Building Replacement	• A question was asked about relocation of the OIAA administrative building, as implementation of the Project will require the current facility to be demolished.
Additional Development Projects	• A question concerned the redevelopment occurring to the west of the proposed Project's parking structure.

1.3.3 Consultation with Responsible Agencies

In accordance with PRC § 21153, the OIAA consulted two responsible agencies as part of the EIR scoping process. OIAA met with the City of Ontario on October 27, 2021, and the South Coast Air Quality Management District (SCAQMD) on November 4, 2021. At each meeting, a brief presentation of the proposed Project was provided and issues germane to the responsible agencies' purview were discussed to ensure that th Draft EIR adequately addresses agency concerns and that the analysis conducted is consistent with their recommended approach and methodologies.

The OIAA notified Native American Tribes of the proposed Project. The tribes listed on the Native American Heritage Commission's response to the Notice of Preparation were contacted via email, including 18 individuals representing 12 Native American tribal groups for local knowledge of tribal cultural resources in the project area. Two of the 12 tribes, the Agua Caliente Band of Cahuilla Indians and San Manuel Band of Mission Indians, responded that the Project site is not within their ancestral territory. No other tribes have responded to date and requested consultation. Consultation letters and responses to the Native American tribal groups are in Appendix 5.13-1 to the Draft EIR.

1.3.4 Notice of Availability

On March 13, 2023, OIAA circulated a Notice of Availability (NOA; State Clearinghouse Number [SCH] 2021100226) of the Draft EIR for review and comment by the public, responsible, and

reviewing agencies. The Draft EIR was made available for public review for 45 days from March 13, 2023 through April 27, 2023. During the 45-day comment and review period, nine (9) comment letters were received during the Draft EIR comment period. Five (5) agencies commented on the Draft EIR (two comment letters were received from South Coast Air Quality Management District [SCAQMD], one of which was a request for additional information), two (2) organizations, and one (1) member of the public commented on the Draft EIR (requesting clarification on the website for the Draft EIR).

A Notice of Completion (NOC) of the Draft EIR was also provided on March 13, 2023, to the State Clearinghouse. Following the completion of the 45-day public review period for the Draft EIR, OIAA prepared this Final EIR in accordance with Sections 15089 and 15132 of the CEQA Guidelines.

1.4 DRAFT EIR

OIAA prepared the Draft EIR and released it for public review on March 13, 2023. The Draft EIR provided analysis of topics related to the potential environmental effects of the proposed Project in accordance with CEQA.

The Draft EIR provided analysis of the following topics in **Table 1-4: Environmental Topics Identified in the NOP for Further Evaluation**.

TABLE 1-4
ENVIRONMENTAL TOPICS IDENTIFIED IN THE NOP FOR FURTHER EVALUATION

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology / Soils
- Greenhouse Gas Emissions
- Hazards / Hazardous Materials
- Hydrology / Water Quality
- Noise
- Public Services (Fire and Police)
- Transportation
- Tribal Cultural Resources
- Utilities / Service Systems

1.4.1 Summary of Impacts

Section 7.0: Effects Not Found to be Significant in the Draft EIR provides a brief description of the potential significant effects of the proposed Project determined not to be significant that were not analyzed in detail within the Draft EIR. As described in the Notice of Preparation (Appendix 1.0-1 to the Draft EIR) and below, proposed Project implementation would not result in significant impacts related to the seven environmental topics as discussed below. Therefore,

detailed evaluation of the potential impacts of the proposed Project related to these topics is not provided in the Draft EIR:

- **Agriculture and Forestry Resources.** The Project site is not designated farmland or under a Williamson Act contract.[1] The California Department of Conservation designates the site Urban and Built-Up Land.[2] The site is currently developed with, and surrounded by, airport-related and industrial uses. Due to its location within the Airport and its developed condition, the Project site is not suitable for agricultural and timberland production. Based on these characteristics, the proposed Project would not impact agricultural and timberland resources.
- **Land Use and Planning.** The proposed Project has been designed and would operate in accordance with OIAA rules and regulations, and as an aeronautical development and use under OIAA's jurisdiction. Also, the City of Ontario General Plan land use designation for the Project site is Airport, and the site is zoned ONT for Ontario International Airport.[3,4] The ONT zoning district allows airport terminals (including commercial and service uses related to the terminals), car rental agencies, and airport-related industrial and delivery uses, at a maximum intensity of 0.55 floor to area ratio (FAR) for the entire Airport. The proposed Project proposes 1,261,712 square feet of buildings and structures on the 97-acre site, which results in a FAR of approximately 0.34 for the Project site.
- The proposed Project is also required to comply with the FAA-approved Ontario International Airport Layout Plan (ALP). The ALP serves as a guide for the Airport's future development and identifies the Project site as "Airport Development Area," which is the designation for future development.[5] The proposed Project would be consistent with adjacent Airport and industrial uses, as well as applicable OIAA, City of Ontario, and FAA-adopted plans, policies, and regulations. The proposed Project would not physically

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1 City of Ontario. "Status of Williamson Act Contracts." September 28, 2017. http://www.ontarioca.gov/sites/default/files/Ontario-Files/Planning/Ontario-Ranch/williamson_act_status_map_sept._2017.pdf.

2 California Department of Conservation. "California Important Farmland: 1984-2018." https://maps.conservation.ca.gov/dlrp/ciftimeseries/. Accessed August 2021.

3 City of Ontario. *The Ontario Plan*. Exhibit LU-01, Land Use Plan. https://www.ontarioplan.org/wp-content/uploads/sites/4/2021/05/TOPLUP_Map24x3610_6_20210524_V_1. Accessed October 2021.

4 City of Ontario. "Zoning Map." Adopted 2015, December 1, and amended in 2021, February 2. https://www.ontarioca.gov/sites/default/files/Ontario-Files/Planning/Documents/Zoning%20Map/Zoning_20210212.pdf. Accessed October 2021.

5 Ontario International Airport Authority. *Airport Layout Plan Narrative Report*. Future Land Use, Sheet 16. April 2021.

divide an established community or result in off-site land use changes. Accordingly, the proposed Project would have less-than-significant effects related to Land Use and Planning.

- **Mineral Resources.** According to the *Ontario General Plan* Final EIR, the City contains no mineral resources of Statewide significance. There are, however, a few sites in the City, the closest of which is approximately one mile to the north, that contain regionally significant mineral resources deposited by the Deer and Day Creek alluvial fan with potential aggregate resources, commonly known as gravel.[6] Project implementation would not impact these sites or result in the loss of regionally and locally important mineral resources. Based on this information, the proposed Project would have a less-than-significant effect on mineral resources.
- **Population and Housing.** The Project site contains airport office buildings, hangars, and support facilities. There are no residences on the Project site. Project implementation would not displace people or result in the demolition of existing housing that would require the construction of replacement housing elsewhere. The proposed Project would not impact housing stock. The proposed Project includes utility improvements; however, these would be designed to serve Project operations and would not directly or indirectly result in unplanned population growth.
- The proposed Project would increase employment opportunities in the region. The proposed Project would create approximately 1,315 jobs. According to the US Bureau of Labor Statistics, in June 2021, there was an unemployment rate of 7.9 percent (approximately 165,600 people were unemployed) in the Riverside-San Bernardino-Ontario area.[7] Accordingly, the 1,315 jobs generated by the proposed Project can employ existing residents in the Riverside-San Bernardino-Ontario area; thus, the proposed Project would not trigger the need for new housing. The proposed Project would result in less-than-significant effects related to population and housing.
- **Parks/Recreation.** The City of Ontario contains a variety of recreational opportunities, including regional and City parks, school recreation facilities, private parks and golf courses, and recreational trails for bicycles, horses, and hiking. Park and recreation facilities closest to the Project site include a bicycle corridor along Mission Boulevard and the Cucamonga Creek Multipurpose Trail. Project construction and operation would not

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6 City of Ontario. *The Ontario Plan Draft EIR*. Figure 5.11-1, Mineral Resource Zones. https://www.ontarioplan.org/wp-content/uploads/sites/4/2016/05/32084.pdf. Accessed August 2021.

7 United States Bureau of Labor Statistics. "Riverside-San Bernardino-Ontario, CA." https://www.bls.gov/eag/eag.ca_riverside_msa.htm. Accessed August 2021.

directly affect these or other recreation facilities. Therefore, the proposed Project would not result in significant effects on parks and recreation facilities.

- **Public Services** (Schools and Other Public Facilities. Potential impacts to Fire and Police Public Services are discussed in Section 5.11 of this Draft EIR). The Project site is within the boundaries of the Ontario-Montclair Elementary School District and Chaffey Joint Union High School District. The proposed Project does not include residential development and would not generate students that would need to be housed at public school facilities. Nevertheless, the Project would comply with applicable laws and regulations, including the payment of school impact fees for the proposed commercial/industrial development that would reduce potential impacts to school facilities to less than significant. The Project would not require any other government services, such as library and public health services; therefore, potential effects related to other public facilities would be less than significant.
- **Wildfire.** The Project site is in a Local Responsibility Area and classified by CAL FIRE as non-VHFHSZ (non-very high fire hazard severity zone).[8] The site and surrounding areas are flat and developed with urban uses that would not contribute to the uncontrolled spread of wildfire or exacerbate potential wildfire risks, including downslope flooding and landslides caused by runoff, slope instability, or drainage changes from wildfire. Furthermore, as further discussed in Impact HAZ-6 in Section 5.8: Hazards and Hazardous Materials in the Draft EIR, the proposed Project would not impair adopted emergency response and evaluation plans. Therefore, the proposed Project would not result in, or be subject to, significant effects related to wildfire risk.

Table 1-5: Environmental Impact Summary presents a summary of findings for each topic analyzed in the Draft EIR for the proposed Project. As shown, impacts related to air quality, biological resources, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, noise, transportation, and tribal cultural resources were determined to be significant prior to mitigation.

8 CAL Fire. Office of the State Fire Marshal. "Fire Hazards Severity Zones." https://egis.fire.ca.gov/FHSZ/. Accessed August 2021.

TABLE 1-5
ENVIRONMENTAL IMPACT SUMMARY

Topic	Potentially Significant Impact?	Mitigated to Less than Significant?	Unavoidable Significant Impact?
Aesthetics	No	N/A	N/A
Air Quality	**Yes**	No	Yes
Biological Resources	**Yes**	Yes	No
Cultural Resources	**Yes**	Yes	No
Energy	No	N/A	N/A
Geology and Soils	**Yes**	**Yes**	No
Greenhouse Gas Emissions	**Yes**	No	Yes
Hazards and Hazardous Materials	**Yes**	**Yes**	No
Hydrology and Water Quality	No	N/A	N/A
Noise	**Yes**	**Yes**	No
Public Services	No	N/A	N/A
Transportation	**Yes**	No	Yes
Tribal Cultural Resources	**Yes**	**Yes**	No
Utilities and Service Systems	No	N/A	N/A

Measures have been identified to mitigate these impacts to less than significant, with the exception of the air quality, greenhouse gas emissions, and transportation impacts associated with operation of the proposed Air Cargo facility. Based on the analysis conducted within this Draft EIR document, operation of the proposed Project would result in significant air quality, greenhouse gas emission, and transportation impacts that cannot be mitigated to a less-than-significant level. As discussed further below, no feasible mitigation is available to reduce impacts to a level of insignificance.

1.4.1.1 Air Quality

As discussed in Section 5.2: Air Quality in the Draft EIR, estimated emissions from operation of Phase 1 and Phase 2 of the proposed Project would exceed SCAQMD significance thresholds

for CO, VOC, NOx (Phases 1 and 2), and SO_2 (Phase 2 only), primarily due to aircraft emissions, followed by employee vehicles, delivery trucks, and emergency generators. The proposed Project would incorporate Project Design Features PDF AQ-1 through PDF AQ-11 and Mitigation Measures MM AQ-1 through MM AQ-16, as well as MM TRANS-1 through TRANS-5 in Section 5.12: Transportation in the Draft EIR to reduce operational air quality emissions to the greatest extent feasible. Neither the SCAQMD nor OIAA have the authority to regulate aircraft operations or emissions from aircraft engines and the majority of the emissions estimated for operation of the proposed Project are from aircraft operations. The 2016 and 2022 Air Quality Management Plan (AQMP) identifies actions that can be taken by other agencies with regulatory jurisdiction to address these sources of emissions, including the adoption of more stringent criteria pollutant standards for aircraft engines and use of cleaner aviation fuels. It is anticipated that these types of future technology improvements will reduce the aviation emissions associated with the proposed Project over time. As the proposed Project is an air cargo facility serving the region, the operational and economic viability of the proposed Project relies on these aviation operations. For these reasons, there are no additional feasible mitigation measures that would reduce operational emissions to below significance thresholds and operational air quality emissions would remain significant after implementation of all feasible mitigation.

1.4.1.2 Greenhouse Gas Emissions

As discussed in Section 5.7: Greenhouse Gas Emissions in the Draft EIR, the proposed Project would generate approximately 128,057 $MTCO_2e$ of GHG emissions per year at full buildout. The majority (i.e., over 75 percent) of the GHG emissions associated with future operation of the proposed Project are related to aircraft sources (i.e., aircraft, auxiliary power unit [APU], and ground service equipment [GSE]). Project Design Features PDF AQ-1 through PDF AQ-11, Mitigation Measures MM AQ-1 through MM AQ-16, and MM TRANS-1 through TRANS-5 in Section 5.12: Transportation in the Draft EIR, would serve to reduce GHG emissions. Additionally, the proposed Project includes Project Design Features PDF GHG-1 and PDF GHG-2 to reduce GHG emissions to the greatest extent feasible. As discussed, neither the SCAQMD nor OIAA have the authority to regulate aircraft operations or emissions from aircraft engines and the majority of the emissions estimated for operation of the proposed Project are from aircraft operations. As with the operational air quality emissions associated with the proposed Project, while it is anticipated future technology improvements are anticipated to reduce Project GHG emissions over time, there are no additional feasible mitigation measures available at this time that would reduce GHG emissions to below significance thresholds. For this reason, the proposed Project's GHG emissions would remain significant after implementation of all feasible mitigation.

1.4.1.3 Transportation

As discussed in Section 5.12: Transportation in the Draft EIR, the truck, employee, and other trips generated by the proposed Project would result in the Project total vehicle miles traveled (VMT) per service population (employees for this proposed Project) being 22 percent above the City's VMT significance threshold of 29.76 VMT per service population. Approximately 70 percent of the proposed Project VMT would be generated by employee, guest, and delivery trips, with the other 30 percent generated by trucks associated with the movement of cargo from the proposed facility throughout the region. To mitigate the significant VMT impact, Project total VMT per service population would need to be reduced by 22 percent. It is not feasible to reduce the portion (30 percent) of Project VMT generated by trucks transporting cargo, as the proposed Project is an air cargo facility serving a large region and the operational and economic viability of the proposed Project relies on trucks picking up and delivering cargo. To mitigate the VMT impact of the proposed Project, focusing solely on truck trips, the truck VMT would need to be reduced by 75 percent. In addition, to mitigate the VMT impact of the proposed Project focusing solely on passenger vehicles, the proposed Project's passenger car VMT would need to be reduced by 33 percent. VMT generated by employees, guests, and deliveries, considered alone, is already under the City's VMT significance threshold of 29.76 VMT per service population. As discussed in Section 5.12, Transportation of the Draft EIR, implementation of all feasible mitigation measures (MM TRANS-1 through MM TRANS-5) for employee trips is estimated to reduce the proposed Project's employee VMT by a maximum of 5.10 percent, which is the maximum extent feasible, but falls short of the 33 percent reduction required to mitigate the VMT impact of the proposed Project to less than significant. There are no additional feasible mitigation measures available at this time that would reduce operational VMT to below significance thresholds and, for this reason, VMT would remain significant after implementation of all feasible mitigation.

1.4.2 Conclusion

Significant unavoidable impacts related to air quality, GHG, and transportation have been identified. No feasible mitigation is available to reduce these impacts to less-than-significant levels. All other significant impacts of the Proposed Project would be reduced to a less-than-significant level with the implementation of mitigation measures identified in the Draft EIR and this Final EIR.

2.0 ADDITIONS AND CORRECTIONS TO THE DRAFT EIR

The Ontario International Airport Authority (OIAA), acting as the Lead Agency for the planning and environmental review of the proposed Project, has prepared this Final Environmental Impact Report (Final EIR) pursuant to the requirements of the California Environmental Quality Act (CEQA). In accordance with the CEQA Guidelines Section 15132 (a), this section of the Final EIR identifies changes to the Draft EIR made to clarify, correct, or supplement the information in the Draft EIR made in response to comments on the Draft EIR. The changes described in this section do not result in the identification of any new or increased significant environmental impacts that would result from the proposed Project.

2.1 UPDATES TO THE DRAFT EIR

2.1.1 Introduction

Updates to the Draft EIR include a minor revision to the Project Description to reflect the relocation of two small, single-story aircraft support buildings, each approximately 26,000 square feet in size—the Ground Support Equipment (GSE) Maintenance Building and Aviation Line Maintenance Building—from the northern edge of the Project site immediately south of Taxiway "S" to the southeast corner of the Air Cargo Sort Building site; revisions regarding the requirement for a Preliminary Water Quality Management Plan (PWQMP); updates regarding the existing water and sewer connections and how the proposed Project would be connected for construction and operation; revisions to figures; the addition of one mitigation measure for biological resources; revisions to the Opening Year (2025) Plus Phase 1 Project Conditions LOS analysis in Section 5.12 and Appendix 5.12-1 to include correct Synchro analysis; revisions to two project design features included in the Draft EIR, PDF AQ-1 and PDF GHG-2, and two mitigation measures, MM AQ-5 and MM AQ-6, for air quality and greenhouse gas (GHG); and three new project design features and nine additional mitigation measures for air quality and GHG.

Additional corrections, additions, and revisions are provided in *Section 2.2: Revisions to the Draft EIR*.

2.1.1.1 Relocation of Ground Support Equipment (GSE) and Aviation Line Maintenance Buildings

The relocation of the aircraft support buildings from one location to another location on the aircraft apron on the Project site will not result in any additional impacts as the size and function of these buildings will not change. The operational characteristics of the proposed Project, as

defined and analyzed in the Draft EIR, will not change as a result of the relocation of these maintenance buildings.

2.1.1.2 Preliminary Water Quality Management Plan

Discussion of the requirement for a PWQMP has been removed from the EIR in response to a comment from the City of Ontario clarifying that a PWQMP is only required by the City of Ontario to demonstrate MS4 Permit Compliance if the runoff from a site enters Ontario streets and storm drain system. The Project Site would discharge to the storm drain planned in East Avion Street as part of the OIAA East Avion Street Realignment project (Related Project F in the Draft EIR). The Project site would not directly discharge into the Cucamonga Channel, nor would it increase the current pre-development flow rates. As Avion Street is a private street, the Final EIR has been revised to clarify that PWQMP is not required. The proposed Project includes water quality treatment features that are described and analyzed in the Draft EIR. The Project will not result in any water quality impacts and this clarification in the applicability of existing regulations related to water quality does not affect this conclusion.

The Final EIR has also been revised to state there is no existing potable water main in Avion Street and that the Project will connect to the new 18-inch water main on Avion Street that will be constructed between Vineyard Avenue and the point of connection east of the Cucamonga Channel as part of the OIAA East Avion Street Realignment project. Additionally, the Final EIR has been revised to state there is no existing sewer main in Avion Street. The existing sewer main the Project will connect to is located south of Avion Street behind OIAA maintenance facilities. No additional impacts have been identified based on this updated information on the location of existing and planned utilities that will serve the proposed Project.

All utilities figures have been updated to include "Draft" in the source title. Additionally, **Figure 5.8-2: Ontario Airport Safety Zones** in Section 5.8: Hazards was updated to include the most recent 2018 update of the Ontario Airport Land Use Plan Safety Map.

2.1.1.3 Biological Resources Mitigation Measure

The Final EIR incorporates an additional mitigation measure in Section 5.3: Biological Resources requiring pre-construction bat roosting surveys to confirm no maternity roosts are established and present on the site prior to construction. The biological resources assessment in Appendix 5.3.1 of the Draft EIR includes the findings of surveys of the Project site. No bats were observed during these surveys and the ornamental plant species found on the Site do not provide suitable long-term roosting or maternity habitat and, for this reason, none of the sensitive bat species known to occur in the area are expected to occur onsite. The addition of this mitigation measure

does not change the conclusion in the Draft EIR that the Project will not result in significant impacts to sensitive bat species.

2.1.1.4 Opening Year (2025) Plus Phase 1 Project Conditions LOS Synchro Analysis

The Traffic Study has been updated to correct the Synchro analysis for the Opening Year (2025) Plus Phase 1 Project PM Peak Hour Scenario (see **Appendix 1.0** to this Final EIR). With this update, under Opening Year (2025) Plus Phase 1 Project Conditions, the number of intersections projected to operate at LOS F increases from 2 to 3. Two intersections were identified as operating at LOS F under Opening Year (2025) No Project Conditions. The addition of Project traffic is forecast to now add delay to the intersection of Archibald Avenue at Mission Boulevard under the Opening Year (2025) Plus Phase 1 Project Conditions scenario. Improvements, consisting of adding a dedicated left-turn pocket for the southbound approach with protected left-turn phasing for the northbound and southbound left-turn phases are identified that will improve operating conditions at this intersection to better than pre-project conditions. Additionally, Archibald Avenue is programmed in the SCAG RTP to be widened to six lanes in each direction which is greater than the improvements identified as needed to improve this intersection to better than pre-project conditions. With the identified improvements to improve operating conditions at this intersection to better than pre-project conditions, this intersection would continue to operate at LOS E, consistent with the level of service standard in the City's General Plan, The Ontario Plan. The proposed Project would not conflict with any standard related to roadway facilities or services under Opening Year (2025) Conditions consistent with the conclusion in the Draft EIR.

2.1.1.5 Air Quality and Greenhouse Gas Project Design Features and Mitigation Measures

Two project design features included in the Draft EIR, PDF AQ-1 and PDF GHG-2, and two mitigation measures, MM AQ-5 and MM AQ-6, have been revised. Three new project design features and nine additional mitigation measures for air quality and GHG have been added in response to the South Coast Air Quality Management District (SCAQMD) comment letter dated April 25, 2023. Responses to the SCAQMD letter and the revisions and additions to the air quality and GHG PDFs and mitigation measures are provided in **Section 3.0: Responses to Comments on the Draft EIR** in this Final EIR. The revised and additional PDFs and mitigation measures are environmentally beneficial and intended to reduce the intensity of the proposed Project's emissions-generating activities; as such, these changes to the Draft EIR do not substantially

increase the severity of the significant impacts related to air quality and GHG reported in the Draft EIR.

2.2 REVISIONS TO THE DRAFT EIR

Provided below are corrections and additions to the Draft EIR. Changes are identified below by the corresponding Draft EIR section and subsection, if applicable, and the page number. Additions are double underlined and deletions are shown in strikethrough (~~strikethrough~~) format. All corrections and additions presented below would not change or substantially increase the severity of the impact conclusions in the Draft EIR.

Section 1.0 Executive Summary

Page	Revision
1.0-7	The Draft EIR has been revised to update the air quality and GHG PDFs and mitigation measures in the executive summary in response to the SCAQMD comment letter dated April 25, 2023.

Air Quality

As discussed in **Section 5.2: Air Quality**, estimated emissions from operation of Phase 1 and Phase 2 of the proposed Project would exceed South Coast Air Quality Management District (SCAQMD) significance thresholds for CO, VOC, NOx (Phases 1 and 2), and SO_2 (Phase 2 only), primarily due to aircraft emissions, followed by employee vehicles, delivery trucks, and emergency generators. The proposed Project would incorporate Project Design Features **PDF AQ-13** through **PDF AQ-811** and Mitigation Measures **MM AQ-14** through **MM AQ-716** as well as mitigation measures **TRANS-1** through **TRANS-5** in **Section 5.12: Transportation,** of this Draft EIR to reduce operational air quality emissions to the greatest extent feasible. Neither the SCAQMD nor OIAA have the authority to regulate aircraft operations or emissions from aircraft engines and the majority of the emissions estimated for operation of the proposed Project are from aircraft operations. The 2022 AQMP identifies actions that can be taken by other agencies with regulatory jurisdiction to address these sources of emissions, including the adoption of more stringent criteria pollutant standards for aircraft engines and use of cleaner aviation fuels. It is anticipated that these types of future technology improvements will reduce the aviation emissions associated with the proposed Project over time. As the proposed Project is an air cargo facility serving the region, the operational and economic viability of the proposed Project relies on these aviation operations. For these reasons, there are no additional feasible mitigation measures that would reduce operational emissions to below significance thresholds and

operational air quality emissions would remain significant after implementation of all feasible mitigation.

Greenhouse Gas Emissions

As discussed in **Section 5.7: Greenhouse Gas Emissions**, the proposed Project would generate approximately 128,057 $MTCO_2e$ of GHG emissions per year at full build-out. The majority (i.e., over 75 percent) of the GHG emissions associated with future operation of the proposed Project are related to aircraft sources (i.e., aircraft, auxiliary power unit [APU], and ground service equipment [GSE]). Project Design Features **PDF AQ-13** ~~through PDF AQ-5, PDF AQ-7,~~ through **PDF AQ-811,** Mitigation Measures **MM AQ-14** through **MM AQ-716,** and mitigation measures **TRANS-1** through **TRANS-5** in **Section 5.12: Transportation,** of this Draft EIR would serve to reduce GHG emissions. Additionally, the proposed Project includes Project Design Features **PDF GHG-1** and **PDF GHG-2** to reduce GHG emissions to the greatest extent feasible. As discussed above, neither the SCAQMD nor OIAA have the authority to regulate aircraft operations or emissions from aircraft engines and the majority of the emissions estimated for operation of the proposed Project are from aircraft operations. As with the operational air quality emissions associated with the proposed Project, while it is anticipated future technology improvements are anticipated to reduce Project GHG emissions over time, there are no additional feasible mitigation measures available at this time that would reduce GHG emissions to below significance thresholds and for this reason, the proposed Project's GHG emissions would remain significant after implementation of all feasible mitigation.

Page	Revision
1.0-15	The Draft EIR has been revised to update the air quality and GHG PDFs and mitigation measures in the executive summary for Threshold AQ-2 in response to the SCAQMD comment letter dated April 25, 2023.

Threshold AQ-2: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard?

Potentially Significant Impact. Air quality emissions would be generated during construction from mobile, area, stationary, fugitive dust sources. Construction emissions during Phase 1 and Phase 2 would not exceed any regional SCAQMD thresholds.

Operational sources of airport-related air pollutant emissions include aircraft, APU, GSE, stationary sources such as emergency generators, and motor vehicles (employee and deliveries), as well as area sources (consumer products and landscaping), and energy usage (natural gas and

electrical). The proposed Project's operational emissions during Phase 1 and Phase 2 would exceed regional SCAQMD significance thresholds for CO, VOC, and NO_x, primarily due to aircraft emissions, followed by employee vehicles, delivery trucks, and emergency generators. Impacts would be potentially significant. The proposed Project would incorporate Project Design Features PDF AQ-13 through PDF AQ-811 and Mitigation Measures MM AQ-14 through MM AQ-716 as well as MM TRANS-1 through MM TRANS-5 to reduce operational air quality emissions to the greatest extent feasible. Neither the SCAQMD or OIAA have the authority to regulate aircraft operations or emissions from aircraft engines and the majority of the emissions estimated for operation of the Project are from aircraft operations. The 2022 AQMP identifies actions that can be taken by the CARB to address these sources of emissions, including the adoption of more stringent criteria pollutant standards for aircraft engines and use of cleaner aviation fuels. It is anticipated that these types of future technology improvements will reduce the aviation emissions associated with the Project over time. As the proposed Project is an air cargo facility serving the region, the operational and economic viability of the proposed Project relies on these aviation operations. For these reasons, there are no additional feasible mitigation measures that would reduce operational emissions to below significance thresholds and operational air quality emissions would remain significant after implementation of all feasible mitigation.

PDF AQ-1: For all phases of construction activity, Tthe Applicant shall require use of off-road construction equipment that is zero emission, if and to the extent available, or diesel-fueled off-road construction equipment that meets the USEPA's Tier 4 emissions standards for off-road diesel-powered construction equipment with 50 horsepower (hp) or greater~~, for all phases of construction activity~~. To ensure that Tier 4 or the cleanest construction equipment available would be used during the Project's construction, the OIAA shall confirm that the Applicant includes this requirement in applicable bid documents, purchase orders, and contracts. Additionally, the OIAA shall confirm that the Applicant also requires periodic reporting and provision of written construction documents by construction contractor(s) and conducts regular inspections to the maximum extent feasible to ensure and enforce compliance.

PDF AQ-9: The Air Cargo Sort Building shall incorporate all of the following design specifications and technologies:

- Building automation
- Efficient, heat pump HVAC
- Natural ventilation

- Purchase of electricity from the SCE 100% Clean Rate Program, if and to the extent feasible
- Efficient dock seals
- Rapid rise doors
- Solar shades
- Low use water appliances
- Sustainable, drought-tolerant landscaping featuring a native, non-invasive vegetation palette
- Submeters with advanced energy monitoring
- Main meter energy monitoring
- Efficient transformers
- Battery storage-ready infrastructure
- Building automation by an enhanced building management system
- Enhanced glazing

PDF AQ-10: The Project shall include electric charging infrastructure in the truckyard that, at a minimum, accords with all requirements of California's Building Energy Efficiency Standards, as set forth in Title 24, Part 6, of the California Code of Regulations.

PDF AQ-11: The storage and maintenance of Project-related delivery trucks shall occur only on-site. In the event that overnight parking of delivery trucks is necessary, such trucks shall be parked within the Project site.

MM AQ-5: The Applicant shall require, ~~where~~ if and to the extent feasible, the use of zero-emission or near zero-emission on-road heavy duty~~Project-related delivery~~ trucks as part of business operations beginning in 2025 (within at least 25 percent of the Project fleet).

The Applicant also shall require, ~~where~~ if and to the extent feasible, the use of zero-emission or near zero-emission on-road heavy duty~~Project-related delivery~~ trucks as part of the business operations beginning in 2029 (within at least 50 percent of the Project fleet).

MM AQ-6: The Applicant shall include, in the design requirements for the Project, ~~that a~~ cool roof ~~be installed~~installation to the extent roof space is not occupied by solar panels, in order ~~at the parking structure~~to reduce energy use and urban heat

island effects. ~~This requirement shall not apply if solar panels are installed on the parking structure.~~

MM AQ-8: The Applicant shall utilize Energy Star heating, cooling, and lighting devices, and appliances (e.g., Heating, Ventilation, and Air Conditioning (HVAC) units in the form of energy efficient commercial heat pumps) within the interior of the Air Cargo Sort Building.

MM AQ-9: In order to meet the requirements of Rule 1113 for controlling VOC emissions from architectural coatings, the Applicant will use water-based or low VOC cleaning products.

MM AQ-9: In order to reduce trips to and from the Project site during construction, the Applicant shall provide on-site food trucks during meal times.

MM AQ-10: Interior- and exterior-facing signs, including signs directed toward all dock and delivery areas, shall be posted by the Applicant to identify contact information to report idling violations to CARB, SCAQMD, and the building manager. These signs also shall inform truck drivers to shut off their engines when not in use.

MM AQ-11: Electric plugs for electric transport refrigeration units shall be provided at dock doors located at the Air Cargo Sort Building.

MM AQ-12: The Applicant shall train operational managers and employees on efficient scheduling and load management to eliminate unnecessary queuing of trucks.

MM AQ-13: Signs shall be posted by the Applicant at every truck exit driveway providing directional information to use truck routes as designated by the City of Ontario.

MM AQ-14: The Applicant shall require its facility operator(s) to train the staff in charge of keeping vehicle records on diesel technologies and compliance with CARB regulations by attending CARB-approved courses. Also, the Applicant shall require its facility operator(s) to maintain records on-site demonstrating regulatory compliance and make records available for inspection by OIAA, SCAQMD, and State of California upon request.

MM AQ-15: The Applicant shall include a provision in all operational freight hauling contracts requiring the use of 2010 model year trucks that meet CARB's 2010 engine emission standards, or newer and cleaner trucks, if and to the extent feasible.

MM AQ-16: During construction, the Applicant shall post interior- and exterior-facing signs to inform construction contractors to shut off truck and equipment engines when not in use.

Page	Revision
1.0-22	The following mitigation measure is incorporated to require pre-construction bat roosting surveys to confirm no maternity roosts are established and present on the site prior to construction in Threshold BIO-1.

Less Than Significant with Mitigation Incorporated. The Project site is not located within federally designated Critical Habitat. Based on habitat requirements for the identified special-status plant species, the Project site does not have the potential to support any of the special-status plant species known to occur within the vicinity of the site. Additionally, the plant species found in the proposed Project area do not provide suitable long-term roosting or maternity habitat. Of the 57 special-status wildlife species that have been recorded as observed in the Guasti and Ontario quadrangles, none of the species were observed during the field survey. The Project site could support the Cooper's Hawk, California horned lark, and California gull, which are CDFW Watch List Species. Additionally, the Project site could support the burrowing owl, which is a California Species of Special Concern and has been documented approximately 900 feet east of the Project site. To avoid potential impacts, **Mitigation Measure BIO-1** would require pre-construction surveys to determine the presence of burrowing owls to ensure that any burrowing owls potentially within this area are protected in accordance with CDFW recommendations. Implementation of **Mitigation Measure BIO-2** would require pre-construction Nesting Bird Surveys and would reduce potential impacts to migratory and nesting birds. **Mitigation Measure BIO-3** would require a pre-construction bat roosting survey shall be conducted by a qualified bat biologist on structures and trees being removed or impacted by construction on site that may provide suitable roosting opportunities for local common bat species within 14 days prior to construction. If bats are determined to be present, CDFW shall be consulted on creating a bat mitigation plan.

MM BIO-3: **Roosting Bats.** A pre-construction bat roosting survey shall be conducted on structures and ornamental tree species on site that may provide suitable roosting opportunities for local common bat species within 14 days prior to construction.

Page Revision

1.0-52 The Draft EIR has been revised to update the air quality and GHG PDFs and mitigation measures in the executive summary for Threshold GHG-1 in response to the SCAQMD comment letter dated April 25, 2023.

Threshold GHG-1: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Potentially Significant Impact. The estimated construction GHG emissions for the proposed Project are 7,248 $MTCO_2e$. The 30-year amortized construction related GHG emissions would be approximately 242 metric tons of $MTCO_2e$ per year. With implementation of the proposed Project, operational annual GHG emissions would be 79,798 $MTCO_2e$ annually for Phase 1 and 128,057 $MTCO_2e$ annually for Phase 2 when compared to Baseline emissions. The net increase in GHG emissions during Phase 1 and Phase 2 operation over baseline conditions is considered to be a significant impact on the environment. As such, impacts would be potentially significant. Project Design Features **PDF AQ-13** through **PDF AQ-511** and Mitigation Measures **MM AQ-1** through **MM AQ-716** as well as **MM TRANS-1** through **MM TRANS-5** would serve to reduce GHG emissions. Additionally, the proposed Project includes Project Design Features **PDF GHG-1** and PDF **GHG-2** to reduce GHG emissions to the greatest extent feasible. Neither the SCAQMD nor OIAA have the authority to regulate aircraft operations or emissions from aircraft engines and the majority of the emissions estimated for operation of the Project are from aircraft operations. As with the operational air quality emissions associated with the Project, while it is anticipated future technology improvements are anticipated to reduce Project GHG emissions over time, there are no additional feasible mitigation measures available at this time that would reduce GHG emissions to below significance thresholds and for this reason, operational GHG emissions would remain significant after implementation of all feasible mitigation.

PDF AQ-1: For all phases of construction activity, the Applicant shall require use of off road-construction equipment that is zero emission, if and to the extent available, or diesel-fueled off-road construction equipment that meets the USEPA's Tier 4 emissions standards for offroad diesel-powered construction equipment with 50 horsepower (hp) or greater. To ensure that Tier 4 or the cleanest construction equipment available would be used during the Project's construction, the OIAA shall confirm that the Applicant includes this requirement in applicable bid documents, purchase orders, and contracts. Additionally, the OIAA shall confirm that the Applicant also requires periodic reporting and provision of written construction documents by construction contractor(s) and conducts regular inspections to the maximum extent feasible to ensure and enforce compliance.

PDF AQ-2: The Applicant shall conduct concrete/asphalt demolition on-site to reuse concrete/asphalt generated during construction. During Phase 1, demolition would involve removal of approximately 2,047,320 square feet of asphalt/concrete, which would be recycled within the project site and not require offsite haul truck trips (i.e., avoiding 2,616 haul truck trips). During Phase 2, demolition would involve removal of approximately 1,045,440 square feet of asphalt/concrete, which would be recycled within the project site and not require offsite haul truck trips (i.e., avoiding 910 haul truck trips).

PDF AQ-9: The Air Cargo Sort Building shall incorporate all of the following design specifications and technologies:

- Building automation
- Efficient, heat pump HVAC
- Natural ventilation
- Purchase of electricity from the SCE 100% Clean Rate Program, if and to the extent feasible
- Efficient dock seals
- Rapid rise doors
- Solar shades
- Low use water appliances
- Sustainable, drought-tolerant landscaping featuring a native, non-invasive vegetation palette
- Submeters with advanced energy monitoring
- Main meter energy monitoring
- Efficient transformers
- Battery storage-ready infrastructure
- Building automation by an enhanced building management system
- Enhanced glazing

PDF AQ-10: The Project shall include electric charging infrastructure in the truckyard that, at a minimum, accords with all requirements of California's Building Energy Efficiency Standards, as set forth in Title 24, Part 6, of the California Code of Regulations.

PDF AQ-11: The storage and maintenance of Project-related delivery trucks shall occur only on-site. In the event that overnight parking of delivery trucks is necessary, such trucks shall be parked within the Project site.

MM AQ-5: The Applicant shall require, ~~where~~ if and to the extent feasible, the use of zero-emission or near zero-emission on-road heavy duty~~Project-related delivery~~ trucks as part of business operations beginning in 2025 (within at least 25 percent of the Project fleet).

The Applicant also shall require, ~~where~~ if and to the extent feasible, the use of zero-emission or near zero-emission on-road heavy duty~~Project-related delivery~~ trucks as part of the business operations beginning in 2029 (within at least 50 percent of the Project fleet).

MM AQ-6: The Applicant shall include, in the design requirements for the Project, ~~that a~~ cool roof ~~be installed~~installation to the extent roof space is not occupied by solar panels, in order ~~at the parking structure~~to reduce energy use and urban heat island effects. ~~This requirement shall not apply if solar panels are installed on the parking structure.~~

MM AQ-8: The Applicant shall utilize Energy Star heating, cooling, and lighting devices, and appliances (e.g., Heating, Ventilation, and Air Conditioning (HVAC) units in the form of energy efficient commercial heat pumps) within the interior of the Air Cargo Sort Building.

MM AQ-9: In order to reduce trips to and from the Project site during construction, the Applicant shall provide on-site food trucks during meal times.

MM AQ-10: Interior- and exterior-facing signs, including signs directed toward all dock and delivery areas, shall be posted by the Applicant to identify contact information to report idling violations to CARB, SCAQMD, and the building manager. These signs also shall inform truck drivers to shut off their engines when not in use.

MM AQ-11: Electric plugs for electric transport refrigeration units shall be provided at dock doors located at the Air Cargo Sort Building.

MM AQ-12: The Applicant shall train operational managers and employees on efficient scheduling and load management to eliminate unnecessary queuing of trucks.

MM AQ-13: Signs shall be posted by the Applicant at every truck exit driveway providing directional information to use truck routes as designated by the City of Ontario.

MM AQ-14: The Applicant shall require its facility operator(s) to train the staff in charge of keeping vehicle records on diesel technologies and compliance with CARB regulations by attending CARB-approved courses. Also, the Applicant shall require its facility operator(s) to maintain records on-site demonstrating regulatory compliance and make records available for inspection by OIAA, SCAQMD, and State of California upon request.

MM AQ-15: The Applicant shall include a provision in all operational freight hauling contracts requiring the use of 2010 model year trucks that meet CARB's 2010 engine emission standards, or newer and cleaner trucks, if and to the extent feasible.

MM AQ-16: During construction, the Applicant shall post interior- and exterior-facing signs to inform construction contractors to shut off truck and equipment engines when not in use.

PDF GHG-1: The Air Cargo Sort Building shall be all-electric (no natural gas usage).

PDF GHG-2: The proposed Project shall include a ~~1.5~~3.8-Megawatt Solar PV Panel System on the rooftop of the Air Cargo Sort Building and Parking Structure.

Page	Revision
1.0-93	The Draft EIR has been revised to state there is no existing potable water main in Avion Street and that the Project will connect to the new 18-inch water main on Avion Street that will be constructed between Vineyard Avenue and the point of connection east of the Cucamonga Channel as part of the OIAA East Avion Street Realignment project.

Threshold U-1: Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.

Less Than Significant Impact. Short-term construction activities would require minimal water and are not expected to have any adverse impacts on the existing water system or available water supplies. During operation, the Air Cargo Sort Building would be connected to ~~the existing 16-inch water main along East Avion Street~~ the new 18-inch water main on Avion Street that will be constructed between Vineyard Avenue and the point of connection east of the Cucamonga Channel as part of the OIAA East Avion Street Realignment project. Water would be supplied to the Air Cargo Sort Building, parking garage, and aircraft apron, for consumption as well as fire

suppression. The projected water demand for the Project site in the 2020 UWMP is sufficient to account for the water needed for the Project. The proposed Project would not require the construction of new or expanded water conveyance, treatment, or collection facilities. The impacts on water facilities during construction and operation would be less than significant, and no mitigation is required. There is no existing sewer main in Avion Street. The existing sewer main the Project will connect to is located south of Avion Street behind existing OIAA maintenance facilities. The sewer main would not be disturbed during construction of the proposed Project. Additionally, based on the available sewer line and wastewater treatment capacity, the proposed Project would not require the construction of new or expanded water conveyance, treatment, or collection facilities, and impacts would be less than significant.

Section 3.0 Project Description

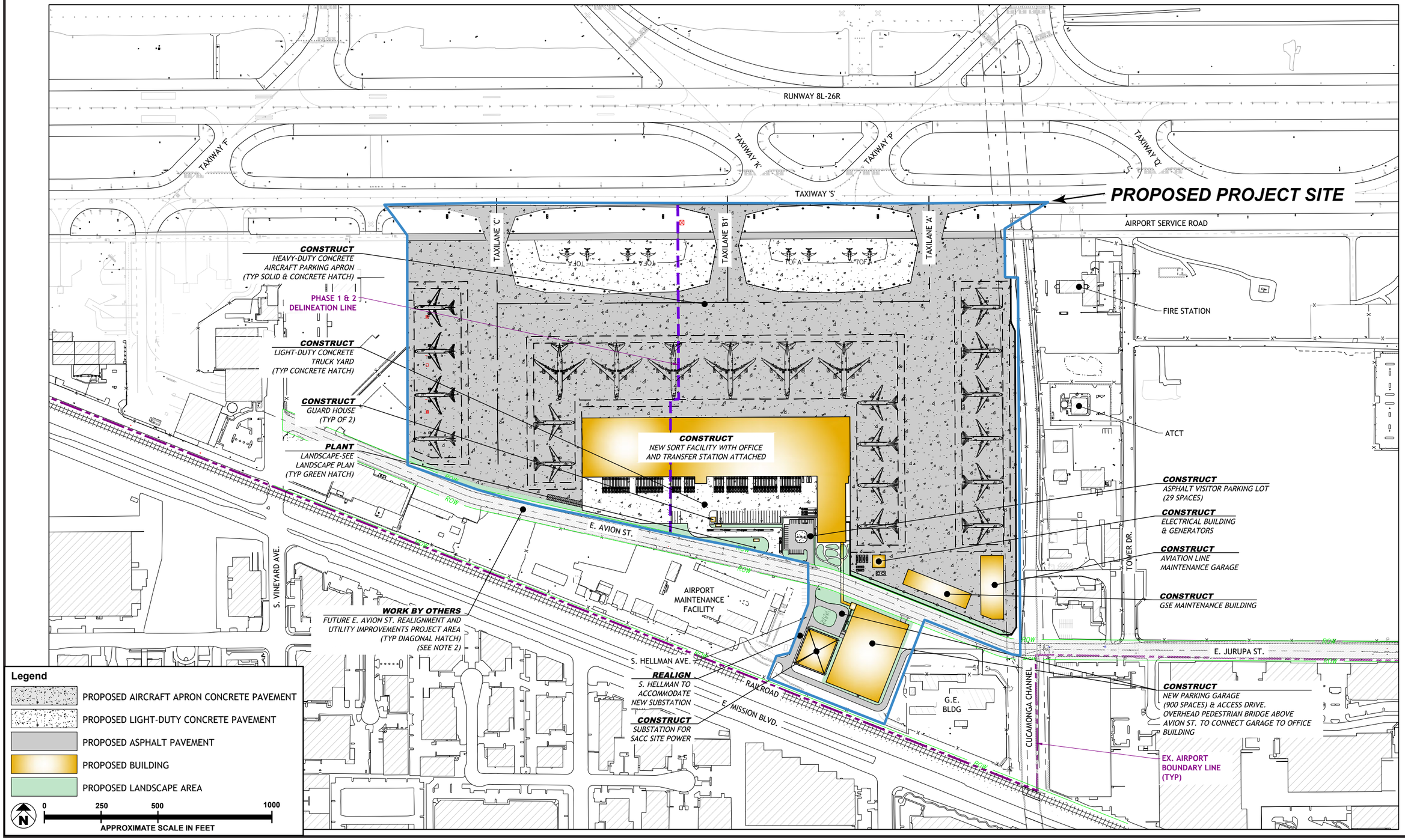
Page	Revision
3.0-20	The Draft EIR has been revised to reflect the relocation of the GSE Maintenance Building and Aviation Line Maintenance Building.

Aircraft Support Buildings

Ground Support Equipment (GSE) Maintenance Building and Aviation Line Maintenance Garage Buildings are proposed in the infield area east of the Air Cargo Sort Building and immediately north of E. Avion Street. ~~between the proposed Project aircraft taxilanes and Taxiway 'S.' Both buildings would be located outside the defined "object free area" for Taxiway 'S.'~~ Each building would be approximately 26,000 square feet. The GSE Maintenance Building would have a maximum height of 20 feet and the Aviation Line Maintenance Building would have a maximum height of 18 feet. The Aviation Line Maintenance Building would be constructed in Phase 1 and the GSE Maintenance Building would be constructed in Phase 2.

The Aviation Line Maintenance Building~~, located between Taxilane 'A' and Taxilane 'B1,~~' would provide storage of aircraft line maintenance parts and equipment including, but not limited to, aircraft wheels, tires, brakes, lights, engine oil, and hydraulic fluids. Aircraft maintenance activities would occur on the apron, where the aircraft would be parked.

The GSE Maintenance Building~~, located between Taxilane 'C' and Taxilane 'B1,'~~ would include office areas for airline support personnel and shop maintenance staff, and restroom facilities. The building would store maintenance equipment and GSE parts such as batteries, and associated waste systems and disposal facilities for each.



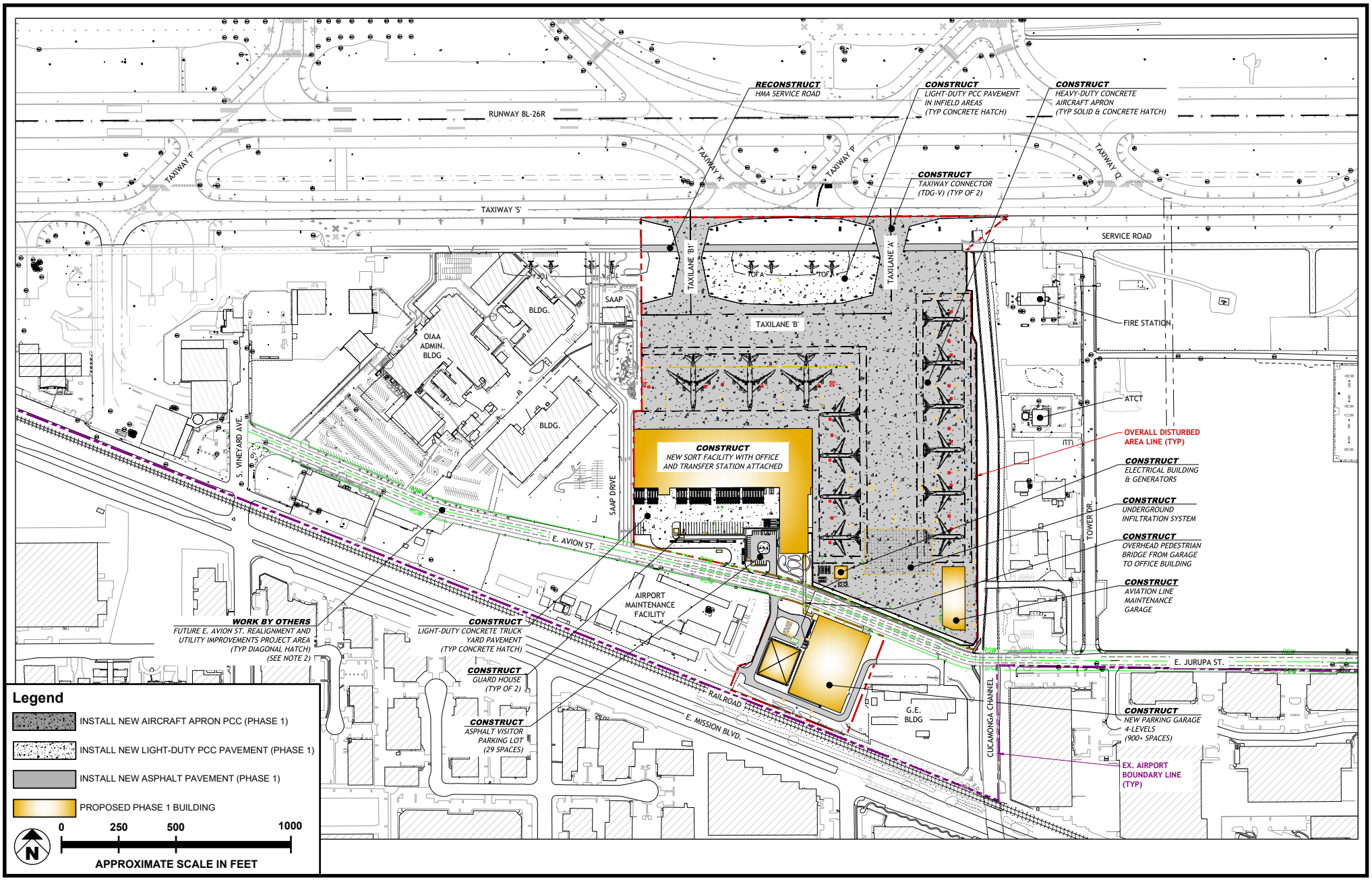
SOURCE: CHA June 2023

FIGURE **3.3**

Meridian Consultants

Site Plan

332-001-21



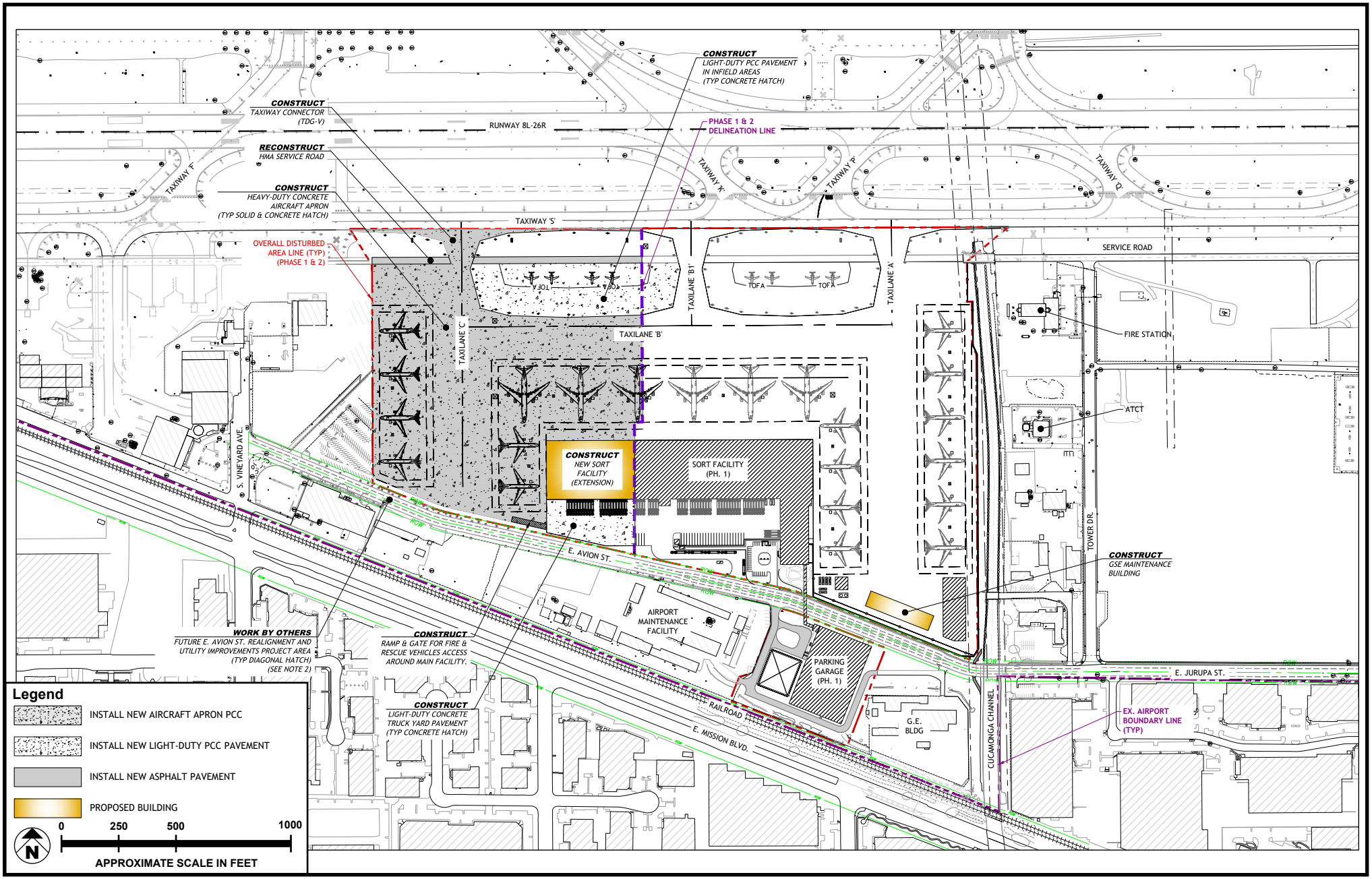
SOURCE: CHA Architecture - June 2023

FIGURE **3.13a**

Meridian Consultants

Phase 1 Plan

332-001-21



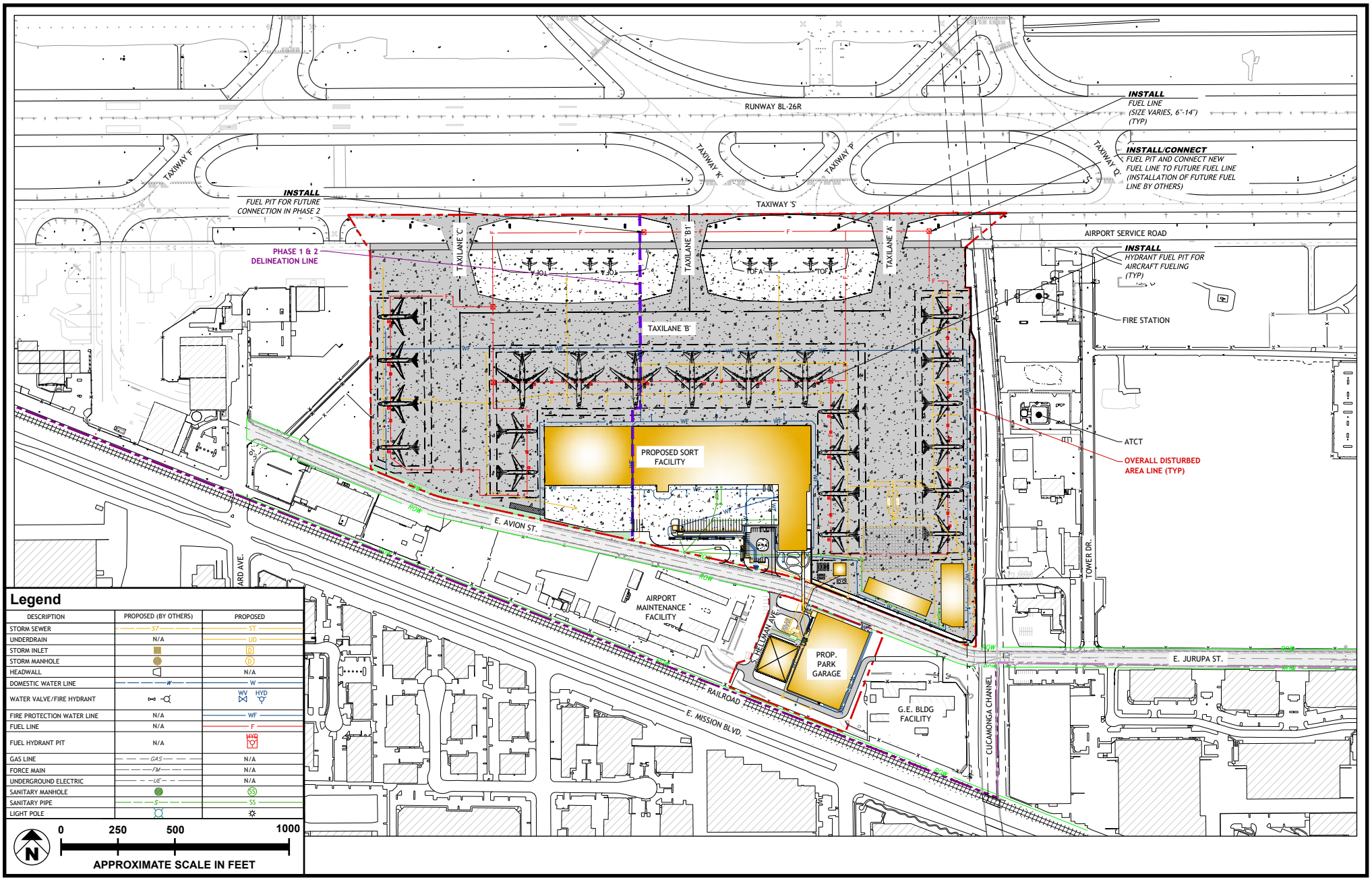
SOURCE: CHA Architecture - June 2023

FIGURE **3.13b**

Meridian Consultants

Phase 2 Plan

332-001-21



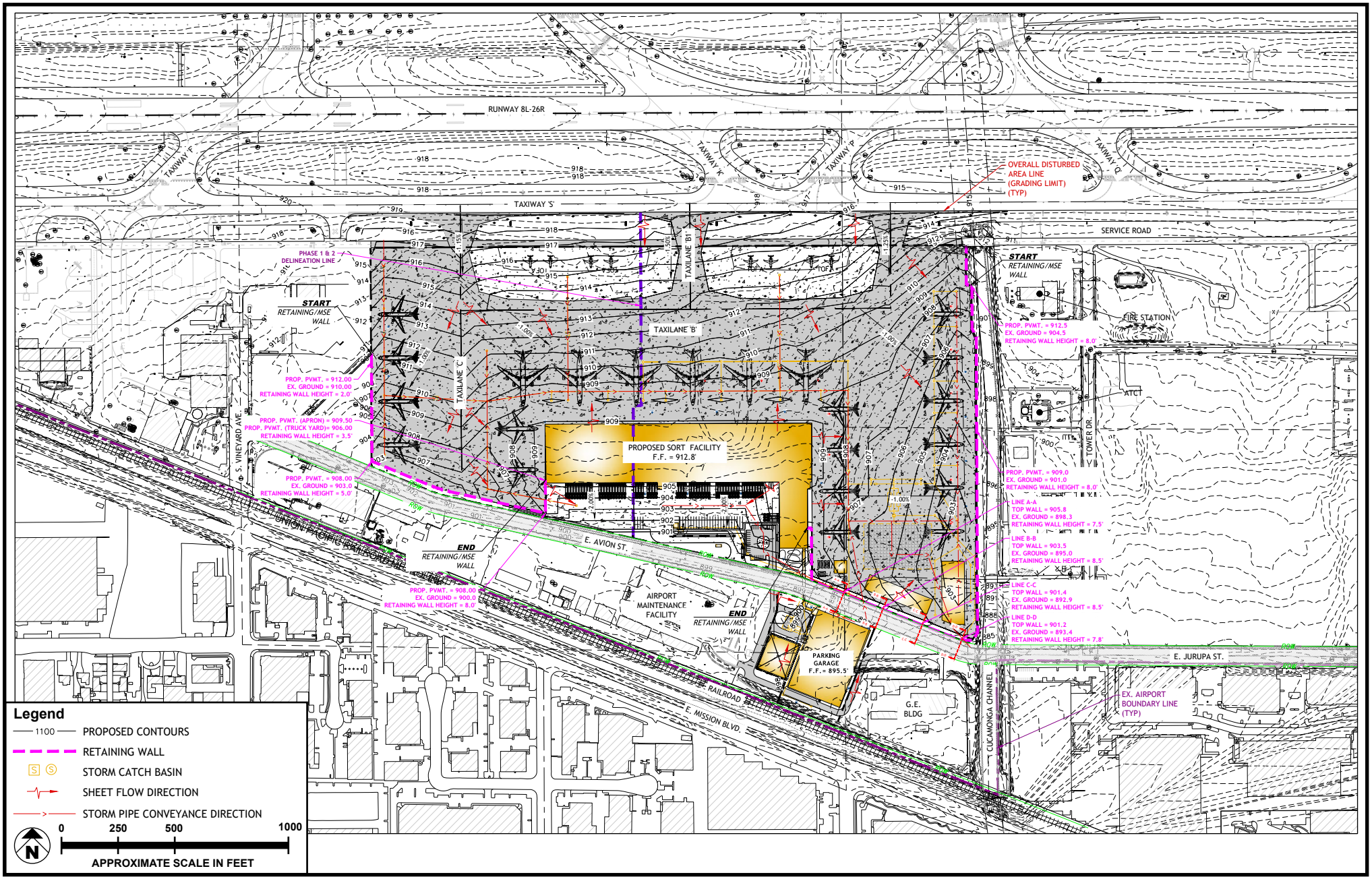
SOURCE: CHA - June 2023

FIGURE **3.14**

Aircraft Fuel System Plan

Meridian Consultants

332-001-21



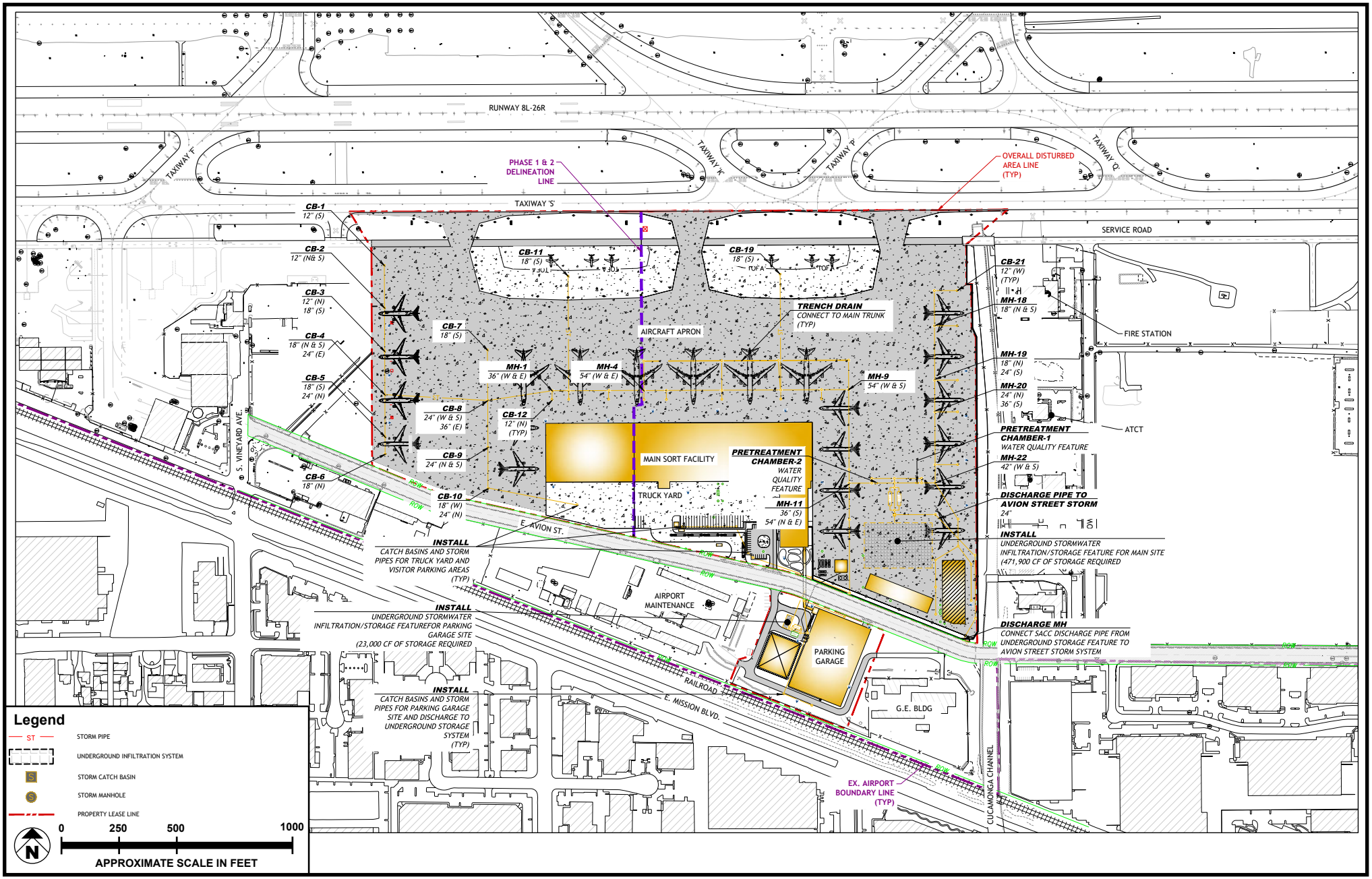
SOURCE: CHA - June 2023

FIGURE **3.15**

Meridian Consultants

Grading Plan

332-001-21



SOURCE: CHA - June 2023

FIGURE **3.16**

Meridian Consultants

Drainage Plan

332-001-21

Page Revision

3.0-28 The Draft EIR has been revised to state there is no existing potable water main in Avion Street.

Water would be provided to the Project site by the Ontario Municipal Utilities Company (OMUC). ~~The proposed Project would tie into a 16-inch water main in East Avion Street at five locations. Each connection would have a gate valve and tapping sleeve.~~ The Project would connect to a new 18-inch water main on Avion Street that will be constructed between Vineyard Avenue and the point of connection east of the Cucamonga Channel as part of the OIAA East Avion Street Realignment project.

As shown in Figure 3.17: Utility Systems Map, water would be supplied to the Air Cargo Sort Building, parking structure, and aircraft apron for consumption and fire suppression.

Two connections would occur along the southeast and southwest corners of the apron to feed water lines and hydrants along the east and west perimeters of the apron. Water lines would also connect to the Utility Substation Building, Aviation Line Maintenance Warehouse, and GSE Maintenance Building.

Page Revision

3.0-28 The Draft EIR has been revised to state there is no existing sewer main in Avion Street.

Sewer

Sanitation service would be provided by the OMUC. ~~As shown in **Figure 3.17,** one tie-in would be made to the municipal sewer line in East Avion Street, near the western limit of the Phase 1 construction area.~~ There is no existing sewer main in Avion Street. The existing sewer main the Project will connect to is located south of Avion Street behind existing OIAA maintenance facilities. The sewer main would not be disturbed during construction of the proposed Project. Near the entry of the truckyard, the sewer line would split into two separate service lines serving the Air Cargo Sort Building. An oil-water separator would be installed in the truckyard, adjacent to the Air Cargo Sort Building to separate oil and water mixtures into their separate components generated from the cargo building, as well as surface runoff in the truckyard and visitor parking lot, before entering the municipal sewer system. A sewer manhole would be installed at the fork of the two service lines per City of Ontario requirements.

Page Revision

3.0-29 The Final EIR will incorporate an increase in the amount of solar proposed on the Project site, increasing from a 1.5-Megawatt to 3.8-Megawatt Solar PV Panel System.

Power and Data/Communication

Electrical distribution would be supplied by Southern California Edison (SCE). Fiber, data, and telecommunication service would also be extended to the Project site. Concrete encased duct banks would be installed underground to provide power and data/communication to the aircraft apron and all buildings (Cargo Sorting Building, Utility Substation Building, Aviation Line Maintenance Warehouse, and GSE Maintenance Building). Medium-voltage duct banks would be separated from low-voltage and communications duct banks, which would be combined s in single runs and split into separate manhole and handholes where pull and access points would be available.

The proposed Project would include a ~~1.5~~3.8-Megawatt Solar photovoltaic (PV) Panel system on the rooftops of the Air Cargo Sorting Building and the parking garage. The proposed Project would include the use and operation of electric-powered equipment, including forklifts, loaders, tugs, ground power units, and ramp support (vans/carts) that would be stored and charged in designated areas in the Air Cargo Sort Building and aircraft apron. Moreover, the Project proposes a portion of the aircraft fleet would be electric cargo planes, and charging stations would be provided in the southeast corner of the Project site for these aircraft. Electric charging stations would also be provided in the employee and visitor parking lots, and truckyard. Phase 1 of the proposed Project would require approximately 8.5 megawatts (MW) of power at buildout. Phase 2 of the proposed Project would require approximately 2.85 MW of power at buildout. An additional 10 percent of other miscellaneous loads is needed for the proposed Project, for a total electrical demand of 12.4 MW. A new substation is being planned by SCE to meet the need for additional power for the proposed Project. This 135-foot by 160-foot proposed substation will be located within the Project site to the west of the proposed parking structure as shown in Figure 3.17. The new substation would connect to existing infrastructure along Mission Boulevard directly south of the Project site.

Page Revision

3.0-32 A footnote has been added in **Table 3.4** in the Project Description section of the Draft EIR to clarify that the inclusion of Alice Electric cargo aircraft as part of the proposed Project fleet is subject to its certification by the FAA.

TABLE 3.4
ESTIMATED MAXIMUM DAILY PROJECT OPERATIONS SCHEDULE BY AIRCRAFT TYPE[1] BY PHASE

Aircraft Type	Aircraft Design Group	Phase 1			Phase 2		
		Number of Arrivals	Number of Departures	Total Daily Operations	Number of Arrivals	Number of Departures	Total Daily Operations
B737-400	III	4	4	8	6	6	12
B747-800	VI	2	2	4	4	4	8
B767-200	IV	3	3	6	5	5	10
B767-300	IV	3	3	6	5	5	10
B777-200	V	7	7	14	10	10	20
Alice Electric[2]	N/A	3	3	6	3	3	6
Total		22	22	44	33	33	66

[1] *Each operation (i.e., arrival and departure) will occur 6 times over a 7-day week.*

Note: For purposes of modeling, the larger B747-800 aircraft was utilized. However, the B747-400 could operate on an ad hoc schedule to cover the B747-800.

[2] *The inclusion of Alice Electric cargo aircraft as part of the proposed Project fleet is subject to its certification by the FAA.*

Page Revision

3.0-37 The Draft EIR has been revised to identify additional characteristics of the proposed Project design that incorporate additional green building technologies.

3.4.4 Sustainable Project Features

The proposed Project incorporates sustainable project features in both design and operation. The Air Cargo Sort Building would meet Leadership in Energy and Environmental Design (LEED) certification standards and would be all-electric (no natural gas usage). Achieved by incorporating the following project design features:

- Enhanced Building Automation Systems

- PVC Energy systems on roof elements
- Advanced low energy HVAC systems
- Electric charging for 1/3 of employee parking spots
- Low Impact Design (LID) systems and rainwater harvesting
- All electric Ground Service Equipment (industry leading)
- In-Ground electric connections to aircraft
- Utilization of electric cargo aircrafts (Alice Aircraft by Eviation)

The Applicant's approach to building design employs a broad range of green building technologies to achieve carbon neutral design for all of its new buildings (i.e., zero emission buildings) by incorporating a variety of technologies into the building design to reduce energy use, track energy consumption to support identification of further improvements, generate renewable energy onsite, and utilize clean energy sources. To help achieve this goal, the primary Project building, the Air Cargo Sort Building incorporates all of the following technologies:

- Solar ready roof
- Solar panels (PV)
- Building automation
- Efficient, heat pump HVAC
- Natural ventilation
- Purchase of electricity from the SCE 100% Clean Rate Program, if and to the extent feasible
- Efficient dock seals
- Rapid rise doors
- Solar shades
- Low use water appliances
- Sustainable landscaping
- Submeters with advanced energy monitoring
- Main meter energy monitoring
- Efficient transformers
- Electric vehicle charging infrastructure

- Battery storage-ready infrastructure
- Building automation by enhanced building management system
- Enhanced glazing

Page Revision

3.0-38 The Draft EIR has been revised to clarify the actions taken by the OIAA to approve the Project.

TABLE 3.7 INTENDED USES OF EIR	
Public Agency	**Approvals and Decisions**
Ontario International Airport Authority	• Certify Final EIR and Adopt Mitigation Monitoring and Reporting Program • Approve the Project as described, reflected and depicted in Section 3.4 (Project Description) of the Draft EIR (including, without limitation, the Figures therein), and as may be modified in the Final EIR • Approve Facility Use Agreement • Approve Lease Agreement • Approve Notice to Proceed for Construction • Approve Air Carrier Operating Permit • Approve Operating Use and Terminal Lease Agreement
City of Ontario	• Approve Development Plan Review and Issue Building Permits • Connections to City Utilities
South Coast Air Quality Management District	• Approve Permit for Emergency Generator and Fire Pump

Section 5.2 Air Quality

Page Revision

5.2-38 References to SCAQMD Rule 2305 have been refined to clarify that the proposed Project would comply as applicable.

Among the SCAQMD rules applicable to the proposed Project are Rule 212 (Standards for Approving Permits and Issuing Public Notice), Rule 403 (Fugitive Dust), Rule 1113 (Architectural Coatings), Rule 1401 (New Source Review of Toxic Air Contaminants), Rule 2305 (WAIRE), and

Regulation XIII (New Source Review). Rule 212 states that the Executive Officer has the power to deny a Permit to Construct or Permit to Operate based on standard operating procedures and required notifications. Rule 403 requires the use of stringent best available control measures to minimize PM emissions during grading and construction activities. Rule 1113 requires reductions in the VOC content of coatings, with a substantial reduction in the VOC content limit for specified types of coatings. Rule 1401 requires limits for maximum individual cancer risk, cancer burden, and noncancer acute and chronic hazard index from new permit units, relocations, or modifications to existing permit units which emit toxic air contaminants. Rule 2305, which the proposed Project would comply with as applicable, facilitates local and regional emission reductions associated with warehouses and the mobile sources attracted to warehouses. Regulation XIII requires new on-site facility nitrogen dioxide emissions to be minimized through the use of emission control measures (e.g., use of best available control technology for new combustion such as boilers, emergency generators, and water heaters). The project design has not advanced to a level of detail that identifies specific equipment that would be subject to SCAQMD permitting. Regardless, all equipment subject to Rule 1401 and Regulation XIII will conform to all applicable requirements.

Page Revision

5.2-44 References to SCAQMD Rule 2305 have been refined to clarify that the proposed Project would comply as applicable.

- **Rule 2305 (Warehouse Indirect Source Rule)**: In May of 2021, SCAQMD adopted Rule 2305 to reduce emissions associated with warehouses and mobile sources attracted to warehouses. This rule applies to all existing and proposed warehouses over 100,000 square feet located in SCAQMD. Rule 2305 requires warehouse operators to track annual vehicle miles traveled associated with truck trips to and from the warehouse. These trip miles are used to calculate the warehouses' WAIRE (Warehouse Actions and Investments to Reduce Emissions) Points Compliance Obligation. WAIRE Points are earned based on emission reduction measures and warehouse operators are required to submit an annual WAIRE Report which includes truck trip data and emission reduction measures. Reduction strategies listed in the WAIRE menu include acquire zero emission (ZE) or near zero emission (NZE) trucks; require ZE/NZE truck visits; require ZE yard trucks; install on-site ZE charging/fueling infrastructure; install on-site energy systems; and install filtration systems in residences, schools, and other buildings in the adjacent community. Warehouse operators that do not earn enough WAIRE points to satisfy the WAIRE Points Compliance Obligation are required to pay a mitigation fee. This Proposed Project

would comply with the adopted Rule 2305 (Warehouse Indirect Source Rule) as applicable.

Page Revision

5.2-59 Air quality analysis related to taxi times have been clarified.

~~Notably, t~~The proposed Project would cause a minor increase in aircraft the taxi-in times and taxi-out times associated with non-project aircraft operations. ~~This is a result of the greater number of aircraft operations which decreases airfield taxi efficiency.~~ Therefore, the air quality analysis includes the impacts due to project-related and non-project related aircraft operations.

Page Revision

5.2-63 PDF AQ-1 has been updated to include use of off road-construction equipment that is zero emission, where available.

5.2.3.3 Project Design Features

Construction

The following project design features (PDFs) would be implemented during construction activities to reduce emissions and are quantified within the air quality analysis:

PDF AQ-1: For all phases of construction activity, ~~T~~the Applicant shall require use of off-road construction equipment that is zero emission, if and to the extent available, or diesel-fueled off-road construction equipment that meets the USEPA's Tier 4 emissions standards for off-road diesel-powered construction equipment with 50 horsepower (hp) or greater~~, for all phases of construction activity~~. To ensure that Tier 4 or the cleanest construction equipment available would be used during the Project's construction, the OIAA shall confirm that the Applicant includes this requirement in applicable bid documents, purchase orders, and contracts. Additionally, the OIAA shall confirm that the Applicant also requires periodic reporting and provision of written construction documents by construction contractor(s) and conducts regular inspections to the maximum extent feasible to ensure and enforce compliance.

Page Revision

5.2-65 Three new PDFs have been added in the Final EIR: (PDF AQ-9) to include Project design specifications and technologies; (PDF AQ-10) state the proposed Project would provide electric charging infrastructure in the truckyard; and (PDF AQ-11) the storage and maintenance of trucks would occur only on-site.

Moreover, additional PDFs not quantified within the air quality analysis include:

PDF AQ-7: The Air Cargo Sort Building shall meet Leadership in Energy and Environmental Design (LEED) certification standards, shall include enhanced building automation systems, and shall utilize advanced low energy HVAC systems.

PDF AQ-8: The visitor parking lot shall include 29 parking stalls, 6 of which shall have access to electric charging points. The employee parking structure shall include 932 parking stalls, 300 of which shall have access to electric charging points.

PDF AQ-9: The Air Cargo Sort Building shall incorporate all of the following design specifications and technologies:

- Building automation
- Efficient, heat pump HVAC
- Natural ventilation
- Purchase of electricity from the SCE 100% Clean Rate Program, if and to the extent feasible
- Efficient dock seals
- Rapid rise doors
- Solar shades
- Low use water appliances
- Sustainable, drought-tolerant landscaping featuring a native, non-invasive vegetation palette
- Submeters with advanced energy monitoring
- Main meter energy monitoring
- Efficient transformers
- Battery storage-ready infrastructure
- Building automation, enhanced building management system
- Enhanced glazing

PDF AQ-10: The Project shall include electric charging infrastructure in the truckyard that, at a minimum, accords with all applicable requirements of California's Building Energy Efficiency Standards, as set forth within Title 24, Part 6, of the California Code of Regulations.

PDF AQ-11: The storage and maintenance of Project-related delivery trucks would occur only on-site. In the event that overnight parking of delivery trucks is necessary, such trucks shall be parked within the Project site.

Page	Revision
5.2-90	Revisions to mitigation measures and additional mitigation measures have been included in response to the SCAQMD comment letter dated April 25, 2023.

MM AQ-5: The Applicant shall require, ~~where~~ if and to the extent feasible, the use of zero-emission or near zero emission on-road heavy duty~~Project-related delivery~~ trucks as part of business operations beginning in 2025 (within at least 25 percent of the Project fleet).

The Applicant also shall require, ~~where~~ if and to the extent feasible, the use of zero-emission or near zero emission on-road heavy duty~~Project-related delivery~~ trucks as part of the business operations beginning in 2029 (within at least 50 percent of the Project fleet).

MM AQ-6: The Applicant shall include in the design requirements for the Project, ~~that a~~ cool roof ~~be installed~~ installation to the extent roof space is not occupied by solar panels, in order~~at the parking structure~~ to reduce energy use and urban heat island effects. ~~This requirement shall not apply if solar panels are installed on the parking structure.~~

MM AQ-7: The Applicant shall encourage the use of single engine taxi operations for Project aircraft.

MM AQ-8: The Applicant shall utilize Energy Star heating, cooling, and lighting devices, and appliances (e.g., Heating, Ventilation, and Air Conditioning (HVAC) units in the form of energy efficient commercial heat pumps) within the interior of the Air Cargo Sort Building..

MM AQ-9: In order to reduce trips to and from the Project site during construction, the Applicant shall provide on-site food trucks during meal times.

MM AQ-10: Interior- and exterior-facing signs, including signs directed toward all dock and delivery areas, shall be posted by the Applicant to identify contact information to report idling violations to CARB, SCAQMD, and the building manager. These signs also shall inform truck drivers to shut off their engines when not in use.

MM AQ-11: Electric plugs for electric transport refrigeration units shall be provided at dock doors located at the Air Cargo Sort Building.

MM AQ-12: The Applicant shall train operational managers and employees on efficient scheduling and load management to eliminate unnecessary queuing of trucks.

MM AQ-13: Signs shall be posted by the Applicant at every truck exit driveway providing directional information to use truck routes as designated by the City of Ontario.

MM AQ-14: The Applicant shall require its facility operator(s) to train the staff in charge of keeping vehicle records on diesel technologies and compliance with CARB regulations by attending CARB-approved courses. Also, the Applicant shall require its facility operator(s) to maintain records on-site demonstrating regulatory compliance and make records available for inspection by OIAA, SCAQMD, and State of California upon request.

MM AQ-15: The Applicant shall include a provision in all operational freight hauling contracts requiring the use of 2010 model year trucks that meet CARB's 2010 engine emission standards, or newer and cleaner trucks, if and to the extent feasible.

MM AQ-16: During construction, the Applicant shall post interior- and exterior-facing signs to inform construction contractors to shut off truck and equipment engines when not in use.

Section 5.3 Biological Resources

Page	Revision
5.3-20; 5.3-51	The following mitigation measure is incorporated to require pre-construction bat roosting surveys to confirm no maternity roosts are established and present on the site prior to construction.

MM BIO-3: **Roosting Bats.** A pre-construction bat roosting survey shall be conducted on structures and ornamental tree species on site that may provide suitable roosting opportunities for local common bat species within 14 days prior to construction.

Section 5.7 Greenhouse Gas Emissions

Page Revision

5.7-34 The Final EIR incorporates all air quality PDFs, including three new PDFs, in Section 5.7 Greenhouse Gas Emissions.

PDF AQ-1: For all phases of construction activity, the Applicant shall require use of off road construction equipment that is zero emission, if and to the extent available, or diesel-fueled off-road construction equipment that meets the USEPA's Tier 4 emissions standards for off-road diesel-powered construction equipment with 50 horsepower (hp) or greater. To ensure that Tier 4 or the cleanest construction equipment available would be used during the Project's construction, the OIAA shall confirm that the Applicant includes this requirement in applicable bid documents, purchase orders, and contracts. Additionally, the OIAA shall confirm that the Applicant also requires periodic reporting and provision of written construction documents by construction contractor(s) and conducts regular inspections to the maximum extent feasible to ensure and enforce compliance.

PDF AQ-6: The Applicant shall conduct maintenance and/or testing on each of the seven standby generators on separate days to limit daily emissions from maintenance/testing activities.

PDF AQ-7: The Air Cargo Sort Building shall meet Leadership in Energy and Environmental Design (LEED) certification standards, shall include enhanced building automation systems, and shall utilize advanced low energy HVAC systems.

PDF AQ-8: The visitor parking lot shall include 29 parking stalls, 6 of which shall have access to electric charging points. The employee parking structure shall include 932 parking stalls, 300 of which shall have access to electric charging points.

PDF AQ-9: The Air Cargo Sort Building shall incorporate all of the following design specifications and technologies:

- Building automation
- Efficient, heat pump HVAC

- Natural ventilation
- Purchase of electricity from the SCE 100% Clean Rate Program, if and to the extent feasible
- Efficient dock seals
- Rapid rise doors
- Solar shades
- Low use water appliances
- Sustainable, drought-tolerant landscaping featuring a native, non-invasive vegetation palette
- Submeters with advanced energy monitoring
- Main meter energy monitoring
- Efficient transformers
- Battery storage-ready infrastructure
- Building automation by an enhanced building management system
- Enhanced glazing

PDF AQ-10: The Project shall include electric charging infrastructure in the truckyard that, at a minimum, accords with all requirements of California's Building Energy Efficiency Standards, as set forth in Title 24, Part 6, of the California Code of Regulations.

PDF AQ-11: The storage and maintenance of Project-related delivery trucks shall occur only on-site. In the event that overnight parking of delivery trucks is necessary, such trucks shall be parked within the Project site.

5.7-34 The Final EIR incorporates an increase in the amount of solar proposed on the Project site, increasing from a 1.5-Megawatt to 3.8-Megawatt Solar PV Panel System.

PDF GHG-2: The proposed Project shall include a ~~1.5~~3.8-Megawatt Solar PV Panel System on the rooftop of the Air Cargo Sort Building and Parking Structure.

Page	Revision

5.7-39 The Final EIR will incorporate an increase in the amount of solar proposed on the Project site, increasing from a 1.5-Megawatt to 3.8-Megawatt Solar PV Panel System.

TABLE 5.7-7 PROPOSED PROJECT CONSISTENCY WITH PLANS, POLICIES, AND REGULATIONS ADOPTED TO REDUCE GREENHOUSE GAS EMISSIONS			
Regulatory Framework	**Plan, Policy, or Regulation**	**Project's Relationship**	**Is the Project in Conflict with Plan, Policy, or Regulation?**
State			
Title 24 Energy Standards	Ensures new and existing buildings achieve energy efficiency.	As a matter of regulatory compliance, the proposed Project would comply with applicable provisions of the Title 24 Energy Standards. Further, as discussed previously, the proposed Project incorporates sustainable project design features and technology in both design and operation. The Air Cargo Sort Building would meet LEED certification standards and would be all-electric (no natural gas usage). A ~~1.5~~3.8-Megawatt Solar PV Panel system also would be installed on the rooftop of the Cargo Sorting Building and the parking structure.	No

Page	Revision
5.7-46	Revisions to mitigation measures and additional mitigation measures have been included in response to the SCAQMD comment letter dated April 25, 2023.

5.7.6 MITIGATION MEASURES

As discussed above, GHG emissions from the proposed Project would result in an increase over Baseline Conditions during Phase 1 and Phase 2. As also indicated in **Table 5.7-6**, the majority (i.e., over 75 percent) of the GHG emissions associated with future operation of the proposed Project are related to aircraft sources (i.e., aircraft, APU, and GSE). The Airport does not have authority to regulate aircraft operations or emissions from aircraft engines as aircraft are a federal source regulated by the USEPA. **Section 5.2: Air Quality**, includes **Mitigation Measures AQ-1** through **AQ-~~7~~16**, and **Section 5.12: Transportation**, includes **Mitigation Measures TRANS-1** through **TRANS-5**, which would also serve to reduce GHG emissions.

MM AQ-1: The Applicant shall require that construction vendors, contractors, and/or haul truck operators commit to using 2010 model year trucks (e.g., material delivery trucks and soil import/export with a gross vehicle weight rating of at least 14,001 pounds), that meet CARB's 2010 engine emissions standards or newer, cleaner trucks. The OIAA shall confirm that the Applicant includes this requirement in applicable bid documents, purchase orders, and contracts. Operators shall maintain records of all trucks associated with Project construction to document that each truck used meets these emission standards and make the records available for inspection.

MM AQ-2: The Applicant shall require that construction equipment such as concrete/industrial saws, pumps, aerial lifts, light stands, air compressors, and forklifts be electric or alternative-fueled (i.e., non-diesel), where feasible. Pole power shall be utilized at the earliest feasible point in time and shall be used to the maximum extent feasible in lieu of generators.

MM AQ-3: The Applicant shall support and encourage ridesharing and transit incentives for the construction crew by providing crews with the needed resources to organize rideshares, such as bulletin boards or email announcements. The Applicant also shall partially subsidize transit fares or passes for the construction crew members who can feasibly use transit. The Applicant shall set a goal to achieve ten percent total construction worker participation in ridesharing programs and transit use.

MM AQ-4: The Applicant shall require, in addition the GSE noted within **PDF AQ-3**, all other on-site cargo-handling equipment, such as yard trucks, holsters, yard goats, pallet jacks, and similar equipment, to be electric, with the necessary electrical charging stations provided.

MM AQ-5: The Applicant shall require, ~~where~~ if and to the extent feasible, the use of zero-emission or near zero emission on-road heavy duty~~Project-related delivery~~ trucks as part of business operations beginning in 2025 (within at least 25 percent of the Project fleet).

The Applicant also shall require, ~~where~~ if and to the extent feasible, the use of zero-emission or near zero emission on-road heavy duty~~Project-related delivery~~ trucks as part of the business operations beginning in 2029 (within at least 50 percent of the Project fleet).

MM AQ-6: The Applicant shall include in the design requirements for the Project, ~~that a~~ cool roof ~~be installed~~ installation to the extent roof space is not occupied by solar panels, in order~~at the parking structure~~ to reduce energy use and urban heat island effects. ~~This requirement shall not apply if solar panels are installed on the parking structure.~~

MM AQ-7: The Applicant shall encourage the use of single engine taxi operations for Project aircraft.

MM AQ-8: The Applicant shall utilize Energy Star heating, cooling, and lighting devices, and appliances (e.g., Heating, Ventilation, and Air Conditioning (HVAC) units in the form of energy efficient commercial heat pumps) within the interior of the Air Cargo Sort Building.

MM AQ-9: In order to reduce trips to and from the Project site during construction, the Applicant shall provide on-site food trucks during meal times.

MM AQ-10: Interior- and exterior-facing signs, including signs directed toward all dock and delivery areas, shall be posted by the Applicant to identify contact information to report idling violations to CARB, SCAQMD, and the building manager. These signs also shall inform truck drivers to shut off their engines when not in use.

MM AQ-11: Electric plugs for electric transport refrigeration units shall be provided at dock doors located at the Air Cargo Sort Building.

MM AQ-12: The Applicant shall train operational managers and employees on efficient scheduling and load management to eliminate unnecessary queuing of trucks.

MM AQ-13: Signs shall be posted by the Applicant at every truck exit driveway providing directional information to use truck routes as designated by the City of Ontario.

MM AQ-14: The Applicant shall require its facility operator(s) to train the staff in charge of keeping vehicle records on diesel technologies and compliance with CARB regulations by attending CARB-approved courses. Also, the Applicant shall require its facility operator(s) to maintain records on-site demonstrating regulatory compliance and make records available for inspection by OIAA, SCAQMD, and State of California upon request.

MM AQ-15: The Applicant shall include a provision in all operational freight hauling contracts requiring the use of 2010 model year trucks that meet CARB's 2010 engine emission standards, or newer and cleaner trucks, if and to the extent feasible.

MM AQ-16: During construction, the Applicant shall post interior- and exterior-facing signs to inform construction contractors to shut off truck and equipment engines when not in use.

Section 5.8 Hazards and Hazardous Materials

Page	Revision
5.8-19	**Figure 5.8-2: Ontario Airport Safety Zones** has been updated to be consistent with the 2018 ALUCP Amendment.

Legend

Boundary Lines

- Airport Property Line
- County Line
- City Limits
- Street
- Existing Runways — Runway 8L-26R

Safety Zones

No Project [2]

Notes

1. Generic Large Air Carrier Safety Zones source: California Airport Land Use Planning Handbook (January 2002). The generic safety zones translate nationwide aircraft accident distribution pattern data into a set of distinct zones with regular geometric shapes and sizes. These safety zones are shown for both the existing and ultimate runway configurations.

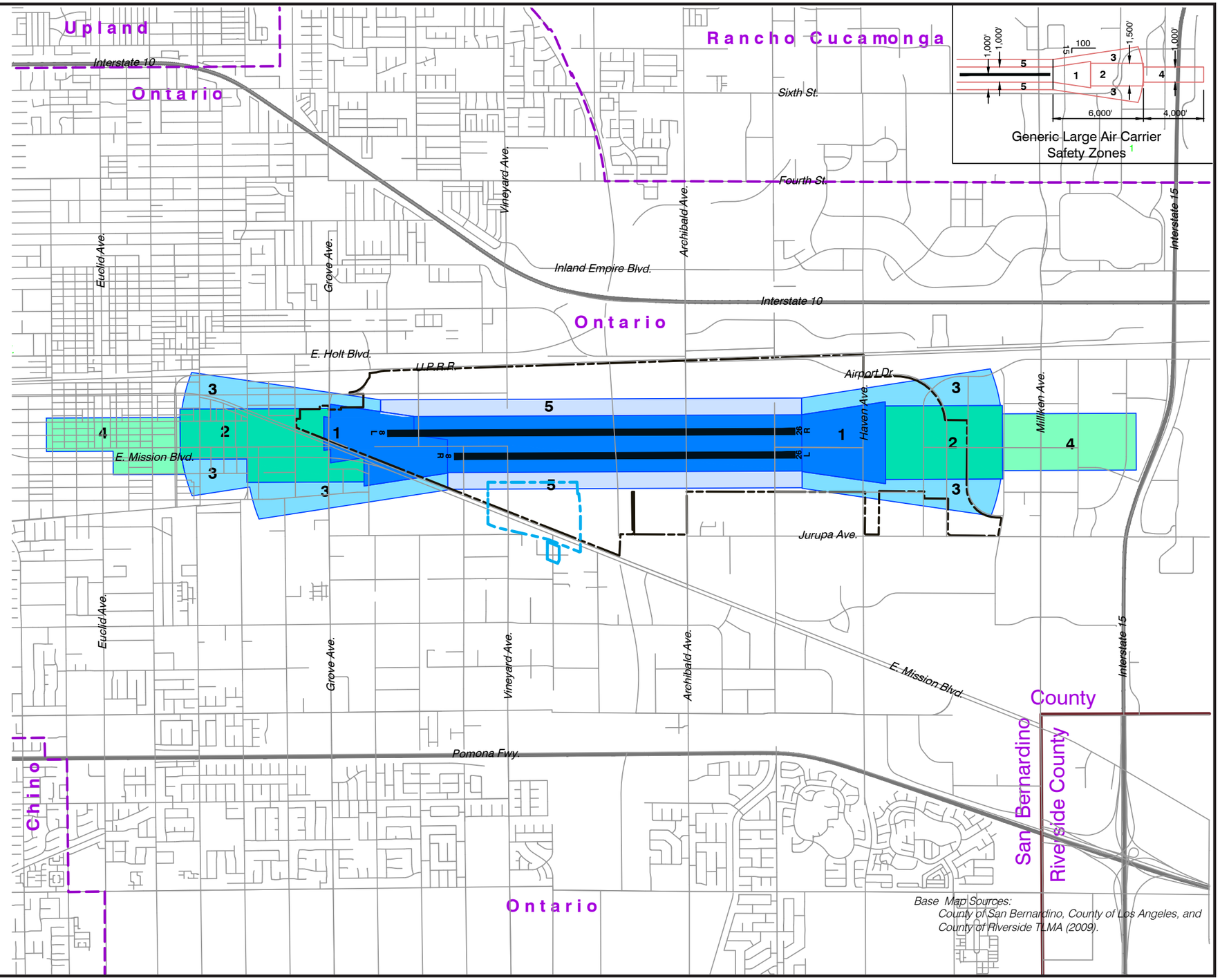
2. The "No Project" forecast assumes that aircraft activity would be constrained due to the current airfield configuration.

3. Adjusted Zone 1 to match runway protection zones (RPZ) as follows:

   Existing

   - Runway 8L Approach: 1,000' x 2,500' x 1,750' — RPZ begins 200' from displaced threshold
   - Runway 8L Departure: 500' x 1,700' x 1,010'
   - Runway 26R: 1,000' x 2,500' x 1,750'
   - Runway 8R: 1,000' x 2,500' x 1,750'
   - Runway 26L: 1,000' x 2,500' x 1,750'

   RPZ begins 200' from runway ends



Legend

- Project Site

0 1500 3000 6000

APPROXIMATE SCALE IN FEET

SOURCE: Mead&Hunt - 2022

FIGURE **5.8-2**

Meridian Consultants

Ontario Airport Safety Zones

332-001-21

Section 5.9 Hydrology

Page Revision

5.9-1 The Final EIR will remove mention of the need to approve a PWQMP for the proposed Project for compliance with Santa Ana Regional Water Quality Control Board Order Number R8-2010-0036 since all stormwater from the Project site would be discharged to the drain to be installed as part of the East Avion Street Realignment project (Related Project F in the Draft EIR). As Avion Street is a private street approval from San Bernardino County Flood Control District (SBCFCD) is needed, not a PWQMP.

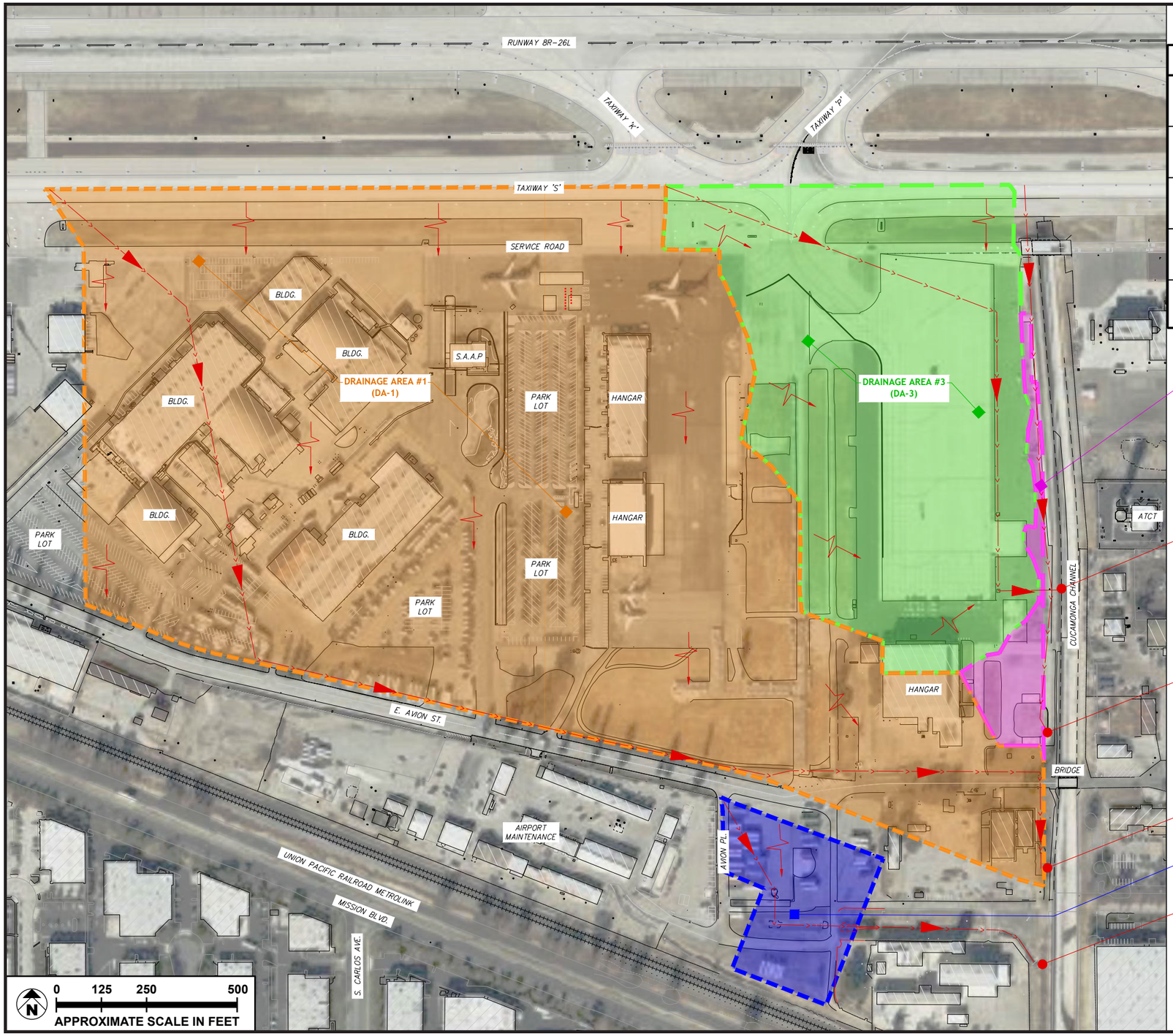
5.9.1 INTRODUCTION

This section of the DEIR evaluates the potential impacts of the proposed Project on hydrology and water quality conditions within the vicinity of the Ontario International Airport (Airport) which is located within the City of Ontario (City). Hydrology is the scientific study of the distribution and circulation of water, both on land and underground. Water quality deals with the quality of surface and groundwater with regard to the amount of suspended solids, presence and concentrations of contaminants, bacteria levels, and concentration of dissolved oxygen. The analysis in this section is based in part on the following technical reports and information:

- CHA. *South Airport Cargo Center at Ontario International Airport – Preliminary Hydrology Study for CEQA Submission*. January 31, 2022 (Updated December 2022). (See **Appendix 5.9-1.**)
- City of Ontario Engineering Department. *Preliminary Water Quality Management Plan* (PWQMP). ~~For compliance with Santa Ana Regional Water Quality Control Board Order Number R8-2010-0036 (NPDES Permit No. CAS618036)~~ For South Airport Cargo Center. (See **Appendix 5.9-2.**)
- Meridian Consultants, LLC. *Water Supply Assessment (WSA) Ontario South Airport Cargo Center Project*. July 2022. (See **Appendix 5.9-3.**)
- Guida Surveying Inc. ALTA/NSPS Land Title Survey SACC Ontario International Airport. November 2021. (See **Appendix 5.9-4.**)

Page Revision

5.9-10 **Figure 5.9-2: Existing Drainage Areas** has been added to the Final EIR.



LEGEND

DESCRIPTION	
DRAINAGE AREA #1	
DRAINAGE AREA #2	
DRAINAGE AREA #3	
DRAINAGE AREA #4	
FLOW PATH	

DRAINAGE AREA #2 (DA-2)

DRAINAGE AREA #3 DISCHARGE POINT INTO THE CHANNEL

DRAINAGE AREA #2 DISCHARGE POINT INTO THE CHANNEL

DRAINAGE AREA #1 DISCHARGE POINT INTO THE CHANNEL

DRAINAGE AREA #4 (DA-4)

DRAINAGE AREA #4 DISCHARGE POINT INTO THE CHANNEL

SOURCE: CHA – December 2022

FIGURE **5.9-2**

Meridian Consultants

Existing Drainage Areas

332-001-21

Page Revision

5.9-10 The Final EIR will add that all stormwater from the Project site would be discharged to the drain to be installed as part of the East Avion Street Realignment project (Related Project F in the Draft EIR).

The proposed Project site contains four existing drainage areas, each with a different flow path.[1] Drainage Area #1 (DA-1) is the largest drainage area consisting of the entire western half of the proposed Project site and a portion of the eastern half. This area generally conveys stormwater in a northwest to southeast direction. As water flows southeast, it eventually flows across East Avion Street to a small swale adjacent to the Cucamonga Channel. This swale eventually overtops the western wall of Cucamonga Channel near the abandoned buildings south of E. Avion Street. Drainage Area #2 (DA-2) generally conveys stormwater via a small swale in a north to south direction adjacent to the Cucamonga Channel from Taxiway 'S' to East Avion Street. Drainage Area #3 (DA-3) is between DA-1 and DA-2 and consists mostly of the existing airfield apron area. This area generally conveys stormwater on the airfield apron pavement from Taxiway 'S' to four different stormwater catch basins located on the east side of the apron. Drainage Area #4 (DA-4) is located south of E. Avion Street adjacent to Avion Place. ~~Stormwater sheet flows to a collection area and is conveyed westward to the Cucamonga Channel through a series of culverts.~~ All stormwater from the Project site would be discharged to the drain to be installed as part of the East Avion Street Realignment project (Related Project F in the Draft EIR). No stormwater from the Project site would flow directly into the Cucamonga Channel. The proposed Project runoff would enter the Cucamonga Channel via Avion Street, which is a private street.

Page Revision

5.9-16 The Final EIR will remove mention of the PWQMP since all stormwater from the Project site would be discharged to the drain to be installed as part of the East Avion Street Realignment project (Related Project F in the Draft EIR). As Avion Street is a private street, approval from San Bernardino County Flood Control District (SBCFCD) is needed, not a PWQMP.

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1 CHA. *South Airport Cargo Center at Ontario International Airport – Preliminary Hydrology Study for CEQA Submission*. January 31, 2022. Updated December 2022. (See Appendix 5.9-1.)

Local

City of Ontario

The City adopted a Preliminary Water Quality Management Plan (PWQMP) to implement the MS4 permit, which requires, as needed on a project-by-project basis, the integration stormwater management, water conservation, rainwater harvesting and re-use, and flood management to meet water quality standards. However, the Project site would discharge to the storm drain planned as part of the East Avion Street Realignment project (Related Project F). The Project site would not directly discharge into the Cucamonga Channel. As Avion Street is a private street, approval from San Bernardino County Flood Control District (SBCFCD) is needed, not a PWQMP. ~~The San Bernardino County MS4 Permit requires project-specific Water Quality Management Plans (WQMP) to be prepared for all priority new development and significant redevelopment projects as specified in the City's PWQMP.~~

Page Revision

5.9-19 – 5.9-20 The Final EIR will remove mention of the PWQMP since all stormwater from the Project site would be discharged to the drain to be installed as part of the East Avion Street Realignment project (Related Project F in the Draft EIR). As Avion Street is a private street, approval from San Bernardino County Flood Control District (SBCFCD) is needed, not a PWQMP.

Design and Construction Handbook – Stormwater Pollution Prevention Plan (SWPPP)

The OIAA Design and Construction Handbook has been established to standardize OIAA processes.[2] OIAA maintains a NPDES permit to comply with federal regulations requiring transportation facilities with discharges from vehicle maintenance shops, equipment cleaning operations, or airport de-icing to be covered under an industrial permit. The City is a Co-Permittee of the San Bernardino County Flood Control District (SBCFCD), which manages the NPDES Permit for the San Bernardino County. The San Bernardino County NPDES Permit,

2 Ontario International Airport Authority (OIAA). *Design and Construction Handbook*. January 2019. https://www.flyontario.com/sites/default/files/oiaa_design_construction_handbook_final_january_2019_0.pdf. Accessed February 2022.

otherwise known as the San Bernardino County MS4 Permit, requires all priority projects[3] to complete the following:

- WQMP in compliance with the regional MS4 Permit and Statewide General Construction Permit.
- SWPPP in compliance with the regional MS4 Permit and Statewide General Construction Permit.

Since the Project site would discharge to the storm drain planned as part of the East Avion Street Realignment project (Related Project F), which is a private street and would not directly discharge into the Cucamonga Channel, a PWQMP is not required to be submitted and approved. ~~The MS4 Permit stipulates that the City require priority project applicants to submit a Preliminary project-specific WQMP, as early as possible, during the environmental review or planning phase of a development project and that the PWQMP be approved prior to the issuance of land use entitlement.~~ As such, the SWPPP, erosion control plan (which would be required prior to construction), and approval by the SBCFCD ~~the required plans listed above are to~~ would be required to be completed by ~~all priority projects~~ the Project Applicant.

Page Revision

5.9-22 The Final EIR will remove mention of the PWQMP since all stormwater from the Project site would be discharged to the drain to be installed as part of the East Avion Street Realignment project (Related Project F in the Draft EIR). As Avion Street is a private street, approval from San Bernardino County Flood Control District (SBCFCD) is needed, not a PWQMP.

To implement the San Bernardino County MS4 Permit issued by the Santa Ana RWQCB, the Project requires approval from the SBCFCD for discharging into the Cucamonga Channel. ~~the City maintains a PWQMP requirement in order for qualifying projects to plan for the integration of required water quality elements, stormwater management, water conservation, rainwater harvesting and re-use, and flood management.[4] As such, PWQMPs, are in compliance with the Santa Ana RWQCB and the San Bernardino County MS4 Permit. The San Bernardino County MS4 Permit requires project-specific WQMPs to be prepared for all priority new development~~

3 OIAA. *Design and Construction Handbook*.

4 City of Ontario. *Preliminary Water Quality Management Plan*. https://www.ontarioca.gov/sites/default/files/Ontario-Files/Engineering/environmental-services/preliminary_wqmp_s.pdf. Accessed June 2022.

~~and significant redevelopment projects specified in the City's PWQMP. The proposed Project qualifies as a "significant re-development project" according to the City's PWQMP, as the proposed Project would add or replace 5,000 or more square feet of impervious surface on an already developed site subject to discretionary approval of the Permittee.[5] The MS4 Permit stipulates that the City requires priority project applicants to submit a preliminary, project-specific WQMP, as early as possible, during the environmental review or planning phase of a development project and that the PWQMP be approved prior to the issuance of land use entitlement.~~ The ~~PWQMP for the~~ proposed Project contains ~~required~~ site design/Low-Impact Design (LID) BMPs, source control BMPs, and treatment control BMPs. ~~The PWQMP requires projects to implement site design/LID BMPs utilizing either infiltration, harvest and use, evapotranspiration, or bio-treatment designs depending on the project.~~ The Project proposes infiltration Site Design/LID BMPs as well as treatment control BMPs ~~are~~ designed to control stormwater pollutants where it is not feasible to install site design/LID BMPs or where pretreatment of stormwater runoff is required, ahead of infiltration BMPs. The proposed Project would implement a gravity separator device for pretreatment of sediment, trash/litter, or oil and grease, to improve integration of required water quality elements (see **Appendix 5.9-2**). BMPs for both construction and operation are shown in **Table 5.9-3: ~~PWQMP~~ BMPs**, below.

Page	Revision
5.9-23	The BMPs listed in Table 5.9-3 were updated to reference Appendix 5.9-2 as the source and remove the City.

TABLE 5.9-3
~~PWQMP~~ BMPS

Site Design/LID BMPs
• Grade parking lot areas/drive aisles/roof drains to sheet flow runoff into landscaped swales, via curb cuts or zero-face curbs or otherwise disconnect direct drainage from MS4.
• Install surface retention basins or infiltration trenches to receive impervious area runoff.
• Install underground stormwater retention chambers where downstream landscaped areas are limited.
• Construct streets, sidewalks, and parking lot stalls to the minimum widths necessary.

5 City of Ontario. *Preliminary Water Quality Management Plan*. (See **Appendix 5.9-2.**)

TABLE 5.9-3 ~~PWQMP~~ BMPS
Site Design/LID BMPs
Source Control BMPs
• Minimize trash and debris in storm runoff through a regular parking lot, storage yard and roadway sweeping program.
• Site Owner(s)/Property Manager/HOA or POA will be familiar with the project WQMP and stormwater BMPs.
• Owner or HOA or POA to provide Education/Training of site occupants and employees on stormwater BMPs.
• Install stormwater placards/stenciled messages with a "No Dumping" message on all on-site/off-site storm drain inlets.
Treatment Control BMP
• Gravity Separator devices for pretreatment of sediment, trash/litter, or Oil & Grease

Source: ~~City of Ontario Engineering Department. *Preliminary Water Quality Management Plan (PWQMP)* For compliance with Santa Ana Regional Water Quality Control Board Order Number R8-2010-0036 (NPDES Permit No. CAS618036) for South Airport Cargo Center (s~~See **Appendix 5.9-2**~~)~~.

Page Revision

5.9-25 The Final EIR will remove mention of the PWQMP since all stormwater from the Project site would be discharged to the drain to be installed as part of the East Avion Street Realignment project (Related Project F in the Draft EIR). As Avion Street is a private street, approval from San Bernardino County Flood Control District (SBCFCD) is needed, not a PWQMP.

Submittal and implementation of the ~~PWQMP, SWPPP,~~ and the erosion control plan prior to the construction phase of the proposed Project would address the potential for construction of the Project to affect water quality. The proposed Project would comply with all applicable regional and local water quality standards and waste discharge requirements as stated above in the Regulatory Setting, including the MS4 permit and NPDES permit. As a result, with implementation of the regulatory requirements and standard conditions of the ~~PWQMP,~~ approval from SBCFCD, ~~SWPPP,~~ and the erosion control plan and compliance with applicable water quality standards and waste discharge requirements, water quality impacts associated with construction activities would be less than significant.

Page	Revision
5.9-34	The Final EIR will remove mention of the PWQMP since all stormwater from the Project site would be discharged to the drain to be installed as part of the East Avion Street Realignment project (Related Project F in the Draft EIR). As Avion Street is a private street, approval from San Bernardino County Flood Control District (SBCFCD) is needed, not a PWQMP.

Operational Impacts

Operation of the Project has the potential to introduce pollutants to the storm drain system from the proposed on-site uses. However, the proposed Project design includes measures to address any potential flood hazards. As specified in the San Bernardino County MS4 Permit, the Project includes ~~WQMP shall include~~ BMPs for source control, pollution prevention, site design, LID implementation, where feasible, and structural treatment control BMPs.[6] As shown in **Table 5.9-3**, ~~the PWQMP proposes~~ these BMPs would ~~to~~ comply with the MS4 permit.[7]

As discussed above, on-site stormwater detention facilities including 467,800 cubic feet of underground storage would be included in the Project to reduce the amount of additional runoff into existing drainage facilities.[8] The incorporation of the proposed operational BMPs ~~as stated in the PWQMP~~ would allow the Project to comply with San Bernardino County drainage requirements. Operational impacts related to creation or contribution of runoff water that would exceed the capacity of existing, or planned stormwater drainage systems or provide substantial additional sources of polluted runoff, would be less than significant.

Section 5.10 Noise

Page	Revision
5.10-46	The 12 additional unmitigated housing units and 43 additional persons within the CNEL 65-69 dBA contour is a typo and has been corrected to 15 additional housing units and 63 additional persons within the CNEL 65-69 dB(A) contour consistent with the Aircraft Noise Assessment.

6 State Water Resources Control Boards. *ORDER NO. R8-2010-0036. NPDES NO. CAS618036.*

7 City of Ontario. *Preliminary Water Quality Management Plan*. (See **Appendix 5.9-2.**)

8 CHA. *Preliminary Hydrology Study*. (See **Appendix 5.9-1.**)

Table 5.10-13: Housing Units and Population—Baseline Condition and Proposed Project provides the estimated number of unmitigated housing units and persons within the CNEL 65-69, 70-74, and 75+ dBA contours. As shown, in the year 2025 with the proposed Project it is estimated that there would be 4 additional unmitigated housing units and 18 persons within the CNEL 65-69 dBA contour and no housing units or persons within the CNEL 70+ dBA contour when compared to the baseline condition. By the year 2029, it is estimated that there would be ~~12~~ 15 additional unmitigated housing units and ~~43~~ 63 additional persons within the CNEL 65-69 dBA contour and no housing units or persons within the CNEL 70+ dBA contour. As noted under **Table 5.10-15**, some of the additional residences located within the Proposed Project 65-69 CNEL noise contour are subject to avigation easements allowing overflight by aircraft. When these avigation easements are considered, the number of additional housing units in 2025 is reduced to 3 units with the affected population reduced to 14 and in 2029 the number of housing units affected is reduced to ~~12~~ 15 units with the affected population reduced to 51.

Page Revision

5.10-52 The Draft EIR shows in the year 2025 with the proposed Project it is estimated that there would be four additional unmitigated housing units and 18 persons within the CNEL 65-69 dBA. This is a typo that has been corrected in the Final EIR to five (5) additional unmitigated housing units and 23 persons within the CNEL 65-69 dBA as stated in the Aircraft Noise Assessment.

TABLE 5.10-15
HOUSING UNITS AND POPULATION-PROPOSED PROJECT AND NO ACTION ALTERNATIVE

Year	Condition	Housing Units/ Population	65-69 CNEL	70-74 CNEL	75+ CNEL	Total
2025	No Project	Housing Units[a]	~~13~~12	0	0	~~13~~12
		Population[a]	~~59~~54	0	0	~~59~~54
	Proposed Project	Housing Units[b]	17	0	0	17
		Population[b]	77	0	0	77
	Increase with Proposed Project	Housing Units	~~+3~~+5	0	0	~~+3~~+5
		Population	~~+23~~+18	0	0	~~+23~~+18
2029	No Project	Housing Units[a]	13	0	0	13
		Population[a]	59	0	0	59
	Proposed Project	Housing Units[b]	28	0	0	28

TABLE 5.10-15 HOUSING UNITS AND POPULATION-PROPOSED PROJECT AND NO ACTION ALTERNATIVE						
Year	Condition	Housing Units/ Population	65-69 CNEL	70-74 CNEL	75+ CNEL	Total
		Population[b]	122	0	0	122
	Increase with Proposed Project	Housing Units	+15	0	0	+15
		Population	+63	0	0	+63

[a] *Source: Draft SEIR, Rehabilitation of Runway 8R-26L and Associated Airfield Improvements, HNTB, April 2022.*

[b] *Source: Crawford, Murphy & Tilly, Inc., October 2022.*

Section 5.12 Transportation

Page Revision

5.12-38 through 5.12-48 The analysis of the Opening Year (2025) Plus Phase 1 Project Conditions LOS analysis in Section 5.12 is updated to include correct Synchro analysis.

Opening Year (2025) Plus Phase 1 Project Conditions

Under the Opening Year (2025) Plus Phase 1 Project Conditions, the following intersections are projected to operate at LOS F under Opening Year (2025) Plus Phase 1 Project Conditions:

1. Euclid Avenue/SR-83 at Mission Boulevard

Although intersection 1 is operating below adopted LOS standards under Opening Year (2025) Plus Phase 1 Project Conditions, the Project is not forecast to degrade the intersection or add additional delay to this intersection.

4. Bon View Avenue at Mission Boulevard

Although intersection 4 is operating below adopted LOS standards under Opening Year (2025) Plus Phase 1 Project Conditions, the Project is not forecast to degrade the intersection or add additional delay to this intersection.

17. Archibald Avenue at Mission Boulevard

The Project is anticipated to add seven seconds of delay in the PM peak hour and degrade intersection operations at Intersection 17 to LOS F.

~~Although these intersections are operating below the desired LOS standard u~~Under Opening Year (2025) Plus Phase 1 Project Conditions, the Project will ~~not~~ degrade the intersection~~s or add additional delay to those intersections~~ operations at Intersection 17. ~~Generally, most intersections operate with similar delay relative to Opening Year (2025) No Project Conditions.~~

The Project is forecast to add trips to ~~these~~ intersections 1 and 2, which are projected to operate at LOS F, but the addition of this Project traffic decreases the estimate of average delay at ~~these intersections~~Intersection 4. This occurs because the average delay estimates in isolated intersection analysis are a weighted average of all movements. When trips are added to movements with excess green time that experience lower delay than the weighted average, such as the east/west through movements on Mission Boulevard, this results in the overall weighted average delay estimate being reduced. The intersection level of service for both Opening Year (2025) No Project and Plus Phase 1 Project Conditions is in **Table 5.12-9: Opening Year (2025) Intersection Level of Service**.

TABLE 5.12-9
OPENING YEAR (2025) INTERSECTION LEVEL OF SERVICE

	Intersection	Control	Peak Hour	Opening Year (2025) No Project LOS / Average Delay	Opening Year (2025) Plus Phase 1 Project LOS / Average Delay
1	Mission Blvd & Euclid Ave/SR-83[4]	Signalized	AM	E / 78	E / 79
			PM	**F / 88**	**F / ~~86~~88**
2	Mission Blvd & Sultana Ave	Signalized	AM	B / 15	B / 15
			PM	B / 16	B / 16
3	Mission Blvd & Campus Ave	Signalized	AM	C / 21	C / 21
			PM	C / 24	C / 24
4	Mission Blvd & Bon View Ave[5]	Signalized	AM	E / 72	E / 72
			PM	**F / 320**	**F / ~~318~~317**
5	Mission Blvd & Grove Ave	Signalized	AM	E / 68	E / 69
			PM	E / 69	E / 69

TABLE 5.12-9
OPENING YEAR (2025) INTERSECTION LEVEL OF SERVICE

	Intersection	Control	Peak Hour	Opening Year (2025) No Project	Opening Year (2025) Plus Phase 1 Project
				LOS / Average Delay	LOS / Average Delay
6	Baker Ave & Mission Blvd	Signalized	AM	A / 8	A / 8
			PM	A / 8	A / 8
7	Vineyard Ave & Avion St[4]	AWSC[1]	AM	A / 8	A / 8
			PM	A / 8	A / 9
8	Vineyard Ave & Avion Dr	TWSC[2]	AM	A / 0	A / 0
			PM	A / 0	A / 0
9	Vineyard Ave & Mission Blvd	Signalized	AM	B / 19	C / 22
			PM	C / 24	C / 24
10	Vineyard Ave & Francis St	Signalized	AM	B / 18	B / 18
			PM	C / 25	C / 24
11	Vineyard Ave & Philadelphia St	Signalized	AM	C / 22	C / 22
			PM	D / 36	~~C / 35~~D / 36
12	Vineyard Ave & Raymond Kay Way	Signalized	AM	C / 25	C / 25
			PM	B / 18	B / 18
13	Vineyard Ave & SR-60 WB Ramps	Signalized	AM	B / 17	B / 17
			PM	C / 26	C / 25
14	Vineyard Ave & SR-60 EB Ramps	Signalized	AM	C / 33	D / 40
			PM	C / 24	C / 24
15	Archibald Ave & Jurupa St	Signalized	AM	C / 16	C / 19
			PM	C / 17	C / ~~22~~23

TABLE 5.12-9
OPENING YEAR (2025) INTERSECTION LEVEL OF SERVICE

	Intersection	Control	Peak Hour	Opening Year (2025) No Project	Opening Year (2025) Plus Phase 1 Project
				LOS / Average Delay	LOS / Average Delay
16	Archibald Ave & Tracy Paseo	Signalized	AM	A / 9	A / 9
			PM	A / 10	A / 9
17	Archibald Ave & Mission Blvd[5]	Signalized	AM	E / 64	E / 68
			PM	E / 74	~~E / 80~~F / 81
18	Archibald Ave & Francis St	Signalized	AM	C / 23	C / 23
			PM	C / 28	C / 27
19	Archibald Ave & Cedar St	Signalized	AM	B / 16	B / 16
			PM	C / 20	C / 20
20	Archibald Ave & Philadelphia St	Signalized	AM	C / 32	C / ~~32~~33
			PM	C / 33	C / 33
21	Archibald Ave & SR-60 WB Ramps	Signalized	AM	B / 18	B / 19
			PM	C / 29	C / 29
22	Archibald Ave & SR-60 EB Ramps	Signalized	AM	C / 26	C / 27
			PM	C / 22	C / ~~22~~23
23	Haven Ave & I-10 WB Ramps	Signalized	AM	C / 29	C / 29
			PM	B / 17	B / 17
24	Haven Ave & I-10 EB Ramps	Signalized	AM	C / 34	C / 34
			PM	C / 27	C / 27
25	Haven Ave & Guasti Rd	Signalized	AM	C / 24	C / 24
			PM	C / 32	C / 32
26		Signalized	AM	D / 43	D / 43

TABLE 5.12-9
OPENING YEAR (2025) INTERSECTION LEVEL OF SERVICE

	Intersection	Control	Peak Hour	Opening Year (2025) No Project	Opening Year (2025) Plus Phase 1 Project
				LOS / Average Delay	LOS / Average Delay
	Haven Ave & Airport Dr		PM	D / 54	D / 54
27	Hofer Ranch Rd & Jurupa St	Signalized	AM	C / 21	C / 21
			PM	C / 21	C / 21
28	Jurupa St & Turner Ave	Signalized	AM	A / 9	A / 9
			PM	B / 11	B / 11
29	Jurupa St & Haven Ave	Signalized	AM	D / 41	D / 42
			PM	D / 48	D / ~~48~~49
30	Jurupa St & Carnegie Ave	Signalized	AM	A / 8	A / 8
			PM	A / 8	A / 8
31	Jurupa St & Commerce Pkwy	Signalized	AM	C / 26	C / 27
			PM	D / 45	D / 44
32	Jurupa St & Dupont Ave	Signalized	AM	B / 14	B / 14
			PM	A / 8	A / 8
33	Jurupa St & Milliken Ave	Signalized	AM	D / 38	D / 39
			PM	D / 42	D / ~~42~~43
34	Jurupa St & Rockefeller Ave	Signalized	AM	C / 22	C / 22
			PM	D / 41	D / ~~41~~42
35	Jurupa St & I-15 SB Ramps	Signalized	AM	C / 33	C / 34
			PM	C / 29	C / 29
36	Jurupa St & I-15 NB Ramps	Signalized	AM	C / 23	C / 24
			PM	B / 19	B / 19

TABLE 5.12-9
OPENING YEAR (2025) INTERSECTION LEVEL OF SERVICE

Intersection	Control	Peak Hour	Opening Year (2025) No Project	Opening Year (2025) Plus Phase 1 Project
			LOS / Average Delay	LOS / Average Delay

Notes:
1. *AWSC = All-Way Stop Controlled.*
2. *TWSC = Two-Way Stop Controlled.*
3. *Bolded results operate below adopted LOS standards.*
4. *Intersection delay decreases from Opening Year (2025) No Project with the addition of project traffic in one or both peak hours.*
5. *The LOS results at this intersection as reported by Synchro do not reflect the additional delays caused by trains. This intersection is expected to experience an additional average of seven minutes of delay per hour, which is not reflected in the LOS results.*

Source: Fehr & Peers. *Ontario International Airport South Airport Cargo Center Transportation Impact Study* (Traffic Study). March 2023 (see **Appendix 5.12-1**).

~~Since the Project is not forecast to worsen delay at any intersections that would be operating at LOS F under the~~ Additional delay is added to one intersection that is operating below adopted LOS standards under Opening Year (2025) ~~No~~ Plus Phase 1Project Conditions. ~~improvements are not needed at any study locations for Opening Year (2025) Plus Phase 1 Project conditions to maintain consistency with applicable performance standards.~~ Improvements are identified that will improve operating conditions at this intersection to better than pre-project conditions. With the following improvements, the intersection would operate at LOS E under Opening Year 2025 No Project and Plus Phase 1 Project Conditions:

- Add a dedicated left-turn pocket for the southbound approach with protected left-turn phasing for the northbound and southbound left-turn phases

With the identified improvement, intersection operations improve to better than pre-project conditions during both peak hours. Additionally, Archibald Avenue is programmed in the SCAG RTP to be widened to six lanes in each direction which is greater than the improvements identified as needed to improve this intersection to better than pre-project conditions. As such, the proposed Project would not conflict with any standard related to roadway facilities or services under Opening Year (2025) Conditions with the implementation of recommended roadway improvements.

Additional delay is added to one intersection that is currently operating below adopted LOS standards under the Opening Year (2029) Plus Phase 1 and Phase 2 Project Conditions.

Improvements are identified that would improve intersection operations to better than pre-project conditions to meet the applicable LOS standard.

1. Euclid Avenue/SR-83 at Mission Boulevard

The addition of Project traffic adds delay to the intersection, which is forecast to operate at LOS F in the AM and PM peak hours under Opening Year (2029) Conditions. Optimizing signal timing in the AM and PM peak hours would improve intersection operations to better than pre-project conditions.

This intersection is within both the City and Caltrans jurisdiction and the improvement will require cooperation with Caltrans, which is standard engineering practice with the City responsible to implement the improvement. With the identified improvement, intersection operations improve to better than pre-project conditions during both peak hours.

17. Archibald Avenue at Mission Boulevard

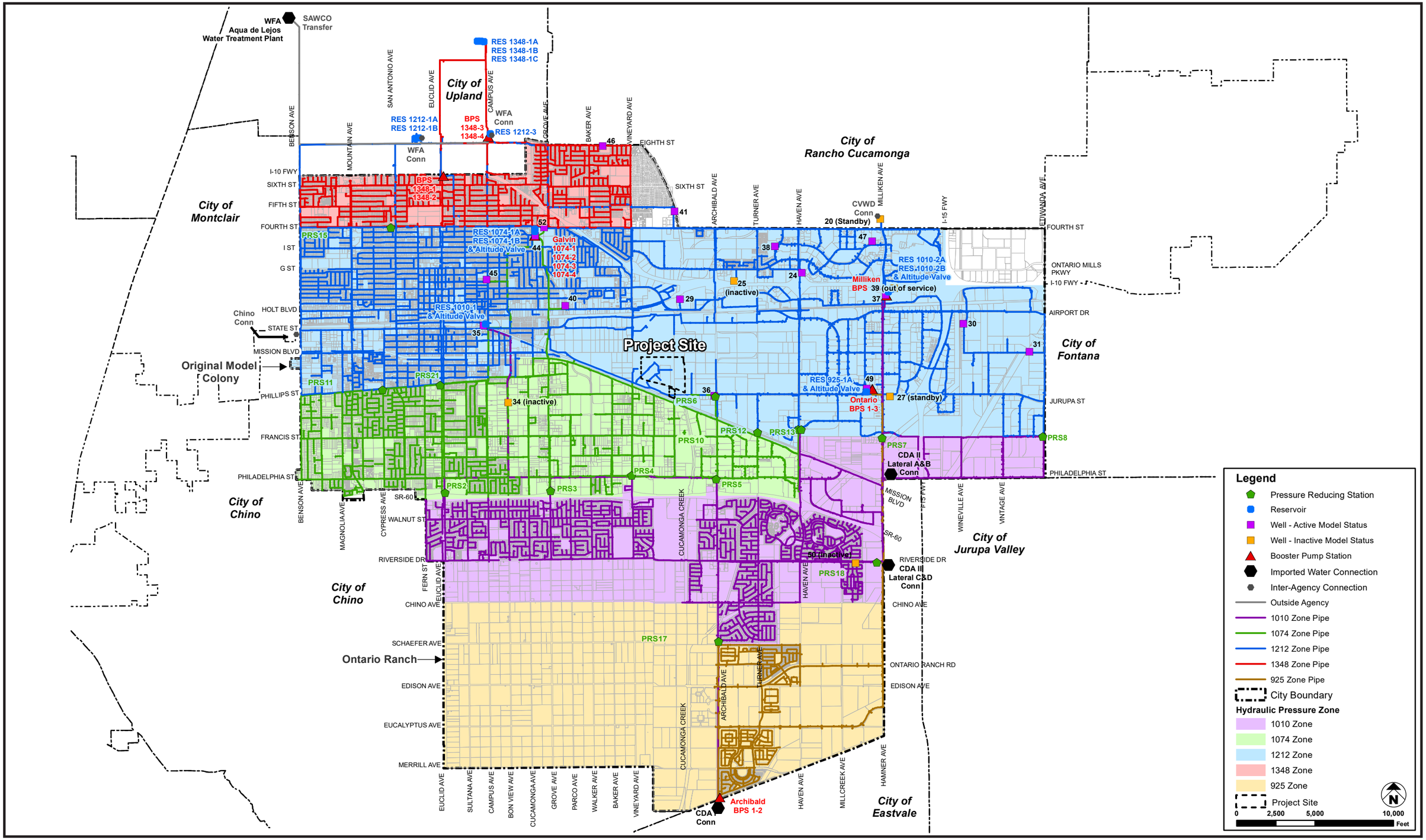
The addition of project traffic adds delay to the intersection, which is forecast to operate at LOS F in the PM peak hours under Opening Year (2029) Conditions. ~~With the following improvements, the intersection would operate at LOS E under Opening Year (2029) No Project and Plus Phase 1 and 2 Project Conditions:~~

- Add a dedicated left-turn pocket for the southbound approach with protected left-turn phasing for the northbound and southbound left-turn phases.

~~With the identified improvement, intersection operations improve to better than pre-project conditions during both peak hours. Please note that Archibald is programmed in the SCAG RTP to be widened to six lanes in each direction which is greater than the improvements identified as needed to improve this intersection to better than pre-project conditions.~~ The improvements recommended for Opening Year (2025) Plus Phase 1 Project Conditions would also improve Opening Year (2029) Plus Phase 1 and Phase 2 Project Conditions.

Section 5.14 Utility Service

Page	Revision
5.14-3	The source for **Figure 5.14-1: Existing Potable Water System for the City** has been updated to state "Draft OMUC 2020 Water Master Plan Update – 2020."



SOURCE: Draft OMUC 2020 Water Master Plan Update – 2020

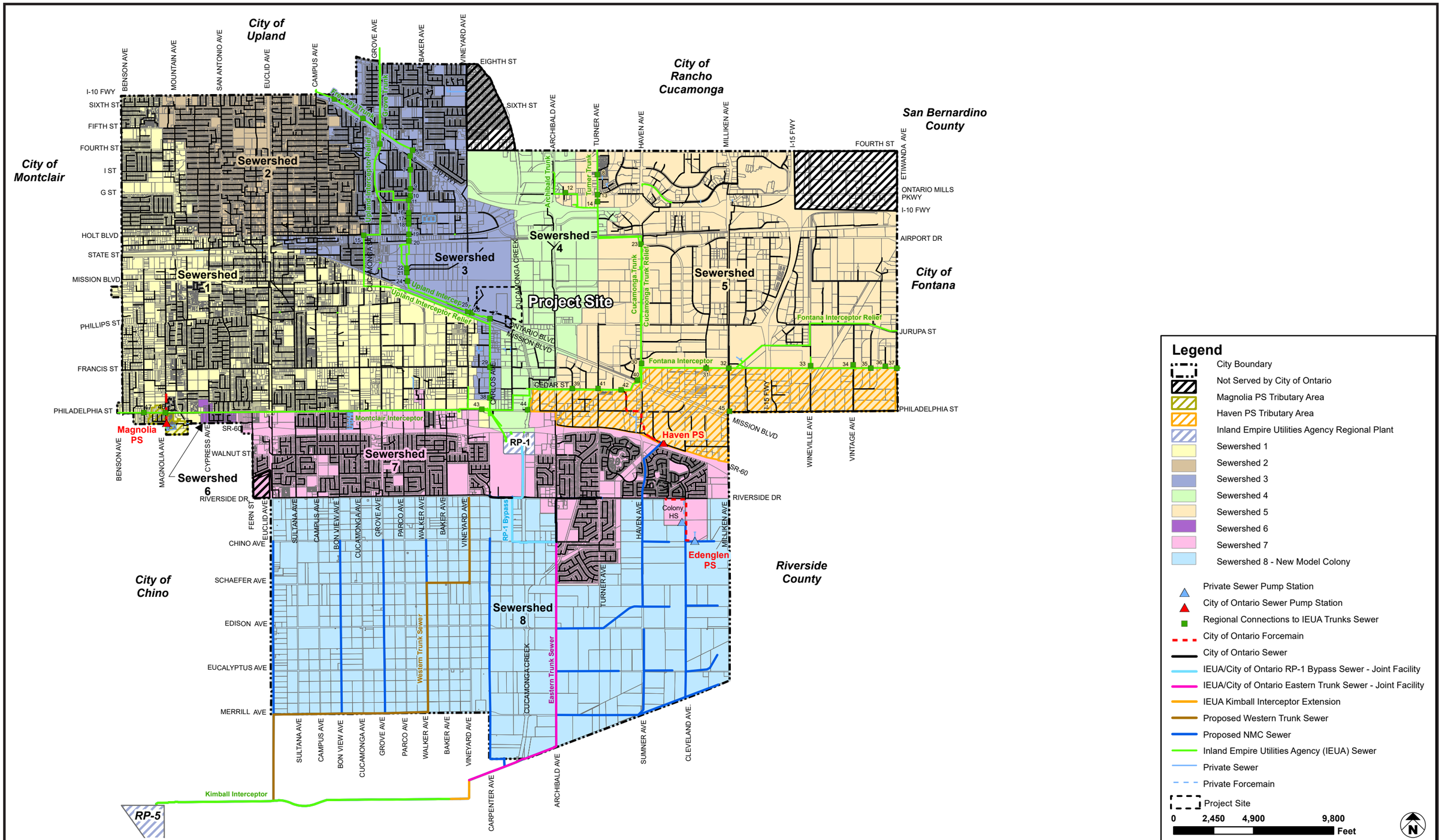
FIGURE **5.14-1**

Meridian Consultants

Existing Potable Water System for the City

332-001-21

Page	Revision
5.14-6	The source for **Figure 5.14-2: Ultimate Sewer System for the City** has been updated in the Final EIR to state "Draft OMUC 2020 Water Master Plan Update – 2020."
5.14-6	The title of **Figure 5.14-2** has been updated in the Final EIR to state "Ultimate Sewer System for the City."



SOURCE: Draft City of Ontario Sewer Master Plan – Feb 2018

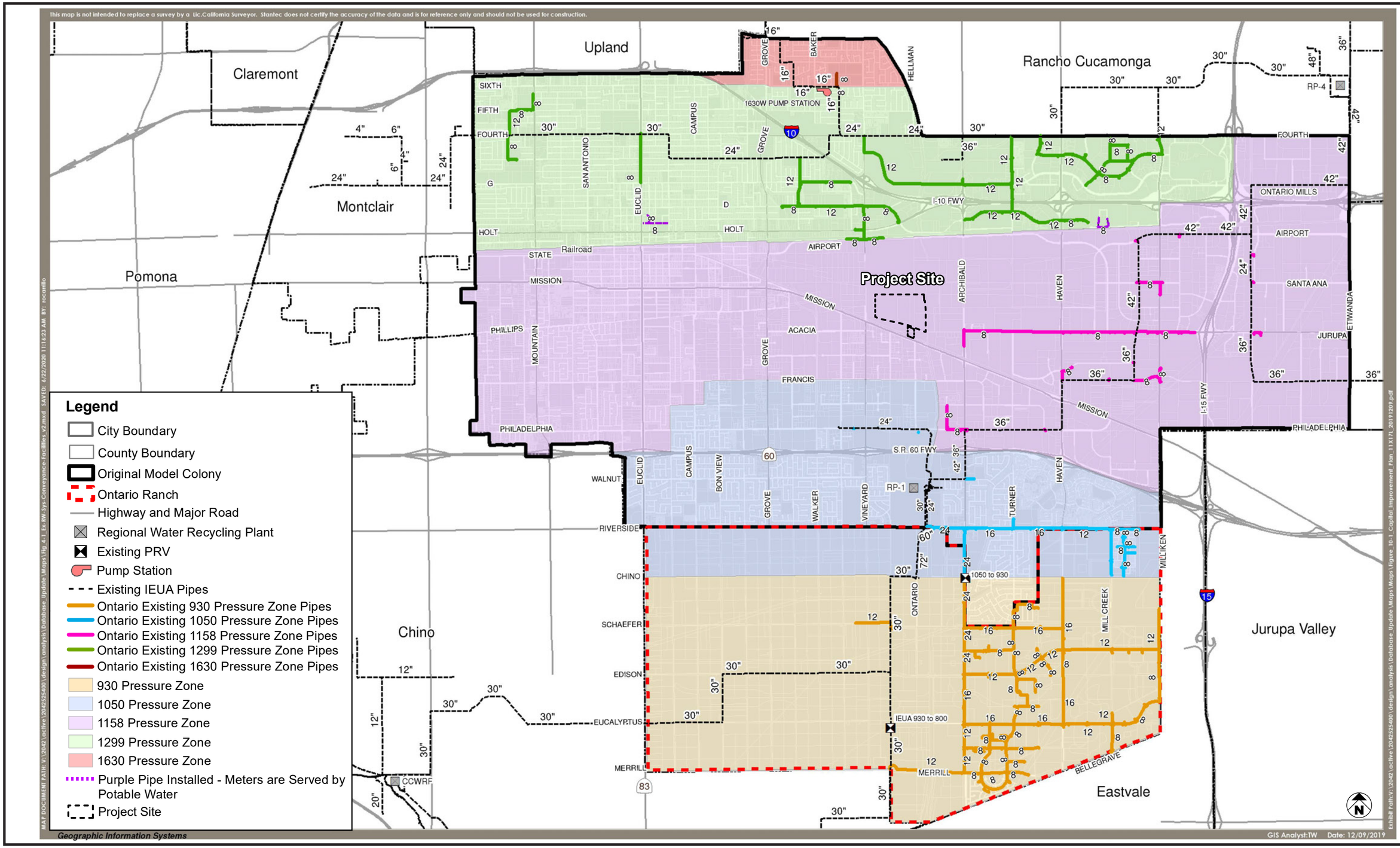
FIGURE **5.14-2**

Meridian Consultants

Ultimate Sewer System for the City

332-001-21

Page	Revision
5.14-9	The source for **Figure 5.14-3: Existing Recycled Water System for the City** has been updated in the Final EIR to state "Draft OMUC 2020 Recycled Water Master Plan – 2020."



SOURCE: Draft OMUC 2020 Recycled Water Master Plan – 2020

FIGURE **5.14-3**

Meridian Consultants

Existing Recycled Water System for the City

332-001-21

Page Revision

5.14-21 The Draft EIR has been revised to state there is no existing potable water main in Avion Street.

Operation

During operation, the Air Cargo Sort Building would be connected to ~~the existing 16-inch water main along East Avion Street~~ the new 18-inch water main on Avion Street that will be constructed between Vineyard Avenue and the point of connection east of the Cucamonga Channel as part of the East Avion Street Realignment project (Related Project F). Water would be supplied to the Air Cargo Sort Building, parking garage, and aircraft apron, for consumption as well as fire suppression.

Page Revision

5.14-23 The Draft EIR has been revised to state there is no existing sewer main in Avion Street.

Wastewater

Less Than Significant Impact.

Wastewater services would be provided by the IEUA.

There is no existing sewer main in Avion Street. The existing sewer main the Project will connect to is located south of Avion Street behind existing OIAA maintenance facilities. The sewer main would not be disturbed during construction of the proposed Project. Near the entry of the proposed truckyard, the sewer line would split into two separate service lines, one to the warehouse area of the cargo building and the other to the office wing. An oil-water separator would be installed in the truckyard, adjacent to the warehouse to separate oil and water mixtures into their separate components generated from the cargo building, as well as surface runoff in the truckyard and visitor parking lot, before entering the municipal sewer system. A sewer manhole would be installed at the fork of the two service lines for monitoring purposes.

Section 6.0: Alternatives

Page Revision

6.0-4 The Draft EIR has been revised to update the air quality and GHG PDFs and mitigation measures in Section 6.0: Alternatives in response to the SCAQMD comment letter dated April 25, 2023.

As discussed in **Section 5.2: Air Quality**, the proposed Project's operational emissions during Phase 1 and Phase 2 would exceed SCAQMD significance thresholds for CO, VOC, NOx (Phases 1 and 2), and SO_2 (Phase 2 only), primarily due to aircraft, followed by employee vehicles, delivery trucks, and emergency generators. The proposed Project would incorporate Project Design Features **PDF AQ-13** through **PDF AQ-811**, Mitigation Measures **MM AQ-1** through **MM AQ-716,** and mitigation measures **TRANS-1** through **TRANS-5** in **Section 5.12: Transportation,** of this Draft EIR to reduce operational air quality emissions to the greatest extent feasible. Nevertheless, reducing operational emissions from aviation operations to a less than significant level would not be feasible as the proposed Project is an air cargo facility serving a large region, and the operational and economic viability of the proposed Project relies on these aviation operations. Mitigation to further reduce the proposed Project's impact is not feasible because neither SCAQMD nor OIAA have the authority to regulate aircraft operations and aircraft engines; such regulatory authority is vested under the federal Clean Air Act with the United States Environmental Protection Agency (USEPA) (in consultation with the FAA). As such, operational air quality emissions would be significant and unavoidable.

As discussed in **Section 5.7: Greenhouse Gas Emissions**, the proposed Project would generate approximately 128,000 $MTCO_2e$ of GHG emissions per year at full build-out. The majority (i.e., over 75 percent) of the GHG emissions associated with future operation of the proposed Project are related to aircraft sources (i.e., aircraft, APU, and ground service equipment [GSE]). As discussed above, the Airport does not have authority to regulate aircraft operations or emissions from aircraft engines as aircraft are a federal source regulated by the USEPA. Project Design Features **PDF AQ-13 through PDF AQ-5, PDF AQ-7, through PDF AQ-811,** Mitigation Measures **MM AQ-1** through **MM AQ-716,** and Mitigation Measures **TRANS-1** through **TRANS-5** in **Section 5.12, Transportation,** of this Draft EIR would serve to reduce GHG emissions. Additionally, the proposed Project includes Project Design Features **PDF GHG-1** and **PDF GHG-2** to reduce GHG emissions to the greatest extent feasible. Nevertheless, there are no feasible mitigation measures that would reduce the proposed Project's GHG emissions to a level below significance. As such, the proposed Project's GHG emissions would be significant and unavoidable.

Section 8.0: Alternatives

Page	Revision
8.0-1	The Draft EIR has been revised to update the air quality and GHG PDFs and mitigation measures in Section 8.0: Other CEQA Considerations in response to the SCAQMD comment letter dated April 25, 2023.

Air Quality

As discussed in **Section 5.2: Air Quality**, estimated emissions from operation of Phase 1 and Phase 2 of the proposed Project would exceed SCAQMD significance thresholds for CO, VOC, NOx (Phases 1 and 2), and SO_2 (Phase 2 only), primarily due to aircraft emissions, followed by employee vehicles, delivery trucks, and emergency generators. The proposed Project would incorporate Project Design Features **PDF AQ-13** ~~3~~ through **PDF AQ-8**~~8~~11 and Mitigation Measures **MM AQ-14** ~~4~~ through **MM AQ-7**~~7~~16**,** as well as mitigation measures **TRANS-1** through **TRANS-5** in **Section 5.12, Transportation,** of this Draft EIR to reduce operational air quality emissions to the greatest extent feasible. Neither the SCAQMD nor OIAA have the authority to regulate aircraft operations or emissions from aircraft engines and the majority of the emissions estimated for operation of the proposed Project are from aircraft operations. The 2022 AQMP identifies actions that can be taken by other agencies with regulatory jurisdiction to address these sources of emissions, including the adoption of more stringent criteria pollutant standards for aircraft engines and use of cleaner aviation fuels. It is anticipated that these types of future technology improvements will reduce the aviation emissions associated with the proposed Project over time. As the proposed Project is an air cargo facility serving the region, the operational and economic viability of the proposed Project relies on these aviation operations. For these reasons, there are no additional feasible mitigation measures that would reduce operational emissions to below significance thresholds and operational air quality emissions would remain significant after implementation of all feasible mitigation.

Greenhouse Gas Emissions

As discussed in **Section 5.7: Greenhouse Gas Emissions**, the proposed Project would generate approximately 128,057 $MTCO_2e$ of GHG emissions per year at full build-out. The majority (i.e., over 75 percent) of the GHG emissions associated with future operation of the proposed Project are related to aircraft sources (i.e., aircraft, auxiliary power unit [APU], and ground service equipment [GSE]). Project Design Features **PDF AQ-13** ~~3~~ through ~~**PDF AQ-5, PDF AQ-7,**~~**PDF AQ-8**~~8~~11, Mitigation Measures **MM AQ-14** through **MM AQ-7**~~7~~16**,** and mitigation measures **TRANS-1** through **TRANS-5** in **Section 5.12: Transportation,** would serve to reduce GHG emissions.

Additionally, the proposed Project includes Project Design Features PDF GHG-1 and PDF GHG-2 to reduce GHG emissions to the greatest extent feasible. As discussed above, neither the SCAQMD nor OIAA have the authority to regulate aircraft operations or emissions from aircraft engines and the majority of the emissions estimated for operation of the proposed Project are from aircraft operations. As with the operational air quality emissions associated with the proposed Project, while it is anticipated future technology improvements are anticipated to reduce Project GHG emissions over time, there are no additional feasible mitigation measures available at this time that would reduce GHG emissions to below significance thresholds. For this reason, the proposed Project's GHG emissions would remain significant after implementation of all feasible mitigation.

Appendix 5.2-1

The PDFs and mitigation measures revised and added in this Final EIR supersede the PDFs and mitigation measures listed in Appendix 5.2-1.

Page	Revision
19-20	The 2021 Baseline Condition referred to in Appendix 5.2-1 is the same as the Baseline Condition in the analysis in Section 5.2 and throughout the Draft EIR. The "(2021)" parenthetical has been removed.

Analysis Scenarios

For the emissions inventory, in order to determine the proposed project-related operational impacts associated with air pollutant emissions, the total emissions associated with the proposed project that will occur in Phase 1 and Phase 2 including other aircraft operations not associated with the project will be compared to the ~~2021~~ baseline emissions. The difference between these two conditions will be used to determine the significance of the proposed project when compared to the SCAQMD thresholds.

- Year 2025 with project operations compared to the ~~2021~~ Baseline Condition
- Year 2029 with project operations compared to the ~~2021~~ Baseline Condition

However, this comparison will be influenced by factors that are not attributable to the project itself. Specifically, the comparison will contain future aircraft operations from background growth that are projected to occur with or without the proposed project. In order to remove the contribution of background growth, for CEQA purposes, a second comparison will be provided for the proposed future project and the proposed future without project. This comparison will

be made for informational purposes only and in which the significance of the project impacts will not be based.

- Year 2025 with project operations compared to the Year 2025 without project operations
- Year 2029 with project operations compared to the Year 2029 without project operations

For the air dispersion modeling, in order to evaluate impacts associated with the proposed project in isolation (i.e., without including impacts associated with existing airport operations), concentrations associated with the ~~2021~~ Baseline Condition will be subtracted from future year with project concentrations (i.e., project-related concentrations). Then, in order to determine the total concentrations for CO, SO2, and NO2, these project-related concentrations will be added to a background concentration (i.e., representing other nearby emission sources not associated with the airport or the project) based on nearby existing ambient monitoring station(s). For CO, SO2, and NO2, these total concentrations will be compared to the California and National AAQS. Per SCAQMD guidance, the project-related concentrations of PM10 and PM2.5 will be compared to the SCAQMD significance thresholds for PM10 and PM2.5 (without adding background concentrations).

- Year 2025 with project operations compared to the ~~2021~~ Baseline Condition
- Year 2029 with project operations compared to the ~~2021~~ Baseline Condition

Page	Revision
37	~~Notably, t~~The proposed Project would cause a minor increase in aircraft the taxi-in times and taxi-out times associated with non-project aircraft operations. ~~This is a result of the greater number of aircraft operations which decreases airfield taxi efficiency.~~ Therefore, the air quality analysis includes the impacts due to project-related and non-project related aircraft operations.

Page	Revision
A-8	Table A-4 provides the taxi-in/taxi-out time inputs to AEDT by year and alternative. As shown, the Proposed Project would increase the taxi-in times and taxi-out times. ~~This is a result of the greater number of aircraft operations which decreases airfield taxi efficiency.~~

Appendix 5.12-1: Traffic Study

The analysis of the Opening Year (2025) Plus Phase 1 Project Conditions LOS analysis in Section 5.12 is updated to include correct Synchro analysis. See **Appendix 1.0** to this Final EIR.

3.0 RESPONSES TO COMMENTS ON THE DRAFT EIR

3.1 INTRODUCTION

In accordance with CEQA Guidelines Section 15088, this document includes written responses to comments received by Ontario International Airport Authority (OIAA) on the Draft EIR.

Comments are organized with the following information in order of public agencies (state, regional, local), organizations, and individuals:

- Name of the Commentor/Agency
- Date the Comment was Received
- Comment Number (broken into multiple comments per letter)
- Comment Text
- OIAA Response

3.2 COMMENT LETTERS RECEIVED

Nine (9) comment letters were received during the Draft EIR comment period. Five (5) agencies commented on the Draft EIR (two comment letters were received from South Coast Air Quality Management District [SCAQMD], one of which was a request for additional information), two (2) organizations, and one (1) member of the public commented on the Draft EIR (requesting clarification on the website for the Draft EIR). Comment letters are provided in **Appendix 1.0**.

Comments were received on the Draft EIR from the following public agencies, organizations, and individuals:

A. State Clearinghouse (SCH)
B. SCAQMD, Danica Nguyen, Air Quality Specialist
C. SCAQMD, Sam Wang, Program Supervisor
D. San Bernardino County, Department of Public Works, Nancy Sansonetti, AICP, Supervising Planner, Environmental Management
E. City of Ontario, Rudy Zeledon, Community Development Assistant Director
F. City of Chino, Jackie Melendez, Assistant City Manager
G. Inland Valley Advocates for the Environment, Natasha Walton, Board Member
H. Advocates for the Environment, Dean Wallraff, Executive Director
I. Debbie Duncan

Please note footnotes from the replicated comments have been omitted. The footnotes in the comment letters can be viewed in the bracketed versions of the comments, which are located in the pages preceding the responses.

TOPICAL RESPONSE 1: SUSTAINABLE PROJECT DESIGN FEATURES AND MITIGATION MEASURES

Several comments in **Comment Letter C** from the South Coast Air Quality Management District (SCAQMD) and **Comment Letter H** from Advocates for the Environment suggest additional mitigation measures in response to the Draft EIR's conclusion that the proposed Project's regional, operational air quality emissions and greenhouse gas (GHG) emissions would be significant. Responses to some of the additional mitigation measures suggested in those comments are set forth in subsequent, individual responses to comments in this Final EIR. This Topical Response, however, has been prepared to comprehensively address the suggested mitigation measures relating to building design and use of zero-emission or near-zero emission on-road trucks and on-site vehicles and equipment.

The proposed Project applicant (Applicant) is a global company that engages in domestic and international movement of parcels and freight. Over the past few years, the Applicant has developed, and continues to improve and refine, a global sustainability program with a variety of measures to eventually achieve climate-neutral logistics. The discussion below focuses on elements of that sustainability program in responding to certain comments in Comment Letters C and H.

Relevant Project Design Features and Mitigation Measures

By way of introduction, the Draft EIR includes numerous project design features (PDFs) and mitigation measures (MMs) that are recommended to reduce or mitigate the Project's operational air quality and GHG impacts. These PDFs and MMs are tailored to the various emissions-generating components of the proposed Project and reflect an effort to comprehensively reduce emissions where practicable and feasible, given the operating attributes of the Project. Some of the emission reductions attributable to the PDFs and MMs are quantified in the Draft EIR and the Responses to Comments, while others are presently qualitative in nature.

As discussed in this Topical Response and other responses to comments in this Final EIR, some of those PDFs and MMs have been modified in response to comments on the Draft EIR and/or for clarity. In addition, the Final EIR includes new PDFs and MMs in response to comments on the Draft EIR. The final PDFs and MMs that pertain to the Project's operational air quality and

GHG emissions are set forth in **Section 2.0: Additions and Corrections** and **Section 4.0: Mitigation Monitoring and Reporting Program** in this Final EIR. For ease of reference, they also are presented in **Table TR-1: Air Quality and Greenhouse Gas Project Design Features (PDFs) and Mitigation Measures**, below.[1]

TABLE TR-1
AIR QUALITY AND GREENHOUSE GAS PROJECT DESIGN FEATURES (PDFS) AND MITIGATION MEASURES

Project Design Features (PDFs)	
PDFs in Draft EIR	
Original PDF	Revised PDF
PDF AQ-1: The Applicant shall use equipment that meets the USEPA's Tier 4 emissions standards for offroad diesel-powered construction equipment with 50 horsepower (hp) or greater, for all phases of construction activity. To ensure that Tier 4 or the cleanest construction equipment available would be used during the Project's construction, the OIAA shall confirm that the Applicant includes this requirement in applicable bid documents, purchase orders, and contracts. Additionally, the OIAA shall confirm that the Applicant also requires periodic reporting and provision of written construction documents by construction contractor(s) and conducts regular inspections to the maximum extent feasible to ensure and enforce compliance.	**PDF AQ-1**: For all phases of construction activity, ~~T~~the Applicant shall require use of off-road construction equipment that is zero emission, if and to the extent available, or diesel-fueled off-road construction equipment that meets the USEPA's Tier 4 emissions standards for off-road diesel-powered construction equipment with 50 horsepower (hp) or greater~~, for all phases of construction activity~~. To ensure that Tier 4 or the cleanest construction equipment available would be used during the Project's construction, the OIAA shall confirm that the Applicant includes this requirement in applicable bid documents, purchase orders, and contracts. Additionally, the OIAA shall confirm that the Applicant also requires periodic reporting and provision of written construction documents by construction contractor(s) and conducts regular inspections to the maximum extent feasible to ensure and enforce compliance.
PDF AQ-2: The Applicant shall conduct concrete/asphalt demolition on-site to reuse	No revision.

[1] While this Topical Response 1 is limited to operational air quality and GHG emission issues, **Table TR-1** includes both construction and operational PDFs and mitigation measures to provide a comprehensive list of all of the recommended air quality and GHG PDFs and MMs.

TABLE TR-1
AIR QUALITY AND GREENHOUSE GAS PROJECT DESIGN FEATURES (PDFS) AND MITIGATION MEASURES

concrete/asphalt generated during construction. During Phase 1, demolition would involve removal of approximately 2,047,320 square feet of asphalt/concrete, which would be recycled within the project site and not require off-site haul truck trips (i.e., avoiding 2,616 haul truck trips). During Phase 2, demolition would involve removal of approximately 1,045,440 square feet of asphalt/concrete, which would be recycled within the project site and not require off-site haul truck trips (i.e., avoiding 910 haul truck trips).	
PDF AQ-3: The Ground Support Equipment (GSE), including (but not limited to) aircraft tugs, baggage tugs, belt loaders, cargo loaders, forklifts, and ground power units, ramp support carts/vans, servicing aircrafts shall be electric by Phase 2.	No revision.
PDF AQ-4: A portion of the proposed Project's aircraft fleet shall include electric cargo aircraft. (See Table 3.4 in Section 3.0: Project Description).	No revision.
PDF AQ-5: All new aircraft parking positions shall be equipped with ground power and pre-conditioned air, therefore reducing the need to operate auxiliary power units.	No revision.
PDF AQ-6: The Applicant shall conduct maintenance and/or testing on each of the seven standby generators on separate days to limit daily emissions from maintenance/testing activities.	No revision.
PDF AQ-7: The Air Cargo Sort Building shall meet Leadership in Energy and Environmental Design (LEED) certification standards, shall include enhanced building automation systems, and shall utilize advanced low energy HVAC systems.	No revision.
PDF AQ-8: The visitor parking lot shall include 29 parking stalls, 6 of which shall have access to electric charging points. The employee parking	No revision.

TABLE TR-1 AIR QUALITY AND GREENHOUSE GAS PROJECT DESIGN FEATURES (PDFS) AND MITIGATION MEASURES	
structure shall include 932 parking stalls, 300 of which shall have access to electric charging points.	
PDF GHG-1: The Air Cargo Sort Building shall be all-electric (no natural gas usage).	No revision.
PDF GHG-2: The proposed Project shall include a 1.5-Megawatt Solar PV Panel System on the rooftop of the Air Cargo Sort Building and Parking Structure.	**PDF GHG-2**: The proposed Project shall include a ~~1.5~~3.8-Megawatt Solar PV Panel System on the rooftop of the Air Cargo Sort Building and Parking Structure.
Project Design Features (PDFs) Added in the Final EIR	
PDF AQ-9: The Air Cargo Sort Building shall incorporate all of the following design specifications and technologies: • Building automation • Efficient, heat pump HVAC • Natural ventilation • Purchase of electricity from the SCE 100% Clean Rate Program, if and to the extent feasible • Efficient dock seals • Rapid rise doors • Solar shades • Low use water appliances • Sustainable, drought-tolerant landscaping featuring a native, non-invasive vegetation palette • Submeters with advanced energy monitoring • Main meter energy monitoring • Efficient transformers • Battery storage-ready infrastructure • Building automation by an enhanced building management system • Enhanced glazing	

TABLE TR-1 AIR QUALITY AND GREENHOUSE GAS PROJECT DESIGN FEATURES (PDFS) AND MITIGATION MEASURES	
PDF AQ-10: The Project shall include electric charging infrastructure in the truckyard that, at a minimum, accords with all applicable requirements of California's Building Energy Efficiency Standards, as set forth within Title 24, Part 6, of the California Code of Regulations.	
PDF AQ-11: The storage and maintenance of Project-related delivery trucks shall occur only on site. In the event that overnight parking of delivery trucks is necessary, such trucks shall be parked within the Project site.	
Mitigation Measures (MMs)	
Mitigation Measures in Draft EIR	
Original Mitigation Measure	**Revised Mitigation Measure**
MM AQ-1: The Applicant shall require that construction vendors, contractors, and/or haul truck operators commit to using 2010 model year trucks (e.g., material delivery trucks and soil import/export with a gross vehicle weight rating of at least 14,001 pounds), that meet CARB's 2010 engine emissions standards or newer, cleaner trucks. The OIAA shall confirm that the Applicant includes this requirement in applicable bid documents, purchase orders, and contracts. Operators shall maintain records of all trucks associated with Project construction to document that each truck used meets these emission standards and make the records available for inspection.	No revision.
MM AQ-2: The Applicant shall require that construction equipment such as concrete/industrial saws, pumps, aerial lifts, light stands, air compressors, and forklifts be electric or alternative-fueled (i.e., non-diesel), where feasible. Pole power shall be utilized at the earliest feasible point in time	No revision.

TABLE TR-1
AIR QUALITY AND GREENHOUSE GAS PROJECT DESIGN FEATURES (PDFS) AND MITIGATION MEASURES

and shall be used to the maximum extent feasible in lieu of generators.	
MM AQ-3: The Applicant shall support and encourage ridesharing and transit incentives for the construction crew by providing crews with the resources needed to organize rideshares, such as bulletin boards or email announcements. The Applicant shall also partially subsidize transit fares or passes for the construction crew members who can feasibly use transit. The Applicant shall set a goal to achieve ten percent total construction worker participation in ridesharing programs and transit use.	No revision.
MM AQ-4: The Applicant shall require, in addition to the GSE noted within PDF AQ-3, all other on-site cargo-handling equipment, such as yard trucks, holsters, yard goats, pallet jacks, and similar equipment, to be electric, with the necessary electrical charging stations provided.	No revision.
MM AQ-5: The Applicant shall require, where feasible, the use of zero-emission Project-related delivery trucks as part of business operations beginning in 2025 (within at least 25 percent of the Project fleet). The Applicant also shall require, where feasible, the use of zero-emission Project-related delivery trucks as part of the business operations beginning in 2029 (within at least 50 percent of the Project fleet).	**MM AQ-5:** The Applicant shall require, ~~where~~ if and to the extent feasible, the use of zero-emission or near zero-emission on-road heavy duty~~Project-related delivery~~ trucks as part of business operations beginning in 2025 (within at least 25 percent of the Project fleet). The Applicant also shall require, ~~where~~ if and to the extent feasible, the use of zero-emission or near zero emission on-road heavy duty~~Project-related delivery~~ trucks as part of the business operations beginning in 2029 (within at least 50 percent of the Project fleet).
MM AQ-6: The Applicant shall include in the design requirements for the Project that a cool roof be installed at the parking structure to reduce energy use and urban heat island effects. This	**MM AQ-6:** The Applicant shall include, in the design requirements for the Project, ~~that a~~ cool roof ~~be installed~~ installation to the extent roof space is not occupied by solar panels, in order ~~at~~

TABLE TR-1 AIR QUALITY AND GREENHOUSE GAS PROJECT DESIGN FEATURES (PDFS) AND MITIGATION MEASURES	
requirement shall not apply if solar panels are installed on the parking structure.	~~the parking structure~~ to reduce energy use and urban heat island effects. ~~This requirement shall not apply if solar panels are installed on the parking structure.~~
MM AQ-7: The Applicant shall encourage the use of single engine taxi operations for Project aircraft.	No revision.
Mitigation Measures Added in the Final EIR	
MM AQ-8: The Applicant shall utilize Energy Star heating, cooling, and lighting devices, and appliances (e.g., Heating, Ventilation, and Air Conditioning (HVAC) units in the form of energy efficient commercial heat pumps) within the interior of the Air Cargo Sort Building.	
MM AQ-9: In order to reduce trips to and from the Project site during construction, the Applicant shall provide on-site food trucks during meal times.	
MM AQ-10: Interior- and exterior-facing signs, including signs directed toward all dock and delivery areas, shall be posted by the Applicant to identify contact information to report idling violations to CARB, SCAQMD, and the building manager. These signs also shall inform truck drivers to shut off their engines when not in use.	
MM AQ-11: Electric plugs for electric transport refrigeration units shall be provided at dock doors located at the Air Cargo Sort Building.	
MM AQ-12: The Applicant shall train operational managers and employees on efficient scheduling and load management to eliminate unnecessary queuing of trucks.	
MM AQ-13: Signs shall be posted by the Applicant at every truck exit driveway providing directional information to use truck routes as designated by the City of Ontario.	

TABLE TR-1 AIR QUALITY AND GREENHOUSE GAS PROJECT DESIGN FEATURES (PDFS) AND MITIGATION MEASURES	
MM AQ-14: The Applicant shall require its facility operator(s) to train the staff in charge of keeping vehicle records on diesel technologies and compliance with CARB regulations by attending CARB-approved courses. Also, the Applicant shall require its facility operator(s) to maintain records on-site demonstrating regulatory compliance and make records available for inspection by OIAA, SCAQMD, and State of California upon request.	
MM AQ-15: The Applicant shall include a provision in all operational freight hauling contracts requiring the use of 2010 model year trucks that meet CARB's 2010 engine emission standards, or newer and cleaner trucks, if and to the extent feasible.	
MM AQ-16: During construction, the Applicant shall post interior- and exterior-facing signs to inform construction contractors to shut off truck and equipment engines when not in use.	

Carbon Neutral Building Design

The SCAQMD comment letter (see **Comment C-5**) suggests as a mitigation measure the use of light-colored paving and roofing materials, as well as other design-related mitigation measures, to reduce the proposed Project's operational air quality impact.

The Applicant's approach to building design employs a broad range of green building technologies to achieve carbon neutral design for all of its new buildings (*i.e.*, zero emission buildings) by incorporating a variety of technologies into the building design to reduce energy use, track energy consumption to support identification of further improvements, generate renewable energy on site (as discussed in **Response to Comment H-11**), and utilize clean energy sources. To help achieve this goal, the primary Project building, the Air Cargo Sort Building incorporates all of the following technologies:

- Solar ready roof
- Solar panels (PV)

- Building automation
- Efficient, heat pump HVAC
- Natural ventilation
- Purchase of electricity from the SCE 100% Clean Rate Program, if and to the extent feasible
- Efficient dock seals
- Rapid rise doors
- Solar shades
- Low use water appliances
- Sustainable landscaping
- Submeters with advanced energy monitoring
- Main meter energy monitoring
- Efficient transformers
- Electric vehicle charging infrastructure
- Battery storage-ready infrastructure
- Building automation by an enhanced building management system
- Enhanced glazing.

The combined reduction in operational air quality and GHG emissions associated with the inclusion of these technologies in the Air Cargo Sort Building have not been quantified pending the completion of the building design. However, each of these technologies would effectively contribute to achievement of a carbon neutral building design/zero emission building. In addition, with the incorporation of these technologies and the other operational air quality and GHG PDFs, the Project would meet or exceed CalGreen Tier 2 green building standards.

The text in Section 3.0: Project Description of the Draft EIR has been revised to identify these characteristics of the proposed Project design. In addition, as reflected in **Table TR-1**, above, a new operational project design feature—PDF AQ-9—has been added in Section 5.2: Air Quality and Section 5.7: Greenhouse Gas Emissions in the Draft EIR to identify the foregoing elements of the building design that are not already captured by preexisting PDFs and MMs (*e.g.*, PDF AQ-8 and MM AQ-6). Please see **Section 2.0: Additions and Corrections** in this Final EIR for all changes made to clarify, correct, and supplement the information in the Draft EIR.

Of additional relevance to this discussion, PDF GHG-1 (see Draft EIR, page 5.7-34) is consistent with the Applicant's commitment to carbon neutral design, stating that "[t]he Air Cargo Sort Building shall be all-electric (no natural gas usage)." In furtherance of this carbon neutral building

design commitment, PDF AQ-7 (see Draft EIR, page 5.2-65) also requires that "[t]he Air Cargo Sort Building shall meet Leadership in Energy and Environmental Design (LEED) certification standards, shall include enhanced building automation systems, and shall utilize advanced low energy HVAC systems."

The Applicant estimates that the collective cost of the sustainable building enhancements incorporated into the building design would be approximately $13 million.

Zero-Emission or Near-Zero-Emission Trucks

The SCAQMD and Advocates for the Environment comment letters suggest mitigation measures that would require the use of electric delivery trucks and on-site electric vehicles and equipment if and to the extent feasible. First, the SCAQMD comment letter (see **Comment C-4**) suggests the following mitigation measure with respect to the proposed Project's operational air quality impact from mobile sources:

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

MM AQ-15, which is set forth in **Table TR-1** above, and in **Section 2.0: Additions and Corrections** and **Section 4.0: Mitigation Monitoring and Reporting Program** in this Final EIR, has been added to meet CARB's 2010 engine emissions standards to further reduce operational mobile emissions:

MM AQ-15: The Applicant shall include a provision in all operational freight hauling contracts requiring the use of 2010 model year trucks that meet CARB's 2010 engine emission standards, or newer and cleaner trucks, if and to the extent feasible.

In addition, MM AQ-5, which is set forth in **Table TR-1** above, and in **Section 2.0: Additions and Corrections** and **Section 4.0: Mitigation Monitoring and Reporting Program** in this Final EIR, does require the use of zero emission or near zero emission trucks:

MM AQ-5: The Applicant shall require, if and to the extent feasible, the use of zero-emission or near zero emission on-road heavy duty trucks as part of business operations beginning in 2025 (within at least 25% of the Project fleet).

The Applicant also shall require, if and to the extent feasible, the use of zero-emission or near zero emission on-road heavy duty trucks as part of business operations beginning in 2029 (within at least 50% of the Project fleet).

MM AQ-5 is consistent with the SCAQMD's comment, in that both recognize that the electrification of the proposed Project's delivery trucks may not be entirely feasible within a defined time frame due to current technological and supply constraints. One component of the Applicant's sustainability program is to expand its green fleet of vehicles in the United States with electric tractor-trailer trucks that employ safe battery technology and are capable of running all day on a single charge. It launched this effort at the end of 2020 with an ongoing pilot program in the Los Angeles area to determine the performance characteristics of these trucks, such as range and time to charge, and their suitability to meet the Applicant's needs.

The concept of feasibility is particularly relevant here because the electrification of the Applicant's on-road delivery trucks is challenging in several respects, including the following:

- Upfront Cost: Electric trucks typically have a higher upfront cost compared to their diesel counterparts. This cost differential includes the price of the vehicle itself as well as the investment in charging infrastructure and related equipment. The significant initial investment is a barrier for fleet operators.
- Range and Charging Time: Electric trucks have a limited driving range compared to diesel trucks. Charging electric truck batteries takes significantly longer than refueling with diesel. Fleet operators must account for the time required for charging, which can affect the efficiency of operations and productivity.
- Vehicle Availability: The availability of electric truck models suitable for various fleet operations is limited. Fleet operators need a diverse range of truck types, sizes, and configurations to meet their specific needs. The limited availability of electric trucks pose challenges for fleet operators in adopting electric vehicles across their entire fleet.
- Maintenance and Service: Electric trucks have different maintenance requirements as compared to diesel trucks. Fleet operators need access to specialized technicians, training and service infrastructure to ensure proper maintenance and repairs. Establishing this support network for electric trucks is a challenge, especially given that electric truck adoption is still in the early stages.
- Residual Value and Lifecycle Costs: Uncertainty around the residual value of electric trucks and their total lifecycle costs presents challenges for fleet operators. As the technology evolves rapidly, fleet operators need to assess the long-term financial viability and return on investment of electric trucks as compared to conventional diesel trucks.
- Regulatory and Policy Environment: Government regulations and policies play a significant role in the adoption of electric trucks. Fleet operators must navigate complex regulations regarding vehicle specifications, incentives, charging infrastructure requirements and access to restricted areas. Policy stability and consistent support from

governments are crucial for fleet operators to make informed investment decisions and plan for the electrification of their fleets.

It is further noted that the proposed Project is a cargo sorting facility, not a "last-mile" distribution facility. Most of the sorted cargo would depart the Project site in tractor-trailer delivery trucks and travel on fixed routes to various distribution facilities in California, Arizona and Nevada (see Draft EIR, Appendix 5.12-1 [Draft Transportation Impact Study], Table 6). From there, "last-mile" deliveries in smaller vans and trucks would be made to homes and businesses. Therefore, the potential use of zero emission (ZE) or near-zero emission (NZE) trucks relates solely to the larger trucks involved in the distribution of cargo from the proposed Project.

Furthermore, even if the Applicant was able to fully electrify its delivery truck fleet with respect to the proposed Project, that would not reduce the proposed Project's regional operational air quality emissions to a less-than-significant level. As shown in Table 5.2-13 (Daily Operational Emissions – Project Phase 2 Compared to Baseline) in Section 5.2: Air Quality in the Draft EIR, the combined Phases 1 and 2 of the proposed Project would have a significant impact with respect to daily operational emissions of CO, VOC, NO_x. and SO_2. The total daily operational emissions of CO would be 2,223 pounds/day, while the significance threshold is 550 pounds/day. Of those total emissions, delivery trucks would only contribute 26 pounds/day. Therefore, if all delivery trucks were electrically powered, the total daily operational emissions of CO would be reduced from 2,223 to 2,197 pounds/day, still well above the significance threshold of 550 pounds/day.

Similarly, the total daily operational missions of VOC would be 373 pounds/day, while the significance threshold is 55 pounds/day. Of those total emissions, delivery trucks would contribute less than 1 pound/day. Therefore, if all delivery trucks were electrically powered, the total daily operational emissions of VOC would be reduced from 373 to approximately 372 pounds/day, still well above the significance threshold of 55 pounds/day.

Next, the total daily operational emissions of NO_x would be 2,565 pounds/day, while the significance threshold is 55 pounds/day. Of those total emissions, delivery trucks would only contribute 2 pounds/day. Therefore, if all delivery trucks were electrically powered, the total daily operational missions of VOC would be reduced from 2,565 to 2,563 pounds/day, still well above the significance threshold of 55 pounds/day.

Finally, the total daily operational emissions of SO_2 would be 173 pounds/day, while the significance threshold is 150 pounds/day. Of those total emissions, delivery trucks would contribute less than 1 pound/day. Therefore, if all delivery trucks were electrically powered, the

total daily operational emissions of SO_2 would be reduced from 173 to approximately 172 pounds/day, still well above the significance threshold of 150 pounds/day.

Turning to the proposed Project's GHG emissions, even if the Applicant was able to fully electrify its delivery truck fleet with respect to the proposed Project, that would not reduce the proposed Project's GHG emissions to a less-than-significant level. As shown in Table 5.7-6 (Estimated Operational GHG Emissions for the Proposed Project ($MTCO_2e$) – With Project Compared to Baseline) in Section 5.7: Greenhouse Gas Emissions in the Draft EIR, the proposed Project would have a significant impact with respect to total construction and operational GHG annual emissions. The total emissions for the overall Project would be 128,057 $MTCO_2e$. Of those emissions, delivery trucks would only contribute 2,064 $MTCO_2e$ to the proposed Project's overall GHG emissions (or approximately 1.6%). These minor reductions would not mitigate the proposed Project's GHG emissions to a less-than-significant level.

The Advocates for the Environment comment letter (see **Comment H-9**) relatedly suggests a mitigation measure with respect to on-site vehicles and equipment, as follows:

> *To reduce GHGs, the lead agency could limit vehicles by prohibiting the use of diesel-powered machinery and vehicles and emphasizing requiring Zero Emission Vehicle (ZEV) use on site [sic]. Primarily, the lead agency can make prospective tenants agree to maintain a hybrid, or even fully electrified vehicle fleet which powers itself through solar panels on the warehouse site.*

The proposed Project already includes project design features that address this comment. First, PDF AQ-3, which is set forth on page 5.2-64 in Section 5.2: Air Quality in the Draft EIR and in **Table TR-1** above, provides that "Ground Support Equipment (GSE), including (but not limited to) aircraft tugs, baggage tugs, belt loaders, cargo loaders, forklifts, and ground power units, ramp support carts/vans, that service aircrafts shall be electric by Phase 2." As noted on page 5.2-64 in Section 5.2: Air Quality in the Draft EIR, the reduction in air pollutants associated with the electrification of the GSE was taken into account in determining the operational air quality emissions associated with the proposed Project. The text following PDF AQ-3 states that PDF AQ-3 "results in the avoidance of 0.7 tons of VOC, 1.7 tons of CO, 1.6 tons of NO_x, and 0.1 tons of PM_{10} and $PM_{2.5}$ compared to the use of diesel fueled ground support equipment." As relatedly noted on page 5.7-34 in Section 5.7: Greenhouse Gas Emissions in the Draft EIR, PDF AQ-3 "results in the avoidance of 920 metric tons of CO_2e annually compared to the use of diesel fueled ground support equipment."

It is the Applicant's goal to use all-electric machinery and equipment for Phase 1 of the Project. However, there is a concern as to whether Southern California Edison (SCE) would be able to provide sufficient electric power to achieve that goal by the time Phase 1 was constructed and commenced operation, and SCE has not provided confirmation that sufficient electric power would be available at the time Phase 1 is completed. To account for this circumstance and provide adequate time for SCE to enhance its power supply, which is beyond the Applicant's control, PDF AQ-3 requires electrification of the overall Project at the time Phase 2 has been constructed and commences operation.

Second, the proposed Project does include a solar panel array to provide electricity for on-site operations. As discussed in more detail in **Response to Comment H-11**, PDF GHG-2, which is set forth on page 5.7-35 in Section 5.7: Greenhouse Gas Emissions in the Draft EIR, provides that "[t]he proposed Project shall include a 1.5-Megawatt Solar PV Panel System on the rooftop of the Air Cargo Sort Building and Parking Structure." As discussed in the Final EIR, the proposed Project's Solar PV Panel System has been increased from 1.5 to 3.8 Megawatts of capacity. With this increase in capacity, the Project's GHG emission reductions with respect to the inclusion of the solar panel system would increase from approximately 3,750 metric tons to approximately 9,450 metric tons, as discussed in **Response to Comment H-9**.

It Is further noted that, as described in PDF AQ-4, the proposed Project would include electric cargo aircraft in its fleet, consistent with the Applicant's global sustainability program. Specifically, PDF AQ-4, which is set forth on page 5.2-64 in Section 5.2: Air Quality in the Draft EIR, states that "[a] portion of the proposed Project's aircraft fleet shall include electric cargo aircraft. (See Table 3.4 in Section 3.0: Project Description)" Table 3.4, in turn, states that 6 of the 66 Project aircraft operations would occur with Alice Electric cargo airplanes. As noted on Page 5.2-65 in Section 5.2: Air Quality in the Draft EIR, PDF AQ-4""results in the avoidance of 3.8 tons of VOC, 23.0 tons of CO, 25.5 tons of NO_x, and 0.2 tons of PM_{10} and $PM_{2.5}$ compared to the use of jet-fueled aircraft similar to the project fleet"" And, as noted on page 5.7-34 in Section 5.7: Greenhouse Gas Emissions in the Draft EIR, PDF AQ-4""results in the avoidance of 4,400 metric tons of CO_2e annually compared to the use of jet fueled aircraft similar to the project fleet"" The civil operation of Alice Electric cargo aircraft is subject to FAA certification. For that reason, a footnote has been added in Table 3.4 in Section 3.0: Project Description in the Draft EIR to clarify that the inclusion of Alice Electric cargo aircraft as part of the proposed Project fleet is subject to its certification by the FAA. Please see **Section 2.0: Additions and Corrections** in this Final EIR.

In summary, the Applicant has a strong commitment to sustainability as exemplified by the PDFs that have been incorporated into the Project and the MMs recommended in this Final EIR.

Governor Gavin Newsom

State of California
Governor's Office of Planning and Research
1400 10th Street. Sacramento, California, 95814
info@opr.ca.gov | opr.ca.gov

Director Sam Assefa

OIAA Administrative Offices
Attn: Kevin Keith
1923 East Avion Street
Ontario, CA 91761

March 15, 2023

To Whom it May Concern,

Our office has received your mailed Public Notice for the following project: **Ontario International Airport South Airport Cargo Center Project, SCH# 2021100226.**

Please note that we no long accept mailed hard copies of Public Notices. Future notices can be sent to us through email at state.clearinghouse@opr.ca.gov.

Our staff confirmed that the above-mentioned project was uploaded to CEQAnet, and that the Public Notice was included online. There is no need to send this notice through email, as it has already been uploaded to the correct project in CEQAnet.

We appreciate your understanding. Please reach out to us with any questions.

A-1

Thank you,

State Clearinghouse

state.clearinghouse@opr.ca.gov

916-445-0613

ONTARIO INTERNATIONAL AIRPORT

Governor's Office of Planning & Research
MAR 15 2023
STATE CLEARINGHOUSE

DATE: MARCH 13, 2023

SUBJECT: **Notice of Availability (NOA) of Draft Environmental Impact Report (EIR)**

PROJECT TITLE: **Ontario International Airport South Airport Cargo Center Project**

SCH# 2021100220

The Ontario International Airport Authority (OIAA), as the Lead Agency, has prepared a Draft EIR for the Proposed South Airport Cargo Center Project (proposed Project). The Draft EIR has been prepared to assess the potential environmental effects of the proposed Project in compliance with the California Environmental Quality Act (CEQA) (Public Resources Code Sections 21000 et seq.) and State Guidelines for the Implementation of the CEQA of 1970 (CEQA Guidelines), as amended (California Code of Regulations, Sections 15000 et seq.).

PROJECT DESCRIPTION: The Project site encompasses approximately 97 acres located in the southern half of the Ontario International Airport (Airport) immediately west of the Cucamonga Channel and north of Mission Boulevard in the City of Ontario, southwest San Bernardino County. The proposed Project involves the proposed development of aviation related facilities within the Airport boundaries and is consistent with the Ontario International Airport Layout Plan. The proposed Project would replace existing, underutilized airport-related buildings and site improvements with an air cargo center developed in two phases.

The proposed Project includes a cargo sorting building (Air Cargo Sort Building), truckyard, parking facilities, two aviation support buildings (ground service equipment [GSE] and aircraft line maintenance buildings), and aircraft apron improvements. The Air Cargo Sort Building, proposed north of East Avion Street, would be surrounded to the west, north, and east by the aircraft parking apron. A ground-level visitor parking lot and truckyard are proposed on the south side of the cargo building. A parking structure for employees is proposed south of East Avion Street, with a pedestrian bridge connecting the parking structure to the office building. A new electrical substation to provide power to the proposed Project would be located to the west of the parking structure. Fire lanes would be located around the substation and parking structure.

ONTARIO
INTERNATIONAL AIRPORT

FECHA: 13 de marzo de 2023

ASUNTO: Aviso de Disponibilidad (NOA) del Borrador del Informe de Impacto Ambiental (EIR)

TÍTULO DEL PROYECTO: Aeropuerto Internacional de Ontario, Proyecto del Centro de Carga del Aeropuerto Sur

La Autoridad del Aeropuerto Internacional de Ontario (OIAA), como organismo principal, ha preparado un Borrador de EIR para el Proyecto del Centro de Carga del Aeropuerto Sur Propuesto (Proyecto propuesto). El Borrador del EIR ha sido preparado para evaluar los efectos ambientales potenciales del Proyecto propuesto en cumplimiento con la Ley de Calidad Ambiental de California (CEQA) (Código de Recursos Públicos, Secciones 21000 y siguientes) y las Pautas Estatales para la Implementación de la CEQA de 1970 (Directrices CEQA), según enmendado (Código de Regulaciones de California, Secciones 15000 y siguientes).

DESCRIPCIÓN DEL PROYECTO: El sitio del Proyecto abarca aproximadamente 97 acres ubicados en la mitad sur del Aeropuerto Internacional de Ontario (Aeropuerto) inmediatamente al oeste del Canal Cucamonga y al norte de Mission Boulevard en la ciudad de Ontario, suroeste del condado de San Bernardino. El Proyecto propuesto involucra el desarrollo propuesto de instalaciones relacionadas con la aviación dentro de los límites del Aeropuerto y es consistente con el Plan de Distribución del Aeropuerto Internacional de Ontario. El Proyecto propuesto reemplazaría los edificios relacionados con el aeropuerto subutilizados existentes y las mejoras del sitio con un centro de carga aérea desarrollado en dos fases.

El Proyecto propuesto incluye un edificio de clasificación de carga (Edificio de clasificación de carga aérea), patio de camiones, instalaciones de estacionamiento, dos edificios de apoyo a la aviación (equipo de servicio en tierra [GSE] y edificios de mantenimiento de líneas de aeronaves) y mejoras en la plataforma de aeronaves. El Air Cargo Sort Building, propuesto al norte de East Avion Street, estaría rodeado al oeste, norte y este por la plataforma de estacionamiento de aeronaves. Se propone un estacionamiento para visitantes a nivel del suelo y un patio de camiones en el lado sur del edificio de carga. Se propone una estructura de estacionamiento para empleados al sur de East Avion Street, con un puente peatonal que conecta la estructura de estacionamiento con el edificio de oficinas. Una nueva subestación eléctrica para proporcionar energía al Proyecto propuesto estaría ubicada al oeste de la estructura de estacionamiento. Los carriles contra incendios se ubicarían alrededor de la subestación y la estructura de estacionamiento.

COMMENT LETTER A

State Clearinghouse
March 15, 2023

Comment A-1:

Our office has received your mailed Public Notice for the following project: Ontario International Airport South Airport Cargo Center Project, SCH# 2021100226. Please note that we no long accept mailed hard copies of Public Notices. Future notices can be sent to us through email at state.clearinghouse@.opr.ca.gov. Our staff confirmed that the above-mentioned project was uploaded to CEQAnet, and that the Public Notice was included online. There is no need to send this notice through email, as it has already been uploaded to the correct project in CEQAnet. We appreciate your understanding. Please reach out to us with any questions.

Response A-1:

This comment does not address the information or analysis in the Draft EIR, and, for this reason, no further response is provided.

From: Danica Nguyen <dnguyen1@aqmd.gov>
Sent: Wednesday, March 29, 2023 10:01 AM
To: Keith, Kevin <kkeith@flyontario.com>
Cc: Sam Wang <swang1@aqmd.gov>
Subject: Technical Data Request: Proposed Ontario International Airport South Airport Cargo Center Project

Dear Mr. Keith,

South Coast AQMD staff received the Draft Environmental Report (Draft EIR) for the Proposed Ontario International Airport South Airport Cargo Center Project (South Coast AQMD Control Number: SBC230322-02). Staff is currently in the process of reviewing the Draft EIR. The public commenting period is from 03/13/2023 – 04/27/2023.

Upon reviewing the files provided as part of the public review period, I was able to access the Draft EIR and Appendices via the provided link.

Please provide all technical documents related to air quality, health risk, and GHG analyses, electronic versions of all emission calculation files, and air quality modeling and health risk assessment files (complete files, not summaries) that were used to quantify the air quality impacts from construction and/or operation of the Proposed Project as applicable, including the following:

- CalEEMod Input Files (.csv or.json files);
- EMFAC output files (not PDF files);
- All emission calculation spreadsheet file(s) (not PDF files) used to calculate the Project's emission sources (i.e., truck operations);
- AERMOD Input and Output files, including AERMOD View file(s) (.isc);
- Any HARP Input and Output files and/or cancer risk calculation files (excel file(s); not PDF) used to calculate cancer risk and chronic and acute hazards from the Project;
- Any files related to post-processing done outside AERMOD to calculate pollutant-specific concentrations (if applicable).

B-1

You may send the files mentioned above via a Dropbox link which may be accessed and downloaded by South Coast AQMD staff **by COB on Wednesday, 04/05/2023**. Without all files and supporting documentation, South Coast AQMD staff will be unable to complete a review of the air quality analyses promptly. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.

If you have any questions regarding this request, please don't hesitate to contact me.

Regards,

Danica Nguyen
Air Quality Specialist, CEQA-IGR
Planning, Rule Development & Implementation
South Coast Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765
Phone: (909) 396-3531
E-mail: dnguyen1@aqmd.gov

Please note South Coast AQMD is closed on Mondays.

COMMENT LETTER B

SCAQMD
Danica Nguyen, Air Quality Specialist
March 29, 2023

Comment B-1:

SCAQMD staff received the Draft Environmental Report (Draft EIR) for the Proposed Ontario International Airport South Airport Cargo Center Project (SCAQMD Control Number: SBC230322-02). Staff is currently in the process of reviewing the Draft EIR. The public commenting period is from 03/13/2023 – 04/27/2023. Upon reviewing the files provided as part of the public review period, I was able to access the Draft EIR and Appendices via the provided link. Please provide all technical documents related to air quality, health risk, and GHG analyses, electronic versions of all emission calculation files, and air quality modeling and health risk assessment files (complete files, not summaries) that were used to quantify the air quality impacts from construction and/or operation of the Proposed Project as applicable, including the following:

- CalEEMod Input Files (.csv or.json files);
- EMFAC output files (not PDF files);
- All emission calculation spreadsheet file(s) (not PDF files) used to calculate the Project's emission sources (i.e., truck operations);
- AERMOD Input and Output files, including AERMOD View file(s) (.isc);
- Any HARP Input and Output files and/or cancer risk calculation files (excel file(s); not PDF) used to calculate cancer risk and chronic and acute hazards from the Project;
- Any files related to post-processing done outside AERMOD to calculate pollutant-specific concentrations (if applicable).

You may send the files mentioned above via a Dropbox link which may be accessed and downloaded by SCAQMD staff by COB on Wednesday, 04/05/2023. Without all files and supporting documentation, SCAQMD staff will be unable to complete a review of the air quality analyses promptly. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period. If you have any questions regarding this request, please don't hesitate to contact me.

Response B-1:

The electronic files requested in the comment were transmitted to SCAQMD on April 5, 2023 and confirmation of receipt was received from SCAQMD. No further response is necessary.

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL: April 25, 2023
kkeith@flyontario.com
Kevin Keith, Director of Planning
Ontario International Airport Authority Administration Offices
1923 East Avion Street
Ontario, California 91761

Draft Environmental Impact Report (Draft EIR) for the Proposed Ontario International Airport South Airport Cargo Center Project (Proposed Project) (SCH No. 2021100226)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The Ontario International Airport Authority (OIAA) is the Lead Agency under the California Environmental Quality Act (CEQA) for the Proposed Project. The following comments recommended revisions to the overlapped construction and operational activities analysis, baseline condition, additional recommended air quality and greenhouse gas mitigation measures, and information on South Coast AQMD permits and responsible agency that the Lead Agency should include in the Final EIR.

South Coast AQMD Staff's Summary of Project Information in the Draft EIR
Based on the Draft EIR, the Proposed Project would replace existing, underutilized airport-related buildings and site improvements with an air cargo center.[1] The Proposed Project development on a 97 acres site[2] includes an Air Cargo Sort Building, truckyard, parking facilities, two aviation-supporting buildings (ground service equipment GSE and aircraft line maintenance buildings), and aircraft apron improvements.[3] The Proposed Project would be implemented in two phases: Phase 1 takes place on the easternmost 62 acres and Phase 2 on the remaining western 35 acres.[4] The detailed construction component of each Phase is summarized below[5]:

C-1

Phase 1

- 508,675 square feet within Cargo Sort Facility
- 27,000 square feet within Aviation Line Maintenance Garage
- 101,500 square feet within Cargo Sort Facility Office
- 7,000 square feet within South Secure Airport Access Point
- 2,047,320 square feet of aircraft apron
- 900 parking spaces and 271,000 square feet within parking garage
- 33 parking spaces and 15,300 square feet within surface parking lot

[1] Draft EIR. Page 3.0-2.
[2] *Ibid*. Page 3.0-1.
[3] *Ibid*. Page 3.0-2.
[4] *Ibid*.
[5] *Ibid*. Appendix 5.02-1. Air Quality Technical Report. Pages 31, 32, and 33 of 82.

- 39 truck docks and 122,200 square feet within truck yard area
- Project area of 62 acres (including parking garage of four acres)

Phase 2

- 246,825 square feet within Cargo Sort Facility
- 27,000 square feet within GSE Maintenance Building
- 1,045,440 square feet of aircraft apron
- 28 truck docks and 87,800 square feet within truck yard area
- Project area of 35 acres

C-1 cont'd

There are 67 truck doors[6] on the ground level associated with 672 truck trips per day for Phase 1 and Phase 2 combined.[7] Most of the Proposed Project is located north of East Avion Street, with the remainder between East Avion Street and Mission Boulevard west of South Hellman Avenue.[8] In addition, according to the provided maps in the Draft EIR, the Proposed Project site is in the southern-central of the Ontario International Airport. Based on the aerial photographs, South Coast AQMD finds that the sensitive receptors (e.g., residence, school) are more than 1,000 feet away from the Proposed Project. The construction of Phase 1 is expected to start in the third quarter of 2023 and be completed by the third quarter of 2025 when the proposed air cargo flight operations at the Airport will begin.[9] The construction of Phase 2 is anticipated to start in the third quarter of 2027 and be completed by 2029.[10]

South Coast AQMD Staff's Comments on the Draft EIR

Overlapped Construction and Operational Activities Analysis

According to the Draft EIR, Phase 1 construction would be completed by the third quarter of 2025 when the air cargo flight operation begins,[11] while Phase 2 construction would start in the third quarter of 2027.[12] Hence, the possibility of overlapping construction (Phase 2) and operation (Phase 1) activities is likely to occur. However, the Draft EIR does not include an emissions analysis for these potential overlapped activities. Therefore, South Coast AQMD staff recommends that the Lead Agency revise the air quality analysis to include the analysis from overlapped activities to estimate emissions associated during the time. The estimated overlapped emissions should then be compared to South Coast AQMD's regional air quality CEQA operational thresholds to determine their significance level, and the results should be included in the Final EIR. If the overlapped emissions analysis is not included in the Final EIR, the Lead Agency should provide reasons for not having them supported by substantial evidence in the record.

C-2

[6] *Ibid*. Page 3.0-12.
[7] *Ibid*. Page 5.12-35.
[8] *Ibid*. Page 3.0-1.
[9] *Ibid*. Page 3.0-33.
[10] *Ibid*. Page 3.0-34.
[11] *Ibid*. Page 3.0-33.
[12] *Ibid*. Page 3.0-34.

Baseline Conditions

Based on the Draft EIR, the baseline condition utilized in the analysis is the hybrid 2019/2020 year, where 2019 represents the passenger air carriers, air taxi, and general aviation operation levels, while 2020 is for Ontario's air cargo and other aviation operation levels (as 2021 data was not readily available at the time the NOP was issued).[13] The baseline condition year is chosen as it relates to the air quality, greenhouse gas (GHG), and noise environment.[14] However, South Coast AQMD staff found the inconsistency between Draft IER and Appendix 5.02-1: Air Quality Technical Report when discussing the baseline conditions used for the analysis. The baseline condition defined in Appendix 5.02-1 is 2021,[15] even though the explanation is still referred to 2019 and 2020. Thus, South Coast AQMD staff recommends that the Lead Agency review and revise the baseline condition discussion throughout the Draft EIR and Appendix 5.02-1 with accurate and consistent information to avoid discrepancies and include the revision in the Final EIR. If the revision is not included in the Final EIR, the Lead Agency should provide reasons for not having them supported by substantial evidence in the record.

C-3

Additional Recommended Air Quality and Greenhouse Gas Mitigation Measures

According to the Draft EIR, the Lead Agency concludes that the Proposed Project's regional operational emissions and GHG emissions would be significant and unavoidable, even with incorporating Project Design Features PDF AQ-3 through PDF AQ-8, PDF GHG-1, PDF GHG-2, mitigation measures MM AQ-4 through MM AQ-7, MM TRANS-1 through MM-TRANS-5.[16]

Mitigation measures for operational air quality impacts from mobile sources that the Lead Agency should consider in the Final EIR may include the following:

- Require zero-emissions (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. Given the state'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[17] and the Heavy-Duty Low NOx Omnibus Regulation[18], ZE and NZE trucks will become increasingly more available to use. The Lead Agency should require a phase-in schedule to incentivize using these cleaner operating trucks to reduce any significant adverse air quality impacts. South Coast AQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency.

C-4

[13] *Ibid*. Page 4.0-4.
[14] *Ibid*.
[15] *Ibid*. Appendix 5.02-1. Air Quality Technical Report. Page 1 of 82.
[16] *Ibid*. Page 1.0.7.
[17] CARB. June 25, 2020. *Advanced Clean Trucks Rule*. Accessed at: https://ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks.
[18] CARB has recently passed a variety of new regulations that require new, cleaner heavy-duty truck technology to be sold and used in state. For example, on August 27, 2020, CARB approved the Heavy-Duty Low NOx Omnibus Regulation, which will require all trucks to meet the adopted emission standard of 0.05 g/hp-hr starting with engine model year 2024. Accessed at: https://ww2.arb.ca.gov/rulemaking/2020/hdomnibuslownox.

At a minimum, require the use of the 2010 model year[19] that meets CARB's 2010 engine emissions standards at 0.01 g/bhp-hr of particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks. Where appropriate, include environmental analyses to evaluate and identify sufficient electricity and supportive infrastructures in the Energy and Utilities and Service Systems Sections in the CEQA document. Include the requirement in applicable bid documents, purchase orders, and contracts. Operators shall maintain records of all trucks associated with project construction to document that each truck used meets these emission standards and make the records available for inspection. The Lead Agency should conduct regular inspections to the maximum extent feasible to ensure compliance.

- Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the Final CEQA document. 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.
- Provide electric vehicle (EV) charging stations or, at a minimum, provide the electrical infrastructure, and electrical panels should be appropriately sized. Electrical hookups should be provided for truckers to plug in any onboard auxiliary equipment.

C-4 cont'd

Mitigation measures for operational air quality impacts from other area sources that the Lead Agency should consider in the Final EIR may include the following:

- Maximize the use of solar energy by installing solar energy arrays
- Use light-colored paving and roofing materials
- Utilize only Energy Star heating, cooling, and lighting devices, and appliances
- Use of water-based or low-VOC cleaning products that go beyond the requirements of South Coast AQMD Rule 1113

C-5

Design considerations for the Proposed Project that the Lead Agency should consider including in the Final EIR to further reduce air quality and health risk impacts include the following:

- 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.)
- 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
- Design the Proposed Project such that any check-in point for trucks is inside the Proposed Project site to ensure that no trucks are queuing outside
- Design the Proposed Project to ensure that truck traffic inside the Proposed Project site is as far away as feasible from sensitive receptors
- Restrict overnight truck parking in sensitive land uses by providing overnight truck parking inside the Proposed Project site

C-6

[19] CARB adopted the statewide Truck and Bus Regulation in 2010. The Regulation requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent. More information on the CARB's Truck and Bus Regulation is available at: https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm.

South Coast AQMD staff also suggests the Lead Agency review the below references and consider including any feasible additional recommended mitigation measures in the Final EIR:

- State of California – Department of Justice: Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act[20]
- South Coast AQMD 2022 South Coast Air Quality Management Plan,[21] specifically:
  - Appendix IV-A – South Coast AQMD's Stationary and Mobile Source Control Measures
  - Appendix IV-B – CARB's Strategy for South Coast
  - Appendix IV-C – SCAG's Regional Transportation Strategy and Control Measures
- United States Environmental Protection Agency (U.S. EPA): Mobile Source Pollution - Environmental Justice and Transportation[22]

C-7

South Coast AQMD Permits and Responsible Agency

As mentioned in the Draft EIR, an emergency power system would be installed with six (6) 2,200-kilovolt-ampere (kVA) diesel engine generators (four in Phase 1 and two in Phase 2); thus, permits from South Coast AQMD are required to construct and operate. Therefore, the Lead Agency should use good faith effort to include a discussion of any equipment utilized in the Proposed Project's construction and operation that will require South Coast AQMD permits and identify South Coast AQMD as a Responsible Agency in the Final EIR. Any assumptions for the stationary sources in the Final EIR will also be used as the basis for the permit conditions and limits for the Proposed Project. Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions on permits. For more general information on permits, please visit South Coast AQMD's webpage at: http://www.aqmd.gov/home/permits.

C-8

Conclusion

Pursuant to California Public Resources Code section 21092.5(a) and CEQA Guidelines section 15088(b), South Coast AQMD staff requests that the Lead Agency provide South Coast AQMD staff with written responses to all comments contained herein, at least 10 days prior to the certification of the Final EIR.[23] In addition, issues raised in the comments should be addressed in detail, giving reasons why specific comments and suggestions are not accepted. There should be good faith and reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines section 15088(c)). Conclusory statements do not

C-9

[20] State of California – Department of Justice. Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act. Access at: https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf
[21] 2022 South Coast AQMP. Access at: http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan
[22] United States Environmental Protection Agency (U.S. EPA): Mobile Source Pollution - Environmental Justice and Transportation. Access at: https://www.epa.gov/mobile-source-pollution/environmental-justice-and-transportation
[23] 2022 CEQA Statues and Guidelines section 21092.5(a): "At least ten days prior to certifying an environmental impact report, the lead agency shall provide a written proposed response to a public agency on comments made by that agency which conform with the requirements of this division. Proposed responses shall conform with the legal standards established for responses to comments on draft environmental impact reports. Copies of responses or the environmental document in which they are contained, prepared in conformance with other requirements of this division and the guidelines adopted pursuant to Section 21083, may be used to meet the requirements imposed by this section." Access at: https://www.califaep.org/docs/2022_CEQA_Statue_and_Guidelines.pdf

Kevin Keith April 25, 2023

facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision-makers and to the public who are interested in the Proposed Project.

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

C-9 cont'd

Sincerely,

Sam Wang

Sam Wang
Program Supervisor, CEQA IGR
Planning, Rule Development & Implementation

SW:DN
SBC230322-02
Control Number

COMMENT LETTER C

SCAQMD
Sam Wang, Program Supervisor
April 25, 2023

Comment C-1:

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The Ontario International Airport Authority (OIAA) is the Lead Agency under the California Environmental Quality Act (CEQA) for the Proposed Project. The following comments recommended revisions to the overlapped construction and operational activities analysis, baseline condition, additional recommended air quality and greenhouse gas mitigation measures, and information on South Coast AQMD permits and responsible agency that the Lead Agency should include in the Final EIR.

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

Based on the Draft EIR, the Proposed Project would replace existing, underutilized airport-related buildings and site improvements with an air cargo center. The Proposed Project development on a 97 acres site includes an Air Cargo Sort Building, truckyard, parking facilities, two aviation-supporting buildings (ground service equipment GSE and aircraft line maintenance buildings), and aircraft apron improvements. The Proposed Project would be implemented in two phases: Phase 1 takes place on the easternmost 62 acres and Phase 2 on the remaining western 35 acres. The detailed construction component of each Phase is summarized below:

Phase 1

- 508,675 square feet within Cargo Sort Facility
- 27,000 square feet within Aviation Line Maintenance Garage
- 101,500 square feet within Cargo Sort Facility Office
- 7,000 square feet within South Secure Airport Access Point
- 2,047,320 square feet of aircraft apron
- 900 parking spaces and 271,000 square feet within parking garage
- 33 parking spaces and 15,300 square feet within surface parking lot
- 39 truck docks and 122,200 square feet within truck yard area
- Project area of 62 acres (including parking garage of four acres)

Phase 2

- 246,825 square feet within Cargo Sort Facility
- 27,000 square feet within GSE Maintenance Building

- 1,045,440 square feet of aircraft apron
- 28 truck docks and 87,800 square feet within truck yard area
- Project area of 35 acres

There are 67 truck doors on the ground level associated with 672 truck trips per day for Phase 1 and Phase 2 combined. Most of the Proposed Project is located north of East Avion Street, with the remainder between East Avion Street and Mission Boulevard west of South Hellman Avenue. In addition, according to the provided maps in the Draft EIR, the Proposed Project site is in the southern-central of the Ontario International Airport. Based on the aerial photographs, South Coast AQMD finds that the sensitive receptors (e.g., residence, school) are more than 1,000 feet away from the Proposed Project. The construction of Phase 1 is expected to start in the third quarter of 2023 and be completed by the third quarter of 2025 when the proposed air cargo flight operations at the Airport will begin. The construction of Phase 2 is anticipated to start in the third quarter of 2027 and be completed by 2029.

Response C-1:

This introductory comment describes the content of the letter and contains a summary of the project description in the Draft EIR. This comment does not address the analysis of the potential environmental impacts of the proposed Project and no response is required for this reason. However, it is noted that, should the proposed Project be delayed in its implementation, the analysis of the proposed Project's construction and operational impacts in the Draft EIR would provide a conservative analysis as emissions would be higher in earlier years. This is because the pertinent modeling platforms use higher emission factors in earlier calendar years, as the evolving regulatory and technological frameworks continue to reduce the intensity of various emissions-generating activities over time. Any potential delay in the construction of Phases 1 and 2 and implementation of the proposed Project to later years, therefore, would not result in environmental consequences of concern as to air quality and GHG emissions.

Comment C-2:

Overlapped Construction and Operational Activities Analysis

According to the Draft EIR, Phase 1 construction would be completed by the third quarter of 2025 when the air cargo flight operation begins, while Phase 2 construction would start in the third quarter of 2027. Hence, the possibility of overlapping construction (Phase 2) and operation (Phase 1) activities is likely to occur. However, the Draft EIR does not include an emissions analysis for these potential overlapped activities. Therefore, South Coast AQMD staff recommends that the Lead Agency revise the air quality analysis to include the analysis from overlapped activities to estimate emissions associated during the time. The estimated overlapped emissions should then be compared to South Coast AQMD's regional air quality CEQA operational thresholds to

determine their significance level, and the results should be included in the Final EIR. If the overlapped emissions analysis is not included in the Final EIR, the Lead Agency should provide reasons for not having them supported by substantial evidence in the record.

Response C-2:

The Draft EIR provided both Phase 1 and Phase 2 construction and operations emissions analysis for the proposed Project. An analysis of overlapping Phase 1 operations and Phase 2 construction is provided in this response per SCAQMD's request. As described below, the air quality impact conclusions under this overlapped analysis remain the same as those disclosed in the Draft EIR.

The following information is provided to compare the overlapping Phase 1 operational and Phase 2 construction emissions to the appropriate thresholds.

- During Phase 1 construction there are no overlapping operations. Phase 1 construction would commence and be completed prior to Phase 1 operations.
- Following completion of Phase 1 construction activities, Phase 1 operations are expected to commence in 2025.
- Phase 2 construction activities are estimated to begin in September of 2025 (demolition), December of 2026 (site preparation), and August of 2027 (building construction), with completion in August of 2028.
- Phase 2 would become operational in 2029.
- Therefore, while Phase 1 operations occur (starting in 2025), the construction activities associated with Phase 2 would also occur (from 2025 through 2028).
- Phase 2 operations commence in 2029, at which time there would be no overlapping construction activities.

In response to SCAQMD's request, the construction and operational emissions that overlap in time were reviewed. As background, the relevant Draft EIR tables for the construction and operational emissions inventories are the following:

- Table 5.2-10: Maximum Daily Construction Emissions – Phase 1 shows the Project's estimated maximum daily emissions for construction-related activities (including combustion engine and fugitive dust emissions) for Phase 1 construction.
- Table 5.2-11: Maximum Daily Construction Emissions – Phase 2 shows the Project's estimated maximum daily emissions for construction-related activities (including combustion engine and fugitive dust emissions) for Phase 2 construction.

- Table 5.2-12: Estimated Daily Operational Emissions – Project Phase 1 Compared to Baseline presents the daily criteria air pollutant emissions when compared With Project to the Baseline Condition during Phase 1.
- Table 5.2-13: Estimated Daily Operational Emissions – Project Phase 2 Compared to Baseline presents the daily criteria air pollutant emissions when compared With Project to the Baseline Condition.

Table C-1: Estimated Maximum Daily Overlapping Construction and Operations Emissions (Pounds) below shows the overlapping construction and operational emissions during the period of 2025 through 2029. Project construction and operational emissions during the overlapping period would exceed SCAQMD significance thresholds for CO, nOx, and VOC, but would be less than SCAQMD significance thresholds for SO_2, PM_{10}, and $PM_{2.5}$.

TABLE C-1
ESTIMATED MAXIMUM DAILY OVERLAPPING CONSTRUCTION AND OPERATIONS EMISSIONS (POUNDS)

Year	Condition	CO	VOC	NO_x	SO_2	PM_{10}	$PM_{2.5}$
2025	Phase 2 Construction	58.5	1.56	9.27	0.13	26.9	4.30
	Phase 1 Operation	1,571	259	1,451	104	11.3	9.94
	Total	**1,630**	**261**	**1,460**	**104**	**38.2**	**14.2**
2026	Phase 2 Construction	58.5	1.56	11.7	0.13	6.34	3.16
	Phase 1 Operation	1,571	259	1,451	104	11.3	9.94
	Total	**1,630**	**261**	**1,463**	**104**	**17.6**	**13.1**
2027	Phase 2 Construction	76.8	2.29	11.6	0.16	6.35	3.17
	Phase 1 Operation	1,571	259	1,451	104	11.3	9.94
	Total	**1,648**	**261**	**1,463**	**104**	**17.7**	**13.1**
2028	Phase 2 Construction	93.4	3.13	17.4	0.21	7.15	2.13
	Phase 1 Operation	1,571	259	1,451	104	11.3	9.94
	Total	**1,664**	**262**	**1,468**	**104**	**18.5**	**12.1**
Significance Thresholds		**550**	**55**	**55**	**150**	**150**	**55**
Significant?		**Yes**	**Yes**	**Yes**	No	No	No

Note: Numbers in the Draft EIR were rounded to the whole number.

This impact conclusion for overlapping Phase 1 operations and Phase 2 construction activities is the same as reported in the Draft EIR for the proposed Project's buildout (both Phase 1 and

Phase 2) operational impacts. Specifically, as shown in **Table C-2: Comparison of Overlapping Construction and Operations Emissions and Buildout Operational Emissions**, below, the combined construction and operational emissions are not significantly different than the maximum emissions results presented in Table 5.2-13 for buildout of the proposed Project (both Phase 1 and Phase 2) in Section 5.2 of the Draft EIR. Minimal change would occur in the air quality impacts and, therefore, no additional mitigation is necessary. Similar significant impacts would occur as a result of the overlapping construction and operational emissions when compared to the impacts disclosed in the Draft EIR, and the overlapping construction and operational activities do not substantially increase the severity of the significant impacts related to air quality.

TABLE C-2
COMPARISON OF OVERLAPPING CONSTRUCTION AND OPERATIONS EMISSIONS AND BUILDOUT OPERATIONAL EMISSIONS

Year	Condition	CO	VOC	NO_x	SO_2	PM_{10}	$PM_{2.5}$
2025	Phase 2 Construction & Phase 1 Operation	1,630	261	1,460	104	38.2	14.2
	Buildout Operation	2,223	373	2,565	173	17	16
	Difference	**-593**	**-112**	**-1,105**	**-69**	**21**	**-2**
2026	Phase 2 Construction & Phase 1 Operation	1,630	261	1,463	104	17.6	13.1
	Buildout Operation	2,223	373	2,565	173	17	16
	Difference	**-593**	**-112**	**-1,102**	**-69**	**1**	**-3**
2027	Phase 2 Construction & Phase 1 Operation	1,648	261	1,463	104	17.7	13.1
	Buildout Operation	2,223	373	2,565	173	17	16
	Difference	**-575**	**-112**	**-1,102**	**-69**	**1**	**-3**
2028	Phase 2 Construction & Phase 1 Operation	1,664	262	1,468	104	18.5	12.1
	Buildout Operation	2,223	373	2,565	173	17	16
	Difference	**-559**	**-111**	**-1,097**	**-69**	**2**	**-4**

Comment C-3:

Baseline Conditions

Based on the Draft EIR, the baseline condition utilized in the analysis is the hybrid 2019/2020 year, where 2019 represents the passenger air carriers, air taxi, and general aviation operation levels, while 2020 is for Ontario's air cargo and other aviation operation levels (as 2021 data was not readily available at the time the NOP was issued). The baseline condition year is chosen as it relates to the air quality, greenhouse gas (GHG), and noise environment. However, South Coast AQMD staff found the inconsistency between Draft IER and Appendix 5.02-1: Air Quality Technical Report when discussing the baseline conditions used for the analysis. The baseline condition defined in Appendix 5.02-1 is 2021, even though the explanation is still referred to 2019 and 2020. Thus, South Coast AQMD staff recommends that the Lead Agency review and revise the baseline condition discussion throughout the Draft EIR and Appendix 5.02-1 with accurate and consistent information to avoid discrepancies and include the revision in the Final EIR. If the revision is not included in the Final EIR, the Lead Agency should provide reasons for not having them supported by substantial evidence in the record.

Response C-3:

The 2021 Baseline Condition referred to in Appendix 5.2-1 is the same as the Baseline Condition presented in Section 5.2: Air Quality and throughout the Draft EIR. The "(2021)" parenthetical has been removed from Appendix 5.2-1 and the Final EIR. Please see **Section 2.0: Additions and Corrections** in this Final EIR.

As described in the Draft EIR, the Baseline Condition accounts for aviation activity levels that are historically representative of operations at ONT; i.e., levels that have been "normalized" to eliminate short-term depressions in activity levels attributable to the COVID-19 pandemic. To more accurately represent historically consistent existing conditions at ONT, and to avoid a potentially misleading comparison of Project impacts, the air quality and GHG emissions are described and compared using a hybrid of 2019 and 2020 operations. This is the Baseline Condition used throughout the Draft EIR.

The Baseline Condition was developed using calendar year 2019 aircraft operations with modifications to reflect increased cargo operations experienced during 2020 and continuing into 2021. The existing/base year fleet mix is a hybrid of 2019 and 2020 operations and was based on the ONT ANOMS radar data from 2019 and 2020, and FAA Traffic Flow TFMSC and OSPNET. Specifically, passenger air carriers, air taxi, and GA operations were obtained from the 2019 ANOMS data and the all-cargo operations were obtained from the 2020 ANOMS data. The military operations were obtained from the FAA TFMSC data. This approach serves to normalize operations to represent the Baseline Condition, recognizing that the temporary reduction in

passenger air carrier and air taxi operations, due to the COVIC-19 pandemic, is not indicative of baseline/existing conditions at ONT. To eliminate confusion, the Baseline Condition is defined within pages 4.0-4 through 4.0-6 in the Draft EIR and in the footnote on page 1 of the *Air Quality Technical Report* located in Appendix 5.02-1 of the Draft EIR.

Comment C-4:

Additional Recommended Air Quality and Greenhouse Gas Mitigation Measures

According to the Draft EIR, the Lead Agency concludes that the Proposed Project's regional operational emissions and GHG emissions would be significant and unavoidable, even with incorporating Project Design Features PDF AQ-3 through PDF AQ-8, PDF GHG-1, PDF GHG-2, mitigation measures MM AQ-4 through MM AQ-7, MM TRANS-1 through MM-TRANS-5.16

Mitigation measures for operational air quality impacts from mobile sources that the Lead Agency should consider in the Final EIR may include the following:

- Require zero-emissions (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. Given the state'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 to use. The Lead Agency should require a phase-in schedule to incentivize using these cleaner operating trucks to reduce any significant adverse air quality impacts. South Coast AQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency.
- At a minimum, require the use of the 2010 model year that meets CARB's 2010 engine emissions standards at 0.01 g/bhp-hr of particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks. Where appropriate, include environmental analyses to evaluate and identify sufficient electricity and supportive infrastructures in the Energy and Utilities and Service Systems Sections in the CEQA document. Include the requirement in applicable bid documents, purchase orders, and contracts. Operators shall maintain records of all trucks associated with project construction to document that each truck used meets these emission standards and make the records available for inspection. The Lead Agency should conduct regular inspections to the maximum extent feasible to ensure compliance.

- Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the Final CEQA document. 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.
- Provide electric vehicle (EV) charging stations or, at a minimum, provide the electrical infrastructure, and electrical panels should be appropriately sized. Electrical hookups should be provided for truckers to plug in any onboard auxiliary equipment.

Response C-4:

The four SCAQMD-recommended mitigation measures for operational air quality impacts from mobile sources in this comment were reviewed for both applicability and feasibility, as described below.

Regarding the recommended measure requiring zero-emissions (ZE) or near-zero emission (NZE) on-road haul trucks, the proposed Project would implement MM AQ-5 below (which has been revised as shown in **Section 2.0: Additions and Corrections** in this Final EIR and in **Topical Response 1: Sustainable Project Design Features and Mitigation Measures**).

MM AQ-5: The Applicant shall require, if and to the extent feasible, the use of zero-emission or near zero emission on-road heavy duty trucks as part of business operations beginning in 2025 (within at least 25 percent of the Project fleet).

The Applicant also shall require, if and to the extent feasible, the use of zero-emission or near zero emission on-road heavy duty trucks as part of the business operations beginning in 2029 (within at least 50 percent of the Project fleet).

Please see **Topical Response 1: Sustainable Project Design Features and Mitigation Measures** above, which discusses features of the proposed Project that will reduce mobile source-related emissions and the challenges associated with the electrification of the delivery trucks. While the State of California has adopted rules and regulations to accelerate the utilization and market penetration of ZE and NZE trucks, the referenced Topical Response addresses constraints on full-scale fleet electrification at this time. However, MM AQ-5 and the measures outlined in the **Topical Response 1: Sustainable Project Design Features and Mitigation Measures** are consistent with SCAQMD's comment and the objective of facilitating fleet turnover and the transition to electrification of the transportation sector.

SCAQMD also recommends the use of 2010 model year trucks (at a minimum) that meet CARB's 2010 engine emissions standards to further reduce operational mobile emissions. The proposed Project operations require the contracting of third-party trucking companies. Because the

Applicant does not have direct control over the third-party truck fleets, compliance with the suggested measure is practically infeasible. However, the Applicant addresses this comment through the addition of MM AQ-15. The proposed Project would implement MM AQ-15 below (which has been revised in **Section 2.0: Additions and Corrections** in this Final EIR and is outlined in **Topical Response 1: Sustainable Project Design Features and Mitigation Measures**).

> *"The Applicant shall include a provision in all operational freight hauling contracts requiring the use of 2010 model year trucks that meet CARB's 2010 engine emission standards, or newer and cleaner trucks, if and to the extent feasible.*

Further, MM AQ-4 requires all other on-site cargo-handling equipment, such as yard trucks, holsters, yard goats, pallet jacks, and similar equipment, to be electric, with the necessary electrical charging stations provided. PDF AQ-3 requires GSE, including (but not limited to) aircraft tugs, baggage tugs, belt loaders, cargo loaders, forklifts, and ground power units, ramp support carts/vans, servicing aircrafts be electric by Phase 2.

Relatedly, as discussed in Section 5.5: Energy and 5.14: Utilities in the Draft EIR, sufficient electricity and supportive infrastructure would be provided for the proposed Project and no significant impacts would result from proposed Project implementation.

As to limiting the daily number of trucks associated with operation of the proposed Project to the level analyzed in the Final EIR, the custom trip generation rates used in the Draft EIR's analysis were developed to be the best representation of the proposed Project and provide the most conservative estimates for AM, PM and daily trip generation. Based on proposed Project shift change over times, the peak proposed Project traffic is anticipated to occur in off-peak hours. However, the Traffic Study analyzed higher peak hour trip generation rates based on the empirical data to account for nontypical shifts, such as overtime.[2,3] The conservative trip generation rates analyzed in the Draft EIR are a function of the proposed Project's design, which inherently limits the proposed Project's operational capacity. The proposed Project's design

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2 The *Traffic Study* was updated in the Final EIR to correct the Synchro analysis for the LOS Opening Year (2025) Plus Phase 1 Project PM Peak Hour Scenario (see **Appendix 1.0** to this Final EIR). This correction and the updated *Traffic Study* do not change the trip generation rates or the impact conclusion in the Draft EIR.

3 Ontario International Airport Authority (OIAA). *Ontario International Airport South Airport Cargo Center Project Draft Environmental Impact Report*. SCH Number 2021100226. Appendix 5.12-1. Appendix A. Page 5. https://www.flyontario.com/our-neighbors/environment. Accessed May 2023.

features were directly accounted for in preparation of the Draft EIR's transportation analysis. Therefore, the proposed Project would operate within the trucking volumes analyzed in the Draft EIR and no further mitigation is warranted.

Finally, SCAQMD requests that the proposed Project include EV charging stations, or provide the necessary electrical infrastructure, panels, and hookups. The Draft EIR states, on Page 5.2-61, that the proposed Project would provide electric charging stations in the employee and visitor parking lots and truckyard. Further, PDF AQ-8 on Page 5.2-65 of the Draft EIR states:

> *"PDF AQ-8: The visitor parking lot shall include 29 parking stalls, 6 of which shall have access to electric charging points. The employee parking structure shall include 932 parking stalls, 300 of which shall have access to electric charging points."*[4]

In the proposed Project's truckyard, truck docks would include truck charging infrastructure as required by the applicable version of the Building Energy Efficiency Standards contained in Title 24, Part 6, of the California Code of Regulations. Additionally, a new PDF, PDF AQ-10, has been added in the Final EIR to state the proposed Project would provide electric charging stations in the truckyard (see **Section 2.0: Additions and Corrections** in this Final EIR). Please also see **Table TR-1** of **Topical Response 1: Sustainable Project Design Features and Mitigation Measures**, above.

Comment C-5:

Mitigation measures for operational air quality impacts from other area sources that the Lead Agency should consider in the Final EIR may include the following:

- Maximize the use of solar energy by installing solar energy arrays
- Use light-colored paving and roofing materials
- Utilize only Energy Star heating, cooling, and lighting devices, and appliances
- Use of water-based or low-VOC cleaning products that go beyond the requirements of South Coast AQMD Rule 1113

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4 OIAA. *Ontario International Airport South Airport Cargo Center Project Draft Environmental Impact Report*. SCH Number 2021100226. Page 5.2-65. https://www.flyontario.com/our-neighbors/environment. Accessed May 2023.

Response C-5:

The four SCAQMD-recommended mitigation measures for operational air quality impacts from other area sources in this comment were analyzed for applicability and feasibility, as described below.

As discussed on page 3.0-29 of the Draft EIR, the proposed Project's original design included a 1.5 Megawatt Solar PV Panel system on the rooftops of the Air Cargo Sort Building and the parking garage. In concert with the Final EIR, the proposed Project's Solar PV Panel system has been increased in size from 1.5 Megawatts to 3.8 Megawatts. This design modification results in the Solar PV Panel system occupying all available space on the rooftops of the Air Cargo Sort Building and the parking garage (see **Section 2.0: Additions and Corrections** in this Final EIR). The increase in Solar PV Panels on the rooftops of the Air Cargo Sort Building and the parking garage would not result in an adverse change to the impact analysis in the Draft EIR. Implementation of this refined Project design component will be achieved via enforcement of PDF GHG-2. Please also see **Topical Response 1: Sustainable Project Design Features and Mitigation Measures**, above, for GHG emission reductions associated with the increase in solar PV Panels.

Further, the proposed Project design already includes light-colored roofing and paving materials. The aircraft apron, which represents the majority of the paving, would be concrete, a light-colored paving material. The architectural design has advanced since the preparation of the Draft EIR, and the Solar PV Panel system occupies all available space on the rooftops of the Air Cargo Sort Building and the parking garage. In light of this, MM AQ-6 has been updated as follows and incorporated into the Final EIR (please see Sections 2.0: Additions and Corrections and 4.0: Mitigation Monitoring and Reporting Program, as well as **Table TR-1** in **Topical Response 1: Sustainable Project Design Features and Mitigation Measures**, above):

MM AQ-6: The Applicant shall include, in the design requirements for the Project, cool roof installation to the extent roof space is not occupied by solar panels, in order to reduce energy use and urban heat island effects.

The revision of this mitigation measure would not result in an adverse change to the impact analysis in the Draft EIR. Please also see **Topical Response 1: Sustainable Project Design Features and Mitigation Measures**, above, regarding the light-colored roofing and paving materials.

The proposed Project also includes Energy Star heating, cooling, and lighting devices, and appliances (e.g., Heating, Ventilation, and Air Conditioning (HVAC) units in the form of energy efficient commercial heat pumps). The definition and design of the interior features of the Air

Cargo Sort Building have advanced since preparation of the Draft EIR and it has been confirmed Energy Star appliances would be used. This mitigation measure, MM AQ-8, is incorporated into the Final EIR (please see **Section 2.0: Additions and Corrections** and **Section 4.0: Mitigation Monitoring and Reporting Program** in this Final EIR, as well as **Table TR-1** in **Topical Response 1: Sustainable Project Design Features and Mitigation Measures**, above). The inclusion of this mitigation measure would not result in an adverse change to the impact analysis in the Draft EIR.

Finally, as discussed on pages 5.2-67 and 5.2-68 of the Draft EIR, the proposed Project would comply with Rule 1113 for controlling VOC emissions from architectural coatings. Low-VOC architectural coatings that go beyond the requirements of South Coast AQMD Rule 1113 are limited in availability for application types needed for the proposed Project. Compliance with this regulatory compliance measure would not result in an adverse change to the impact analysis in the Draft EIR. Rule 113 addresses solvent cleaning that is conducted as part of a business including solvent cleaning of architectural coating application equipment (i.e., paint sprayers etc.). The portion of the comment that states "Use of water-based or low-VOC cleaning products that go beyond the requirements of South Coast AQMD Rule 1113" is not applicable as regular use of solvents for cleaning equipment, thinning paints, etc. would not be part of the proposed Project.

Comment C-6:

Design considerations for the Proposed Project that the Lead Agency should consider including in the Final EIR to further reduce air quality and health risk impacts include the following:

- 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.)
- 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
- Design the Proposed Project such that any check-in point for trucks is inside the Proposed Project site to ensure that no trucks are queuing outside
- Design the Proposed Project to ensure that truck traffic inside the Proposed Project site is as far away as feasible from sensitive receptors
- Restrict overnight truck parking in sensitive land uses by providing overnight truck parking inside the Proposed Project site

Response C-6:

The five SCAQMD-recommended design considerations to further reduce air quality and health risk impacts in this comment were analyzed for applicability and feasibility.

The primary truck routes for the proposed Project are already designated truck routes by the City of Ontario. As such, additional marking of the routes with trailblazing signs is unnecessary. As shown in Figure 4 of the *Traffic Study* (Appendix 5.12 of the Draft EIR), the majority of truck trips generated by the proposed Project will use Mission Boulevard, North Euclid Avenue, Grove Avenue, South Vineyard Avenue, South Archibald Avenue, Jurupa Street, and South Haven Avenue to access the nearby freeways. As noted, the City of Ontario has already designated these truck routes and the addition of trailblazer signs along these City of Ontario-designated truck routes is not warranted for this reason.

As currently designed with three access driveways on East Avion Street (Draft EIR, page 5.12-67), no trucks would queue outside of the Project site. Additionally, the proposed Project is already designed so that truck entrances and exits do not face sensitive receptors. Further, trucks will not pass sensitive receptors as they enter and exit the Project site. Land uses surrounding the Airport, including the Project site, are primarily industrial/commercial. Distances from the Airport boundary to residentially-zoned areas are approximately 1,200 feet (0.23 miles) to the northwest, 1,300 feet (0.25 miles) to the southwest, 2,800 feet (0.53 miles) to the north, 3,600 feet (0.68 miles) to the west, and 6,500 feet (1.2 miles) to the south. However, there also are some residences located within the industrial/commercial areas to the west and south. The closest existing sensitive receptor to the Project site is a single-family residence on South Grove Avenue, approximately 200 feet north of the Airport boundary (approximately 2,000 feet northwest of Runway 8L – 26R). The closest school is the Mariposa Elementary School, approximately 2,000 feet (0.38 miles) north of the Airport boundary. The closest hospital is the Kaiser Permanente Ontario Vineyard hospital, approximately 5,300 feet (one mile) south of the Airport boundary.[5]

Notably, the trucking-related activities associated with the proposed Project are located well within the Airport boundary and are generally located within the southern portion of the Airport (Runway 8R – 26L and south); therefore, the distances between the Project's on-Airport trucking activities and the receptors are further than noted. Given the location of the entrances and exits on the Project site, trucks would not pass by sensitive receptors. Because the proposed Project is already designed to comply with SCAQMD's recommendation, no further action is warranted.

The proposed Project operations also result in compliance with SCAQMD's suggestion that any overnight truck parking occur onsite. The proposed Project would operate 24 hours a day, seven

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5 OIAA. *Ontario International Airport South Airport Cargo Center Project Draft Environmental Impact Report*. SCH Number 2021100226. Page 5.2-23. https://www.flyontario.com/our-neighbors/environment. Accessed May 2023.

days a week. Because of the continual operations, there would be no truck parking within the site. The site also does not have any overnight truck parking in sensitive land use areas. Storage and maintenance of trucks would also occur on site and, in the event that overnight truck parking is ever necessary, the trucks would be parked within the Project site. Nonetheless, PDF AQ-11, restricting any overnight parking of trucks to locations within the Project site has been incorporated into the Final EIR (please see **Section 2.0: Additions and Corrections** and **Section 4.0: Mitigation Monitoring and Reporting Program** in this Final EIR, as well as **Table TR-1** in **Topical Response 1: Sustainable Project Design Features and Mitigation Measures**, above). The inclusion of this PDF would not result in an adverse change to the impact analysis in the Draft EIR.

Comment C-7:

South Coast AQMD staff also suggests the Lead Agency review the below references and consider including any feasible additional recommended mitigation measures in the Final EIR:

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

Response C-7:

SCAQMD referenced six (6) documents to review and consider for purposes of identifying any feasible additional recommended mitigation measures for the Final EIR. SCAQMD's referenced documents were reviewed and considered for inclusion in the Final EIR based on their applicability and feasibility, as described below. **Table C-3: SCAQMD Reference Documents Measures** identifies each suggested measure and provides the necessary evaluation.

As an initial point, it should be noted that the proposed Project already includes a majority of suggested measures. Two project design features included in the Draft EIR, PDF AQ-1 and PDF GHG-2, and two mitigation measures, MM AQ-5 and MM AQ-6, have been revised. Three new project design features and nine additional mitigation measures have been added in the Final EIR pertaining to the Project's air quality and GHG emissions (please see **Section 2.0: Additions and Corrections** in this Final EIR, as well as **Table TR-1** in **Topical Response 1: Sustainable**

Project Design Features and Mitigation Measures, above). It is important to note air quality and GHG impacts related to construction would be less than significant. As such, while considered for application, additional construction-related measures are not strictly required by CEQA.

TABLE C-3 SCAQMD REFERENCE DOCUMENTS MEASURES	
Measure	**Applicability/Feasibility to the proposed Project**
State of California – Department of Justice: Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act[1]	
Construction Mitigation Measures	
Requiring off-road construction equipment to be zero-emission, *where available,* and all diesel-fueled off-road construction equipment, to be equipped with CARB Tier IV-compliant engines or better, and including this requirement in applicable bid documents, purchase orders, and contracts, with successful contractors demonstrating the ability to supply the compliant construction equipment for use prior to any ground-disturbing and construction activities.	This measure is already included as PDF AQ-1. The language of PDF AQ-1 is revised in the Final EIR to more closely match this proposed measure. PDF AQ-1 has been revised in the Final EIR as follows: PDF AQ-1: For all phases of construction activity, the Applicant shall require use of off road-construction equipment that is zero emission, if and to the extent available, or diesel-fueled off-road construction equipment that meets the USEPA's Tier 4 emissions standards for offroad diesel-powered construction equipment with 50 horsepower (hp) or greater. To ensure that Tier 4 or the cleanest construction equipment available would be used during the Project's construction, the OIAA shall confirm that the Applicant includes this requirement in applicable bid documents, purchase orders, and contracts. Additionally, the OIAA shall confirm that the Applicant also requires periodic reporting and provision of written construction documents by construction contractor(s) and conducts regular inspections to the maximum extent feasible to ensure and enforce compliance. Please see **Section 2.0: Additions and Corrections** in this Final EIR, as well as **Table TR-1** in **Topical Response 1: Sustainable Project Design Features and Mitigation Measures**, above.

TABLE C-3 SCAQMD REFERENCE DOCUMENTS MEASURES	
Measure	**Applicability/Feasibility to the proposed Project**
Requiring on-road heavy-duty haul trucks to be model year 2010 or newer if diesel-fueled.	This measure is already included in Draft EIR as MM AQ-1. See **Response to Comment C-4**, above.
Providing electrical hook ups to the power grid, rather than use of diesel-fueled generators, for electric construction tools, such as saws, drills and compressors, and using electric tools whenever feasible.	As provided in the Draft EIR, MM AQ-2 requires that construction equipment, such as concrete/industrial saws, pumps, aerial lifts, light stands, air compressors, and forklifts, be electric or alternative-fueled (i.e., non-diesel), where feasible. Pole power shall be utilized at the earliest feasible point in time and shall be used to the maximum extent feasible in lieu of generators.
Limiting the amount of daily grading disturbance area.	This measure relates to dust emissions during grading. The proposed Project is only grading the minimum area necessary to complete the construction of the facility to raise the site to match the elevation of the northern portion of the site, requiring mostly fill and compaction of fill material. No large scale surface grading would be required for the proposed Project.
Prohibiting grading on days with an Air Quality Index forecast of greater than 100 for particulates or ozone for the project area.	Given the proposed Project schedule described in Section 3.0 of the Draft EIR, the proposed Project Applicant and OIAA cannot commit to prohibiting grading on days with an Air Quality Index forecast of greater than 100 for particulates or ozone for the proposed Project area. At this point in time, the SCAQMD has not established rules or requirements to prohibit construction activities on days with an AQI index of greater than 100. However, the proposed Project will comply with any air quality advisories issued by SCAQMD due to air quality warnings during the duration of the Project's construction period. Additionally, the Project would implement numerous controls identified in the Draft EIR to minimize exhaust and fugitive emissions

TABLE C-3 SCAQMD REFERENCE DOCUMENTS MEASURES	
Measure	**Applicability/Feasibility to the proposed Project**
	during the grading phase. The current approach, as analyzed in the Draft EIR, would address health concerns and, for this reason, no action is warranted.
Forbidding idling of heavy equipment for more than two minutes	The Draft EIR (page 5.2-44) states the Applicant shall require construction contractors to implement the following regulatory compliance measures during construction to reduce exhaust emissions: – Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations). It is not practical to limit idling times beyond the five minutes required by the California Airborne Toxics Control Measure contained in Title 13, Section 2485 of California Code of Regulations as it may cause more emissions from delivery trucks to turn on and off engines more frequently than five minutes. For this reason, this measure is not feasible. Mitigation measure MM AQ-16 has been added, which requires, during construction, interior- and exterior-facing signs shall be posted to inform construction contractors to shut off truck and equipment engines when not in use (please see **Section 2.0: Additions and Corrections** in this Final EIR, as well as **Table TR-1** in **Topical Response 1: Sustainable Project Design Features and Mitigation Measures**, above).
Keeping onsite and furnishing to the lead agency or other regulators upon request, all equipment maintenance records	The Draft EIR (page 5.2-44) states documentation demonstrating proper maintenance, in accordance with the manufacturer's specifications for all construction equipment, shall be maintained on site and tampering with

TABLE C-3
SCAQMD REFERENCE DOCUMENTS MEASURES

Measure	Applicability/Feasibility to the proposed Project
and data sheets, including design specifications and emission control tier classifications.	construction equipment to increase horsepower or to defeat emission control devices must be prohibited. As this documentation would already be maintained on site, this regulatory compliance measure is already included in the Draft EIR.
Conducting an on-site inspection to verify compliance with construction mitigation and to identify other opportunities to further reduce construction impacts.	PDF AQ-1 states OIAA shall confirm that the Applicant requires periodic reporting and provision of written construction documents by construction contractor(s) and conducts regular inspections to the maximum extent feasible to ensure and enforce compliance. Therefore, no modifications to the Final EIR are necessary.
Using paints, architectural coatings, and industrial maintenance coatings that have volatile organic compound levels of less than 10 g/L.	See **Response to Comment C-5**, above.
Providing information on transit and ridesharing programs and services to construction employees.	Draft EIR MM AQ-3 already requires the Applicant to support and encourage ridesharing and transit incentives for construction crew by providing crews with the resources needed to organize rideshares. Such resources could include, bulletin boards or email announcements; partially subsidize transit fares or passes for the construction crew members who can feasibly use transit; and setting a goal to achieve ten percent total construction worker participation in ridesharing programs and transit use. Thus, MM AQ-3 in the Draft EIR addressed this suggestion and no further action is necessary. recommendation.
Providing meal options onsite or shuttles between the facility and nearby meal destinations for construction employees.	Consistent with the intent of this measure, the Applicant would provide on-site food trucks during construction. An additional mitigation measure, MM

TABLE C-3
SCAQMD REFERENCE DOCUMENTS MEASURES

Measure	Applicability/Feasibility to the proposed Project
	AQ-10, requiring on-site food trucks during construction for construction employees has been added to the Final EIR (please see **Section 2.0: Additions and Corrections**, as well as **Table TR-1** in **Topical Response 1: Sustainable Project Design Features and Mitigation Measures**, above).
Operational Mitigation Measures	
Requiring that all facility-owned and operated fleet equipment with a gross vehicle weight rating greater than 14,000 pounds accessing the site meet or exceed 2010 model-year emissions equivalent engine standards as currently defined in California Code of Regulations Title 13, Division 3, Chapter 1, Article 4.5, Section 2025. Facility operators shall maintain records on-site demonstrating compliance with this requirement and shall make records available for inspection by the local jurisdiction, air district, and state upon request.	The proposed Project would implement MM AQ-5, below (which has been revised in **Section 2.0: Additions and Corrections** in this Final EIR and in **Topical Response 1: Sustainable Project Design Features and Mitigation Measures**). MM AQ-5: The Applicant shall require, if and to the extent feasible, the use of zero-emission or near zero emission on-road heavy duty trucks as part of business operations beginning in 2025 (within at least 25 percent of the Project fleet). The Applicant also shall require, if and to the extent feasible, the use of zero-emission or near zero emission on-road heavy duty trucks as part of the business operations beginning in 2029 (within at least 50 percent of the Project fleet). Additionally MM AQ-15, has been added to meet CARB's 2010 engine emissions standards to further reduce operational mobile emissions (please see **Section 2.0: Additions and Corrections** in this Final EIR and in **Topical Response 1: Sustainable Project Design Features and Mitigation Measures**).

TABLE C-3 SCAQMD REFERENCE DOCUMENTS MEASURES	
Measure	**Applicability/Feasibility to the proposed Project**
	MM AQ-15: The Applicant shall include a provision in all operational freight hauling contracts requiring the use of 2010 model year trucks that meet CARB's 2010 engine emission standards, or newer and cleaner trucks, if and to the extent feasible. Thus, MM AQ-5 addressed and requires this recommendation.
Requiring all heavy-duty vehicles entering or operated on the project site to be zero-emission beginning in 2030.	The requirement for all heavy-duty vehicles entering or operated on the Project site to be zero emission beginning in 2030 is not feasible given current technology and availability as discussed in **Topical Response 1: Sustainable Project Design Features and Mitigation Measures**, above. See **Response to Comment C-4**, above.
Requiring on-site equipment, such as forklifts and yard trucks, to be electric with the necessary electrical charging stations provided.	MM AQ-4 states the Applicant shall require, in addition to the GSE, all other on-site cargo-handling equipment and similar equipment to be electric with the necessary electrical charging stations provided. Thus, MM AQ-4 in the Draft EIR addressed this measure. See **Topical Response 1: Sustainable Project Design Features and Mitigation Measures**, above, for further information on electric equipment and electrical charging stations.
Requiring tenants to use zero-emission light- and medium-duty vehicles as part of business operations.	This is not a "last mile" facility. Therefore, light and medium-duty vehicles would not be utilized for purposes of transporting the proposed Project's cargo.
Forbidding trucks from idling for more than two minutes and requiring operators to turn off engines when not in use.	An additional mitigation measure, MM AQ-10, has been added to the Final EIR, which would require interior- and exterior-facing signs, including signs directed toward all dock and delivery areas, to be posted that identify contact information to report violations to CARB, the air district, and the building

TABLE C-3 SCAQMD REFERENCE DOCUMENTS MEASURES	
Measure	**Applicability/Feasibility to the proposed Project**
	manager. These signs will also inform truck drivers to shut off their engines when not in use (see **Section 2.0: Additions and Corrections** in this Final EIR, as well as **Table TR-1** in **Topical Response 1: Sustainable Project Design Features and Mitigation Measures**, above).
Posting both interior- and exterior-facing signs, including signs directed at all dock and delivery areas, identifying idling restrictions and contact information to report violations to CARB, the air district, and the building manager.	This measure is applicable to and feasible for the proposed Project. An additional mitigation measure, MM AQ-10, has been added in the Final EIR to require posting both interior- and exterior-facing signs, including signs directed at all dock and delivery areas, that identify idling restrictions and contact information to report violations. These signs will also inform truck drivers to shut off their engines when not in use. Please see **Section 2.0: Additions and Corrections** in this Final EIR, as well as **Table TR-1** in **Topical Response 1: Sustainable Project Design Features and Mitigation Measures**, above.
Installing and maintaining, at the manufacturer's recommended maintenance intervals, air filtration systems at sensitive receptors within a certain radius of facility for the life of the project.	See **Response to Comment C-6** for distances to nearest sensitive receptors. At this distance, the proposed Project would not result in significant impacts to nearby sensitive receptors. Additionally, a Health Risk Assessment (HRA) was conducted for the proposed Project to address the potential for human health impacts associated with the proposed Project. The Draft EIR concluded health risk impacts from construction and operation of the proposed Project would be less than significant. For this reason, this measure is not applicable or necessary
Constructing electric truck charging stations proportional to the number of dock doors at the project.	The Draft EIR states (on page 5.2-61) electric charging stations would be provided in the truckyard. See **Topical Response 1: Sustainable Project Design Features and Mitigation Measures** and **Response to Comment C-**

TABLE C-3 SCAQMD REFERENCE DOCUMENTS MEASURES	
Measure	**Applicability/Feasibility to the proposed Project**
	4, above, for new PDF AQ-10 and additional information on electric truck charging stations.
Constructing electric plugs for electric transport refrigeration units at every dock door, if the warehouse use could include refrigeration.	The Project includes a cooler for temperature sensitive freight, which would mostly be transported via aircraft. Some temperature sensitive cargo may be transported by truck. A mitigation measure, MM AQ-11, has been added to the Final EIR that requires installation of electric plug-ins for electric transport refrigeration units. Please see **Section 2.0: Additions and Corrections** in this Final EIR, as well as **Table TR-1** in **Topical Response 1: Sustainable Project Design Features and Mitigation Measures**, above.
Constructing electric light-duty vehicle charging stations proportional to the number of parking spaces at the project.	The Draft EIR states (on page 5.2-61) electric charging stations would be provided in the employee and visitor parking lots. This design commitment is more specifically delineated in PDF AQ-8, which is set forth on page 5.2-65 of the Draft EIR. See also **Topical Response 1: Sustainable Project Design Features and Mitigation Measures** above for additional information.
Installing solar photovoltaic systems on the project site of a specified electrical generation capacity, such as equal to the building's projected energy needs.	As discussed on page 3.0-29 of the Draft EIR, the proposed Project originally was designed to include a 1.5 Megawatt Solar PV Panel system on the rooftops of the Air Cargo Sort Building and the parking garage. In the Final EIR, the Solar PV Panel system size was increased from 1.5 Megawatts to 3.8 Megawatts, which would occupy all available space on the rooftops of the Air Cargo Sort Building and the parking garage (see **Section 2.0: Additions and Corrections** in this Final EIR). While there has been a substantial increase in the sizing of the on-site Solar PV Panel system, this system would not fully meet the estimated energy need for the proposed Project, which would require a total electrical demand of 12.4 MW at buildout. A new substation is

TABLE C-3 SCAQMD REFERENCE DOCUMENTS MEASURES	
Measure	**Applicability/Feasibility to the proposed Project**
	being planned by SCE to meet the need for additional power for the proposed Project. See **Topical Response 1: Sustainable Project Design Features and Mitigation Measures** and **Response to Comment C-5**, above, for additional information on Solar PV panels.
Requiring all stand-by emergency generators to be powered by a non-diesel fuel.	As discussed on Page 5.2-61 of the Draft EIR, the proposed Project includes seven 2.0- MW diesel-engine driven emergency generators; five generators during Phase 1 and an additional two generators within Phase 2. This measure is not feasible for the Project due to the size of the emergency generators required, as non-diesel generators of the size required are not readily available at this time.
Requiring facility operators to train managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.	A mitigation measure, MM AQ-12, has been added to the Final EIR that requires facility operators to train managers and employees on efficient scheduling and load management to eliminate unnecessary queuing. An additional mitigation measure, MM AQ-10, has been added to the Final EIR, which would require interior- and exterior-facing signs, including signs directed toward all dock and delivery areas, to be posted that identify contact information to report idling violations to CARB, the air district, and the building manager. These signs will also inform truck drivers to shut off their engines when not in use. Please see **Section 2.0: Additions and Corrections** in this Final EIR, as well as **Table TR-1** in **Topical Response 1: Sustainable Project Design Features and Mitigation Measures**, above.
Requiring operators to establish and promote a rideshare program that discourages single-occupancy vehicle trips and	MM TRANS-1 through MM TRANS-5 require the Applicant to establish and promote a rideshare program. Thus, this measure is already included in the Draft EIR.

TABLE C-3 SCAQMD REFERENCE DOCUMENTS MEASURES	
Measure	**Applicability/Feasibility to the proposed Project**
provides financial incentives for alternate modes of transportation, including carpooling, public transit, and biking.	
Meeting CalGreen Tier 2 green building standards, including all provisions related to designated parking for clean air vehicles, electric vehicle charging, and bicycle parking.	The Air Cargo Sort Building has been designed as a carbon neutral building that will meet or exceed the Tier 2 green building standards. Please see **Topical Response 1: Sustainable Project Design Features and Mitigation Measures** for discussion of the features of the proposed Project that will reduce emissions.
Achieving certification of compliance with LEED green building standards.	This measure is applicable to and feasible for the proposed Project and was discussed in the Draft EIR. Per PDF AQ-7, the Air Cargo Sort Building will meet Leadership in Energy and Environmental Design (LEED) certification standards. See **Topical Response 1: Sustainable Project Design Features and Mitigation Measures** and **Response to Comment C-5**, above, for additional information on LEED green building standards.
Providing meal options onsite or shuttles between the facility and nearby meal destinations.	The proposed Project includes a full commercial kitchen and café across all shifts.
Posting signs at every truck exit driveway providing directional information to the truck route.	This measure is applicable to and feasible for the Project. A mitigation measure, MM AQ-13, has been added to the Final EIR that requires posting of signs at every truck exit driveway providing directional information to the truck route. Please see **Section 2.0: Additions and Corrections** in this Final EIR, as well as **Table TR-1** in **Topical Response 1: Sustainable Project Design Features and Mitigation Measures**, above.
Improving and maintaining vegetation and tree canopy for residents in and around the project area	This measure is not applicable to the Project. See **Response to Comment C-6** for distances to nearest sensitive receptors.

TABLE C-3 SCAQMD REFERENCE DOCUMENTS MEASURES	
Measure	**Applicability/Feasibility to the proposed Project**
Requiring that every tenant train its staff in charge of keeping vehicle records in diesel technologies and compliance with CARB regulations, by attending CARB-approved courses. Also require facility operators to maintain records on-site demonstrating compliance and make records available for inspection by the local jurisdiction, air district, and state upon request.	This measure is applicable to and feasible for the Project's Applicant-owned fleet. A mitigation measure, MM AQ-14, has been added to the Final EIR that requires the Applicant to train its staff in charge of keeping vehicle records in diesel technologies and compliance with CARB regulations, by attending CARB-approved courses and maintain records on-site demonstrating compliance and make records available for inspection by the local jurisdiction, air district, and state upon request. Please see **Section 2.0: Additions and Corrections** in this Final EIR, as well as **Table TR-1** in **Topical Response 1: Sustainable Project Design Features and Mitigation Measures**, above.
Requiring tenants to enroll in the United States Environmental Protection Agency's SmartWay program, and requiring tenants to use carriers that are SmartWay carriers.	The Applicant is a registered SmartWay carrier.
Providing tenants with information on incentive programs, such as the Carl Moyer Program and Voucher Incentive Program, to upgrade their fleets.	This measure is not applicable as the Project would not have tenants.
South Coast AQMD 2022 South Coast Air Quality Management Plan, Appendix IV-A – South Coast AQMD's Stationary and Mobile Source Control Measures[2]	
Commercial Combustion Source Measures (Stationary Source)	
C-CMB-01 Emission Reductions from Replacement with Zero Emission or Low NOx Appliances – Commercial Water Heating [NOx]	As discussed on page 3.0-29 of the Draft EIR, the proposed Project has been designed to eliminate the consumption of natural gas (see PDF GHG-1 [all-electric Air Cargo Sort Building]). The proposed Project would utilize electric commercial hot water heaters. For this reason, PDF GHG-1 is as effective as this recommended measure.

TABLE C-3 SCAQMD REFERENCE DOCUMENTS MEASURES	
Measure	**Applicability/Feasibility to the proposed Project**
C-CMB-02 Emission Reductions from Replacement with Zero Emission or Low NOx Appliances – Commercial Space Heating [NOx]	No space heaters would be utilized as part of the proposed Project. For this reason, this measure is not applicable.
C-CMB-03 Emission Reductions from Commercial Cooking Devices [NOx]	The proposed Project would include a full kitchen and café that would be all electric. As discussed on page 3.0-29 of the Draft EIR, the proposed Project has been designed to eliminate the consumption of natural gas (see PDF GHG-1 [all-electric Air Cargo Sort Building]). For this reason, PDF GHG-1 is as effective as this recommended measure.
C-CMB-04 Emission Reductions from Small Internal Combustion Engines [NOx]	No small internal combustion engines would be utilized as part of the proposed Project. For this reason, this measure is not applicable.
C-CMB-05 NOx Reductions from Small Miscellaneous Commercial Combustion Equipment (Non-Permitted) [NOx]	This program is for replacing existing equipment. The proposed Project would replace existing, underutilized airport-related buildings and site improvements with an air cargo center. For this reason, this measure is not applicable.
Large Combustion Source Measures (Stationary Source)	
L-CMB-01 NOx Reductions from RECLAIM Facilities [NOx]	This measure is not applicable as the Project is not a RECLAIM facility.
L-CMB-02 Reductions from Boilers and Process Heaters (Permitted) [NOx]	As discussed on Page 3.0-29 of the Draft EIR, the Project has been designed to eliminate the consumption of natural gas (see PDF GHG-1 [all-electric Air Cargo Sort Building]). The proposed Project would utilize heat pumps. For this reason, PDF GHG-1 is as effective as this recommended measure. See **Topical Response 1: Sustainable Project Design Features and Mitigation Measures**, above.

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SCAQMD REFERENCE DOCUMENTS MEASURES

Measure	Applicability/Feasibility to the proposed Project
L-CMB-03 NOx Emission Reductions from Permitted Non-Emergency Internal Combustion Engines [NOx]	This measure is not applicable as the proposed Project would not have any Permitted Non-Emergency Internal Combustion Engines.
L-CMB-04 Emission Reductions from Emergency Standby Engines (Permitted) [NOx, VOCs]	The proposed Project would be fully backed up by Standby Generators that would be diesel powered. See **Topical Response 1: Sustainable Project Design Features and Mitigation Measures**, above.
L-CMB-05 NOx Emission Reductions from Large Turbines [NOx	This measure is not applicable as no large turbines are proposed as part of the proposed Project.
L-CMB-06 NOx Emission Reductions from Electricity Generating Facilities [NOx]	This measure is not applicable as the proposed Project would not be an Electricity Generating Facility.
L-CMB-07 Emission Reductions from Petroleum Refineries [NOx]	This measure is not applicable as the proposed Project would not be a petroleum refinery.
L-CMB-08 NOx Emission Reductions from Combustion Equipment at Landfills and Publicly Owned Treatment Works [NOx]	This measure is not applicable as the proposed Project would not be a landfill or publicly owned treatment work.
L-CMB-09 NOx Reductions from Incinerators [NOx]	This measure is not applicable as no incinerators are proposed as part of the proposed Project.
L-CMB-10 NOx Reductions from Miscellaneous Permitted Equipment [NOx]	This measure is not applicable as no miscellaneous permitted equipment are proposed as part of the proposed Project.

TABLE C-3 SCAQMD REFERENCE DOCUMENTS MEASURES	
Measure	**Applicability/Feasibility to the proposed Project**
South Coast AQMD Co-Benefits from Energy and Climate Change Programs Measures (Stationary Source)	
ECC-01 Co-Benefits from Existing and Future Greenhouse Gas Programs, Policies, and Incentives [NOx]	This is a general program that would not specifically apply to the Project. The Project incorporates PDFs GHG-1 and GHG-2, Mitigation Measures MM AQ-1 through AQ-7, and Mitigation Measures MM TRANS-1 through TRANS-5 to reduce GHG emissions to the maximum extent feasible. See **Topical Response 1: Sustainable Project Design Features and Mitigation Measures**, above.
ECC-02 Co-Benefits from Existing and Future Residential and Commercial Building Energy Efficiency Measures [NOx, VOCs]	This program is for existing buildings. The Project would replace existing, underutilized airport-related buildings and site improvements with an air cargo center. For this reason, this measure is not applicable.
ECC-03 Additional Enhancements in Reducing Existing Residential Building Energy Use [NOx, VOCs]	This measure is not applicable as there are no existing residential buildings on the Project site.
South Coast AQMD Stationary Source VOC Measures (Stationary Source)	
FUG-01 Improved Leak Detection and Repair [VOCs]	This measure is not applicable as the Project would not include any process or storage equipment subject to leak detection requirements.
FUG-02 Emission Reductions from Industrial Cooling Towers [VOCs]	This measure is not applicable as the proposed Project would not include an Industrial Cooling Tower.
CTS-01 Further Emission Reductions from Coatings, Solvents, Adhesives, and Lubricants [VOCs]	This measure is not applicable as the proposed Project is not a manufacturing facility using these products.
FLX-02 Stationary Source VOC Incentives [VOCs]	This measure is not applicable as the proposed Project is not an existing business or manufacturing facility that would benefit from this program.

TABLE C-3 SCAQMD REFERENCE DOCUMENTS MEASURES	
Measure	**Applicability/Feasibility to the proposed Project**
BIO-01 Assessing Emissions from Urban Vegetation [VOCs]	This measure is not applicable as the vegetation on the Project site is negligible.
L-CMB-04 Emission Reductions from Emergency Standby Engines (Permitted) [NOx, VOCs]	The proposed Project would be fully backed up by Standby Generators that would be diesel powered. As discussed on Page 5.2-61 of the Draft EIR, the proposed Project includes seven 2.0- MW diesel-engine driven emergency generators; five generators during Phase 1 and an additional two generators within Phase 2.
South Coast AQMD Stationary Source Other Measures (Stationary Source)	
MCS-01 Application of All Feasible Measures [All Pollutants]	With incorporation of mitigation measures from the Draft EIR and any that are added in **Section 2.0: Additions and Correction** in this Final EIR, all feasible mitigation measures would be applied.
MCS-02 Wildfire Prevention [NOx, PM]	This measure is not applicable as the Project site is not located in or near a wildfire hazard area.
FLX-01 Improved Education and Public Outreach [All Pollutants]	This measure is not applicable as this is an education program for consumers.
Emission Growth Management Measures (Mobile Source)	
EGM-01 Emission Reductions from New Development and Redevelopment [All Pollutants]	This measure is not applicable as this is a program to identify additional future control measures for indirect sources.
EGM-02 Emission Reductions from Projects Subject to General Conformity Requirements [All Pollutants]	Environmental review of the Project, including General Conformity, will be conducted as required to comply with NEPA by the FAA.
EGM-03 Emission Reductions from Clean Construction Policy [All Pollutants]	This measure is not applicable as this is a program to develop a Clean Construction Policy (CCP)

TABLE C-3 SCAQMD REFERENCE DOCUMENTS MEASURES	
Measure	**Applicability/Feasibility to the proposed Project**
Facility -Based Mobile Source Measures (Mobile Source)	
MOB-01 Emission Reductions at Commercial Marine Ports [NOx, SOx, PM]	This measure is not applicable as the Project is not located at a commercial marine port.
MOB-02A Emission Reductions at New Rail Yards and Intermodal Facilities [NOx, PM]	This measure is not applicable as the Project would not be a New Rail Yard and Intermodal Facility.
MOB-02B Emission Reductions at Existing Rail Yards and Intermodal Facilities [NOx, PM]	This measure is not applicable as the Project would not be an Existing Rail Yard and Intermodal Facility.
MOB-03 Emission Reductions at Warehouse Distribution Centers [NOx]	The Project would comply to MOB-03 as applicable.
MOB-04 Emission Reductions at Commercial Airports [All Pollutants]	This measure as it applies to the Airport is discussed in Draft EIR. OIAA has an MOU to address GSE at the Airport. The proposed Project would have all electric GSE and would be consistent with this MOU. See PDF AQ-3 and **Topical Response 1: Sustainable Project Design Features and Mitigation Measures**, above.
On-Road and Off-Road Mobile Source Measures (Mobile Source)	
MOB-05 Accelerated Retirement of Older Light-Duty and Medium-Duty Vehicles [VOCs, NOx, CO]	This measure is not applicable to individual projects as it involves developing and implementing a strategy to retire existing older vehicles from fleets.
MOB-06 Accelerated Retirement of Older On-Road Heavy-Duty Vehicles [NOx, PM]	This measure is not applicable to individual projects as it involves developing and implementing a strategy to retire existing heavy-duty vehicles from fleets. Please see **Topical Response 1: Sustainable Project Design Features and**

TABLE C-3 SCAQMD REFERENCE DOCUMENTS MEASURES	
Measure	**Applicability/Feasibility to the proposed Project**
	Mitigation Measures, above, for additional information regarding sustainability of the heavy-duty vehicles.
MOB-07 On-Road Mobile Source Emission Reduction Credit Generating Program [NOx, PM]	This measure is not applicable to individual projects as it involves developing and implementing mechanisms at a program wide level to encourage early deployment of zero and low NOx emission heavy-duty trucks.
MOB-08 Small Off-Road Engine Equipment Exchange Program [VOCs, NOx, PM]	This is not applicable to the Project as it is a program for small engines used in landscape maintenance equipment.
MOB-09 Further Emission Reductions from Passenger Locomotives [NOx, PM]	This measure is for Passenger Locomotives and is not applicable to the Project.
MOB-10 Off-Road Mobile Source Emission Reduction Credit Generation Program [NOx, PM]	This measure is not applicable to individual projects as this it involves developing mobile source emission reduction credits (MSERCs) program.
Incentive-Based Measures (Mobile Source)	
MOB-11 Emission Reductions from Incentive Programs [NOx, PM]	This measure is applicable to and feasible for the Project. MM TRANS-1 through TRANS-5 require the Applicant to establish and promote a rideshare program. Thus, MM TRANS-1 through TRANS-5 in the Draft EIR already addressed this measure.
MOB-12 Pacific Rim Initiative for Maritime Emission Reductions	This is not applicable to the Project as this is not a maritime project.
Other Measures (Mobile Source)	
MOB-13 Fugitive VOC Emissions from Tanker Vessels [VOCs]	This is not applicable to the Project as no tanker vessels are proposed.

TABLE C-3 SCAQMD REFERENCE DOCUMENTS MEASURES	
Measure	**Applicability/Feasibility to the proposed Project**
MOB-14 Rule 2202 – On-Road Motor Vehicle Mitigation Options [VOCs, NOx, CO]	This measure is applicable to and feasible for the Project. MM TRANS-1 through TRANS-5 reduce employee commute trips. Thus, MM TRANS-1 through TRANS-5 in the Draft EIR already addressed tis measure.
MOB-15 Zero Emission Infrastructure for Mobile Sources [All Pollutants]	This measure is not applicable to individual projects as it involves developing a work program at a regional level to support and accelerate the deployment of zero emission infrastructure needed for the widespread adoption of zero emission vehicles and equipment
South Coast AQMD 2022 South Coast Air Quality Management Plan, Appendix IV-B – CARB's Strategy for South Coast (State SIP Proposed Measures)[3]	
On-Road Heavy-Duty	
Advanced Clean Fleets Regulation	This measure is not applicable to individual projects as this measure involves CARB developing measures to accelerate ZEV adoption in the medium- and heavy-duty sectors by setting zero-emission requirements for fleets. The Project will meet all applicable standards as they are adopted. See **Topical Response 1: Sustainable Project Design Features and Mitigation Measures**, above.
Zero-Emissions Trucks Measure	This measure is not applicable to individual projects as it involves modification of existing measures. The proposed Project will meet all applicable standards as they are adopted. See **Topical Response 1: Sustainable Project Design Features and Mitigation Measures**, above.
On-Road Light-Duty	
On-Road Motorcycle New Emissions Standards	This measure is not applicable as it applies to motorcycle engines.

TABLE C-3 SCAQMD REFERENCE DOCUMENTS MEASURES	
Measure	**Applicability/Feasibility to the proposed Project**
Clean Miles Standard	This measure is not applicable as it applies to ride sharing services.
Off-Road Equipment	
Tier 5 Off-Road Vehicles and Equipment	See PDF AQ-1.
Amendments to the In-Use Off-Road Diesel-Fueled Fleets Regulation	This measure is not applicable as it applies to standards for off-road diesel-powered equipment.
Transport Refrigeration Unit Regulation Part 2	This measure is not applicable as it applies to truck refrigeration units.
Commercial Harbor Craft Amendments	This measure is not applicable as the proposed Project would not include the use of harbor crafts.
Cargo Handling Equipment Amendments	As discussed in the Draft EIR, the Project would include all electric GSE. For this reason, what is proposed for the Project is as effective as this measure. See PDF AQ-3 and **Topical Response 1: Sustainable Project Design Features and Mitigation Measures**, above.
Off-Road Zero-Emission Targeted Manufacturer Rule	This measure is not applicable to individual projects as it involves development of rules for cargo handling equipment and similar sources. As discussed in the Draft EIR, the Project would include all electric GSE. See PDF AQ-3 and **Topical Response 1: Sustainable Project Design Features and Mitigation Measures**, above.
Clean Off-Road Fleet Recognition Program	This measure is not applicable to individual projects as it involves development of a methodology to assist government and non-government entities in encouraging fleets to go beyond existing fleet compliance regulations through contract procedures.

TABLE C-3 SCAQMD REFERENCE DOCUMENTS MEASURES	
Measure	**Applicability/Feasibility to the proposed Project**
Spark-Ignition Marine Engine Standards	This measure is not applicable as there are no marine engines associated with the Project.
Other	
Consumer Products Standards	This measure is not applicable as it addresses standards for consumer products.
Zero-Emission Standard for Space and Water Heaters	This measure is not applicable as it addresses 2030 statewide standards for space and water heaters.
Enhanced Regional Emission Analysis in State Implementation Plans	This measure is not applicable as it addresses Regional Emission Analysis in the State Implementation Plan (SIP).
Pesticides: 1,3-Dichloropropene Health Risk Mitigation	This measure is not applicable as it addresses standards for pesticides.
Primarily-Federally and Internationally Regulated Sources – CARB Measures	
In-Use Locomotive Regulation	This measure is not applicable as it addresses regulations of locomotives.
Future Measures for Aviation Emissions reductions	This measure is not applicable to individual projects as it involves CARB continuing to advocate and coordinate with local, district, State, and federal partners to promulgate measures and regulations to achieve reductions in aviation emissions.
Future Measures for Ocean-Going Vessel Emissions reductions	This measure is not applicable as it applies to ocean-going vessels.
Primarily-Federally and Internationally Regulated Sources – Federal Action Needed	
On-Road Heavy-Duty Vehicle Low-NOx Engine Standards	This measure is not applicable as it applies to Federal actions needed. Proposed project operations would meet all applicable standards.

TABLE C-3 SCAQMD REFERENCE DOCUMENTS MEASURES	
Measure	**Applicability/Feasibility to the proposed Project**
On-Road Heavy-Duty Vehicle Zero-Emission Requirements	This measure is not applicable as it applies to Federal actions needed. Proposed project operations would meet all applicable standards.
Off-Road Equipment Tier 5 Standard for Preempted Engines	This measure is not applicable as it applies to Federal actions needed. Proposed project operations would meet all applicable standards.
Off-Road Equipment Zero-Emission Standards Where Feasible	This measure is not applicable as it applies to Federal actions needed. Proposed project operations would meet all applicable standards.
More Stringent Aviation Engine Standards	This measure is not applicable as it applies to Federal actions needed. Proposed project operations would meet all applicable standards.
Cleaner Fuel and Visit Requirements for Aviation	This measure is not applicable as it applies to Federal actions needed. Proposed project operations would meet all applicable standards.
Zero-Emission On-Ground Operation Requirements at Airports	This measure is not applicable as it applies to Federal actions needed. Proposed project operations would meet all applicable standards.
Airport Aviation Emissions Cap	This measure is not applicable as it applies to Federal actions needed. Proposed project operations would meet all applicable standards.
More Stringent National Locomotive Emission Standards	This measure is not applicable as it applies to the locomotives sector.
Zero-Emission Standards for Locomotives	This measure is not applicable as it applies to the locomotives sector.
Address Unlimited Locomotives Remanufacturing	This measure is not applicable as it applies to the locomotives sector.
More Stringent NOx and PM Standards for Ocean-Going Vessels	This measure is not applicable as the proposed Project does not involve the use of ocean-going vessels.

TABLE C-3 SCAQMD REFERENCE DOCUMENTS MEASURES	
Measure	**Applicability/Feasibility to the proposed Project**
Cleaner Fuel and Vessel Requirements for Ocean-Going Vessels	This measure is not applicable as the proposed Project does not involve the use of ocean-going vessels.
South Coast AQMD 2022 South Coast Air Quality Management Plan, Appendix IV-C – SCAG's Regional Transportation Strategy and Control Measures (Transportation Control Measures [TCMs])[4]	
i. Programs for improved use of public transit;	This measure is applicable to and feasible for the proposed Project. MM TRANS-1 through TRANS-5 encourage the use of public transit. Thus, MM TRANS-1 through TRANS-5 in the Draft EIR addressed and requires this.
ii. Restriction of certain roads or lanes to, or construction of such roads or lanes for use by, passenger buses or high occupancy vehicles;	This measure is not applicable as it addresses high-occupancy vehicle lanes.
iii. Employer-based transportation management plans, including incentives;	This measure is applicable to and feasible for the proposed Project. MM TRANS-1 through TRANS-5 encourage the use of public transit. Thus, MM TRANS-1 through TRANS-5 in the Draft EIR addressed this measure.
iv. Trip-reduction ordinances;	This measure is not applicable as it addresses development of trip-reduction ordinances by public agencies. MM TRANS-1 through TRANS-5, however, include trip reduction measures applicable to the proposed Project.
v. Traffic flow improvement programs that achieve emission reductions;	This measure is not applicable as it addresses traffic flow improvement programs to be developed and implemented by public agencies.
vi. Fringe and transportation corridor parking facilities, serving multiple occupancy vehicle programs or transit service;	This measure is not applicable as it addresses development of parking facilities in locations that will support ridesharing and transit use

TABLE C-3
SCAQMD REFERENCE DOCUMENTS MEASURES

Measure	Applicability/Feasibility to the proposed Project
vii. Programs to limit or restrict vehicle use in downtown areas or other areas of emission concentration, particularly during periods of peak use;	This measure is not applicable as the proposed Project is not proposed in a downtown area.
viii. Programs for the provision of all forms of high-occupancy, shared-ride services, such as the pooled use of vans;	This measure is applicable to and feasible for the proposed Project. MM TRANS-1 through TRANS-5 address ridesharing. Thus, MM TRANS-1 through TRANS-5 in the Draft EIR addressed this measure.
ix. Programs to limit portions of road surfaces or certain sections of the metropolitan area to the use of non-motorized vehicles or pedestrian use, both as to time and place;	This measure is not applicable as it addresses management of streets in metro areas to encourage non-motorized vehicle/pedestrian travel.
x. Programs for secure bicycle storage facilities and other facilities, including bicycle lanes, for the convenience and protection of bicyclists, in both public and private areas;	The Project would include bicycle lockers. For this reason, this measure is already included in the proposed Project.
xi. Programs to control extended idling of vehicles;	The Draft EIR (page 5.2-44) states the Applicant shall require construction contractors to implement the following regulatory compliance measure during construction to reduce exhaust emissions: – Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations). For operation, an additional mitigation measure, MM AQ-10, has been added to the Final EIR, which would require interior- and exterior-facing signs, including signs directed toward all dock and delivery areas, to be posted that identify contact information to report idling violations to CARB, the air district,

TABLE C-3 SCAQMD REFERENCE DOCUMENTS MEASURES	
Measure	**Applicability/Feasibility to the proposed Project**
	and the building manager. These signs will also inform truck drivers to shut off their engines when not in use (see **Section 2.0: Additions and Corrections** in this Final EIR, as well as **Table TR-1** in **Topical Response 1: Sustainable Project Design Features and Mitigation Measures**, above).
xii. Programs to reduce motor vehicle emissions, consistent with Title II of the Clean Air Act, which are caused by extreme cold start conditions;	This measure is not applicable as it applies to motor vehicle emissions.
xiii. Employer-sponsored programs to permit flexible work schedules;	As discussed in Section 3.0: Project Description in the Draft EIR, the facility would operate three work shifts for the office, cargo sorting, and apron/ramp operations. The first shift (7:00 am to 3:00 pm) would include 640 employees, the second shift (3:00 pm to 11:00 pm) would include 95 employees, and the third shift (11:00 pm to 7:00 am) would include 580 employees. With operations running throughout the day and in three shifts, the Project would permit flexible work schedules. For this reason, this measure is already included in the Project.
xiv. Programs and ordinances to facilitate non-automobile travel, provision and utilization of mass transit, and to generally reduce the need for single-occupant vehicle travel, as part of transportation planning and development efforts of a locality, including programs and ordinances applicable to new shopping centers, special events, and other centers of vehicle activity;	This measure is applicable to and feasible for the Project. MM TRANS-1 through TRANS-5 address vehicle travel reductions. Thus, MM TRANS-1 through TRANS-5 in the Draft EIR already address this measure.
xv. Programs for new construction and major reconstruction of paths, tracks or areas solely for the use by pedestrian or other	This measure is not applicable as it addresses development of facilities for use by non-motorized vehicles/pedestrians.

TABLE C-3 SCAQMD REFERENCE DOCUMENTS MEASURES	
Measure	**Applicability/Feasibility to the proposed Project**
non-motorized means of transportation, when economically feasible and in the public interest; and	
xvi. Programs to encourage the voluntary removal from use and the marketplace of pre-1980 model year light duty vehicles and pre-1980 model light duty trucks.	This measure is not applicable as it addresses programs to encourage retirement of pre-1980 light duty vehicles/trucks.
EPA Environmental Justice and Transportation[5]	
New Standards for Medium- and Heavy-Duty Trucks (Clean Trucks Plan)	
Setting more stringent nitrogen oxide (NOx) standards for heavy duty trucks beginning in model year (MY) 2027.	This measure is not applicable to individual projects as it addresses development of standards for heavy duty trucks by regulatory agencies at a national level.
Setting more stringent emissions standards for medium-duty commercial vehicles for MY 2027 and later. This category of vehicles includes many "last mile" delivery vehicles which deliver products to people's doorsteps every day across the country, and which are rapidly electrifying. These new standards are being proposed in combination with new multipollutant standards for light-duty vehicles for MY 2027 and beyond.	This measure is not applicable to individual projects as it addresses development of standards for medium-duty commercial vehicles by regulatory agencies. The Project would not be a last mile delivery facility.
Setting "Phase 3" Greenhouse Gas standards for heavy-duty vehicles beginning as soon as MY 2027 that are significantly stronger than the existing Phase 2 Greenhouse Gas standards.	This measure is not applicable to individual projects as it addresses development of standards for heavy duty trucks by regulatory agencies.

TABLE C-3
SCAQMD REFERENCE DOCUMENTS MEASURES

Measure	Applicability/Feasibility to the proposed Project
Emissions from School Buses and Diesel Vehicles	
The Bipartisan Infrastructure Law's Clean School Bus Program , which provides funding to replace existing school buses with low- or zero-emission school buses, allows EPA to prioritize applications that propose to replace buses that serve high need local educational agencies, low-income and rural areas, and Tribal schools.	This measure is not applicable to individual projects as it addresses school bus programs. No school buses would be utilized for the proposed Project.
In addition to the Clean School Bus program, EPA's Diesel Emissions Reduction Act (DERA) Program funds projects that protect human health and improve air quality by reducing harmful emissions from diesel engines. DERA targets older, dirtier diesel vehicles that lack modern emission control systems to be replaced with new diesel, alt-fuel, and zero emissions vehicles, or upgraded with emission control systems and idle reduction technologies.	MM AQ-5 requires, if and to the extent feasible, the use of zero-emission or near zero emission on-road heavy duty trucks as part of business operations beginning in 2025 (within at least 25 percent of the Project fleet) and the use of zero-emission or near zero emission on-road heavy duty trucks as part of the business operations beginning in 2029 (within at least 50 percent of the Project fleet). Additionally, see **Topical Response 1: Sustainable Project Design Features and Mitigation Measures**, above, which discusses features of the proposed Project that will reduce emissions and challenges associated with the electrification of the delivery trucks. MM AQ-5 and the measures outlined in the **Topical Response 1: Sustainable Project Design Features and Mitigation Measures** are the mitigation measures that can be feasibly implemented for the Project.
Mobile Source Emissions at Ports	
Through its Ports Initiative, EPA prioritizes steps to improve air quality in communities close in proximity to ports and other goods movement centers that may experience higher	This measure is not applicable as the Project is not located near a port.

TABLE C-3
SCAQMD REFERENCE DOCUMENTS MEASURES

Measure	Applicability/Feasibility to the proposed Project
concentrations of heavy-duty diesel vehicles, vessels, and equipment.	
The DERA Program prioritizes funding for projects at ports that develop publicly available air pollution emissions inventories and emissions reduction targets, and that engage communities to inform project plans and ensure continued efforts to improve air quality after the completion of DERA projects. DERA funding has supported zero emission port projects, including drayage trucks, cranes and yard tractors, ferry and tugboat replacements, and shore power installations.	This measure is not applicable as the Project is not located near a port.
EPA's Partnerships with State and Local Agencies on Reducing Mobile Source Air Pollution	
EPA provides guidance on control measures that result in emissions reductions that may be applied in Clean Air Act-required state implementation plans (SIPs) and in regional emissions analyses for transportation conformity determinations.	This measure is not applicable to individual projects as it involves emissions reductions applied to SIPs.
EPA updated its transportation conformity guidance for conducting PM hot-spot analyses used for estimating the emissions and air quality impacts of federally supported transportation projects such as new or expanded highways or transit facilities with significant increases in diesel truck or bus traffic.	This measure is not applicable as the Project is not a federally supported transportation project. However, it is noted that MM TRANS-1 through TRANS-5 address vehicle travel reductions.

TABLE C-3
SCAQMD REFERENCE DOCUMENTS MEASURES

Measure	Applicability/Feasibility to the proposed Project
EPA's Partnerships with Federal Agencies on Truck Electrification	
EPA is working closely with the Joint Office of Energy and Transportation on building support for greater application of electric vehicle technologies.	This measure is not applicable to individual projects as it involves support for electric vehicle technologies. MM AQ-5 requires, if and to the extent feasible, the use of zero-emission or near zero emission on-road heavy duty trucks as part of business operations beginning in 2025 (within at least 25 percent of the Project fleet) and the use of zero-emission or near zero emission on-road heavy duty trucks as part of the business operations beginning in 2029 (within at least 50 percent of the Project fleet). Additionally, see **Topical Response 1: Sustainable Project Design Features and Mitigation Measures**, above, which discusses features of the proposed Project that will reduce emissions and challenges associated with the electrification of the delivery trucks. MM AQ-5 and the measures outlined in the **Topical Response 1: Sustainable Project Design Features and Mitigation Measures** are the mitigation measures that can be feasibly implemented for the Project.
Piston-Engine Aircraft Lead Emissions	
EPA issued a proposed determination in October 2022 that lead emissions from certain aircraft engines cause or contribute to air pollution that may reasonably be anticipated to endanger public health and welfare. EPA refers to this action collectively as the "endangerment finding." After evaluating comments on the proposal, EPA plans to issue any final endangerment finding in 2023.	As discussed in Attachment A to the Air Quality Technical Report (Appendix 5.2-1 to the Draft EIR), although lead is a criteria pollutant, it was not evaluated because the proposed Project would not involve piston aircraft and the use of aviation gasoline (avgas), a common source of lead emissions. As such, the proposed Project would have a negligible impact on lead levels in the South Coast Air Basin.

TABLE C-3
SCAQMD REFERENCE DOCUMENTS MEASURES

Measure	Applicability/Feasibility to the proposed Project
EPA is working with our federal colleagues, and state and local partners, to understand and explore regulatory and non-regulatory approaches to reduce air emissions from the aircraft, rail, marine, and other nonroad sectors, especially in communities that are most severely impacted by these emissions.	This measure is not applicable to individual projects as it involves collaboration with federal colleagues, and state and local partners on aircraft emissions.
EPA's Approach to the Inflation Reduction Act	
EPA will begin launching Inflation Reduction Act transportation programs in the coming years. These programs will have a focus on environmental justice and Justice40.	This measure is not applicable to individual projects as it involves transportation programs.

Notes:

1 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. Accessed May 2023.

2 SCAQMD. *2022 South Coast AQMP*. Available at: http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan. Accessed May 2023.

3 SCAQMD. *2022 South Coast AQMP*. Available at: http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan. Accessed May 2023.

4 SCAQMD. *2022 South Coast AQMP*. Available at: http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan. Accessed May 2023.

5 US EPA: Mobile Source Pollution - Environmental Justice and Transportation. Available at: https://www.epa.gov/mobile-source-pollution/environmental-justice-and-transportation. Accessed May 2023.

Comment C-8:

As mentioned in the Draft EIR, an emergency power system would be installed with six (6) 2,200-kilovolt-ampere (kVA) diesel engine generators (four in Phase 1 and two in Phase 2); thus, permits from South Coast AQMD are required to construct and operate. Therefore, the Lead Agency should use good faith effort to include a discussion of any equipment utilized in the Proposed Project's construction and operation that will require South Coast AQMD permits and identify South Coast AQMD as a Responsible Agency in the Final EIR. Any assumptions for the stationary sources in the Final EIR will also be used as the basis for the permit conditions and limits for the Proposed Project. Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions on permits. For more general information on permits, please visit South Coast AQMD's webpage at: http://www.aqmd.gov/home/permits.

Response C-8:

SCAQMD was listed as a Responsible Agency in Table 3.7: Intended Uses of the EIR in the Draft EIR. The proposed Project would require an emergency generator and fire pump permit from SCAQMD, as identified in this table. Equipment for construction are listed in Tables 5.2-7 and 5.2-9 of the Draft EIR. GSE are listed on page 5.2-60 in the Draft EIR. The emissions ramifications of this permitted equipment was included in the Draft EIR.

Comment C-9:

Conclusion

Pursuant to California Public Resources Code section 21092.5(a) and CEQA Guidelines section 15088(b), South Coast AQMD staff requests that the Lead Agency provide South Coast AQMD staff with written responses to all comments contained herein, at least 10 days prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail, giving reasons why specific comments and suggestions are not accepted. There should be good faith and reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision-makers and to the public who are interested in the Proposed Project.

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

Response C-9:

Good faith and reasoned written responses are provided in **Topical Response 1: Sustainable Project Design Features and Mitigation Measures** and **Responses to Comments C-1** through **C-8**, above. SCAQMD is on the list of agencies to receive notifications related to the proposed Project. No further response is necessary.

Main Office - 825 East Third Street, San Bernardino, CA 92415-0835 | Phone: 909.387.7910 Fax: 909.387.7911

SAN BERNARDINO COUNTY

Department of Public Works
- Flood Control
- Operations
- Solid Waste Management
- Special Districts
- Surveyor
- Transportation

www.SBCounty.gov

Brendon Biggs, M.S., P.E.
Director

Noel Castillo, P.E.
Assistant Director

David Doublet, M.S., P.E.
Assistant Director

April 20th, 2023

Transmitted Via Email
File: 10(ENV)-4.01

Ontario International Airport Authority (OIAA)
Attn: Kevin Keith
OIAA Administrative Offices
1923 East Avion Street
Ontario, CA 91761
kkeith@flyontario.com

RE: NOTICE OF AVAILABILITY (NOA) OF DRAFT ENVIRONMENTAL IMPACT REPORT (EIR), ONTARIO INTERNATIONAL AIRPORT SOUTH CARGO CENTER PROJECT. THE ONTARIO INTERNATIONAL AIRPORT AUTHORITY (OIAA).

Dear Mr. Keith:

Thank you for allowing the San Bernardino County Department of Public Works the opportunity to comment on the above-referenced project. **We received this request on March 14, 2023,** and pursuant to our review, the following comments are provided:

Permits/Operations Support Division (Johnny Gayman, Chief, 909-387-7995):

1. The proposed Project is located adjacent to an Army Corps of Engineers (ACOE) Facility that is maintained by San Bernardino County Flood Control. Any encroachment within the easement may require a 408 Permit and a San Bernardino County Flood Control Permit. If you have any questions regarding this process, please contact the FCD Permit Section at (909) 387-1863.

D-1

We respectfully request to be included on the circulation list for all project notices, public reviews, or public hearings. In closing, I would like to thank you again for allowing the San Bernardino County Department of Public Works the opportunity to comment on the above-referenced project. Should you have any questions or need additional clarification, please contact the individuals who provided the specific comment, as listed above.

D-2

Sincerely,

Nancy Sansonetti

Nancy Sansonetti, AICP
Supervising Planner
Environmental Management

COMMENT LETTER D

San Bernardino County, Department of Public Works
Nancy Sansonetti, AICP, Supervising Planner, Environmental Management
April 20, 2023

Comment D-1:

Thank you for allowing the San Bernardino County Department of Public Works the opportunity to comment on the above-referenced project. We received this request on March 14, 2023, and pursuant to our review, the following comments are provided:

Permits/Operations Support Division (Johnny Gayman, Chief, 909-387-7995):

1. The proposed Project is located adjacent to an Army Corps of Engineers (ACOE) Facility that is maintained by San Bernardino County Flood Control. Any encroachment within the easement may require a 408 Permit and a San Bernardino County Flood Control Permit. If you have any questions regarding this process, please contact the FCD Permit Section at (909) 387-1863.

Response D-1:

This comment states that a Section 408 permit (33 United States Code [USC] Section 408) and County Flood Control Permit may be required related to the proposed Project. As explained below, because the proposed Project does not impact or interfere with the Cucamonga Channel (Channel) or associated access roads, no such permits should be required. The proposed Project is consistent with easements granted to OIAA's predecessor in interest to the San Bernardino County Flood Control District (SBCFCD) to allow for construction of the flood control Channel and the conveyance of storm and flood waters on Airport property. The proposed Project is consistent with the broad reservation of development rights for Airport uses that is contained in the easement grants for the Channel. The right to construct and maintain structures within the flood control Channel easement areas was expressly reserved to the Airport operator. Easements granted to SBCFCD and recorded on June 31, 1953 (Book 3180, page 453) and on February 10, 1959 (Book 4728, page 324), both reserved rights for the Airport operator as follows:

> *"… at any and all times, from time to time to enter upon said real property [the easement area] and to construct and maintain upon said property any and all water and/or gas conduits, transmission lines,* ***or other structures****, which shall not unreasonably interfere with the uses herein prescribed for the District; each of which reserved rights shall be and remain a continuing right which may be exercised by the undersigned at any time and from*

> *time to time, and the exercise of such right shall never impair the power of the undersigned to again exercise any such right." (Emphasis supplied.)*

The 1953 and 1959 easements referenced above are incorporated by reference into this response to the SBCFCD comment letter.

Continuing rights of the Airport operator to develop and use parts of the easement area for Airport purposes, without unreasonably interfering with operations of the flood control Channel, were expressly anticipated with and incorporated into the easement grants to the SBCFCD. Here, the proposed Project will not alter, modify, impact, or interfere at all with, let alone unreasonably interfere with, any flood control Channel walls or structures, or the adjoining access roads. All such items will remain intact. (See Draft EIR Section 3.4, Figures 3.3, 3.13a, and 3.13b; see also **Attachment 1.0** to this RTC, page 1-3).

Further, the Airport's reserved development and maintenance rights for structures and improvements within the easement areas related to the proposed Project are consistent with the OIAA's express purpose and function as a public agency to operate an international airport and to promote aeronautical uses at the Airport.

In addition, Airport structures, including airport aprons and other paved areas, existed within the Channel easement areas at the time of the easement grants in 1953 and 1959, and have continued since then. (See 1959 and 1966 aerial photos in **Figures 1** and **2**, below.)

The proposed Project will remove one existing building within the easement area. Moreover, the proposed Project will result in a reduction of paved areas within the easement areas over existing conditions. Currently, a portion of the pavement associated with an existing Airport aircraft apron is located within the edge of the Channel easement by approximately 76-feet at its maximum extent. A replacement aircraft apron will be constructed as part of the proposed Project and will be located within the edge of the Channel easement area by approximately 63-feet at its maximum extent. A clearway between the replacement apron edge/airport security fence and existing Channel wall will be maintained for SBCFCD access and maintenance purposes. (See **Attachment 1.0** to this RTC, page 1-2.)

Moreover, design elements for the proposed Project will significantly reduce surface stormwater flows from the proposed Project area and will substantially improve the water quality of the reduced stormwater discharges. Two separate drainage systems will be constructed as part of the proposed Project. These drainage systems will capture and convey all stormwater on site to new underground infiltration systems in a low-impact-design (LID) feature. One LID system will be installed to provide stormwater quality for the parking garage site and the other LID system

will be installed to provide stormwater quality for the main site. These systems will allow infiltration of the stormwater promoting groundwater recharge. (See Draft EIR Section 5.9.3.3; Draft EIR Appendices 5.9-1 and 5.9-2; and **Attachment 1.0** to this RTC, page 3). The infiltration systems will greatly reduce the amount of stormwater runoff that will be discharged into the Channel compared to current volumes. The predevelopment 100-year discharge flow rate for the main site and parking garage site are 269 cubic feet per second (cfs) and 28 cfs, respectively. The post-development flow rates for the main site and parking garage site are 24 cfs and 9 cfs, respectively. (See Draft EIR Section 5.9.3.3; and Draft EIR Appendices 5.9-1 and 5.9-2.)

Sediment chambers and oil/water separators will also be installed to improve water quality being discharged into the Channel. (See Draft EIR Section 5.9.3.3; Draft EIR Appendices 5.9-1 and 5.9-2; and **Attachment 1.0** to this RTC, page 3). The existing stormwater system currently discharges through two separate outlet windows through the Channel wall. The new system will abandon these two windows and ultimately discharge through a single existing outlet window in the southeast portion of the site. (See Draft EIR Section 5.9.3.3; see also Draft EIR Appendices 5.9-1 and 5.9-2; **Attachment 1.0** to this RTC, page 3).

Based on this information, the proposed Project will not alter, modify, impact, or interfere at all with, let alone unreasonably interfere with, any flood control Channel walls or structures, or the adjoining access roads. Elements of the proposed Project are also consistent with the Airport's reserved rights to construct and maintain improvements within the easement areas. No Section 408 permit or County Flood Control permit are, therefore, required relating to the proposed Project.

Comment D-2:

We respectfully request to be included on the circulation list for all project notices, public reviews, or public hearings. In closing, I would like to thank you again for allowing the San Bernardino County Department of Public Works the opportunity to comment on the above-referenced project. Should you have any questions or need additional clarification, please contact the individuals who provided the specific comment, as listed above.

Response D-2:

The San Bernardino County Department of Public Works has been added to the list of agencies to receive notifications related to the proposed Project. No further response is necessary.

SOURCE: US Department of Agriculture - 1959

FIGURE **1**

Meridian Consultants

1959 ONT Aerial Photo
US Department of Agriculture Sept 5 – Nov 24, 1959

332-001-21

SOURCE: US Geological Survey - 1966

FIGURE **2**

Meridian Consultants

1966 ONT Aerial Photo
US Geological Survey April 16, 1966

332-001-21

Attachment 1.0

TAXIWAY 'S'

SERVICE ROAD

BRIDGE

BLDG.

BLDG.

BLDG.

HANGAR

HANGAR

SAAP DRIVE

CUCAMONGA CHANNEL EASEMENT CENTERLINE
(PER LEGAL DESCRIPTION RECORDS)

CUCAMONGA CHANNEL WALL
(TYP)

EX. AIRFIELD APRON
PAVEMENT CURRENTLY
WITHIN CUCAMONGA
CHANNEL EASEMENT
(RED CROSS HATCH AREA)

CLEARWAY BETWEEN THE
EXISTING FENCE/APRON EDGE
AND CHANNEL WALL
(MAGENTA SOLID HATCH AREA)

EX. AIRPORT SECURITY
FENCE

76'

HANGAR

CUCAMONGA CHANNEL

CUCAMONGA CHANNEL
EASEMENT LINE
(TYP)

E. AVION ST.

BRIDGE

EX. BUILDING CURRENTLY
INSIDE CUCAMONGA
CHANNEL EASEMENT

BLDG.

UNION PACIFIC RAILROAD METROLINK

E. MISSION BLVD

BLDG.

N

GRAPHIC SCALE (FEET)

0 50 100 200

REV	DESCRIPTION	DATE	BY

CHA
Union Station, 300 S. Meridian St.
Indianapolis, IN 46225
Main: (317) 780-8481 • www.chacompanies.com

SOUTH AIRPORT CARGO CENTER (SACC)

CUCAMONGA CHANNEL EASEMENT & EXISTING CONDITIONS

ONTARIO, CALIFORNIA

DRN BY	DATE	TITLE	
JPB	09/27/2022		
CHKD BY	DATE		
JPB	09/27/2022		
APPD BY	DATE		
MJD	09/27/2022	DRAWING NO:	
SCALE		070438 PH1	
AS NOTED			

REV: | SHT: 1 OF 9

File Name: V:\Projects\ANY\K6\070438.000\09_Design\Exhibits\Flood Control District-Cucamonga Channel ROW\Existing Conditions with Cucamonga Channel ROW.dwg - Ex. Condition
Modified / By: November 17, 2022 9:36:38 AM / 5470
Plotted / By: December 13, 2022 11:40:15 AM / Barber, Jim

TAXIWAY 'S'

SERVICE ROAD

TAXILANE 'B'

TAXILANE 'A'

BRIDGE

BLDG.

BLDG.

SAAP

BLDG.

SAAP DRIVE

PROPOSED AIRFIELD APRON

PROPOSED SORT FACILITY

PROPOSED TRUCK YARD

CUCAMONGA CHANNEL

CUCAMONGA CHANNEL WALL (TYP)

PROPOSED AIRFIELD APRON PAVEMENT WITHIN CUCAMONGA CHANNEL EASEMENT (BLUE CROSS HATCH AREA)

A 20' (MIN.) WIDE CLEARWAY BETWEEN THE PERIMETER FENCE/PAVEMENT EDGE AND THE CHANNEL WALL SHALL BE MAINTAINED (SOLID MAGENTA HATCH AREA)

CUCAMONGA CHANNEL EASEMENT CENTERLINE (PER LEGAL DESCRIPTION RECORDS)

CUCAMONGA CHANNEL EASEMENT LINE (TYP)

PROPOSED AIRPORT SECURITY FENCE

BRIDGE

E. AVION ST.

FUTURE E. AVION ST.

OIAA MAINTENANCE

UNION PACIFIC RAILROAD METROLINK

E. MISSION BLVD

PROPOSED PARKING GARAGE

N

GRAPHIC SCALE (FEET)

0 50 100 200

REV	DESCRIPTION	DATE	BY

CHA
Union Station, 300 S. Meridian St.
Indianapolis, IN 46225
Main: (317) 780-8481 • www.chacompanies.com

SOUTH AIRPORT CARGO CENTER (SACC)

CUCAMONGA CHANNEL EASEMENT & PROPOSED CONDITIONS

ONTARIO, CALIFORNIA

DSN BY	DATE	TITLE
JPB	09/27/2022	
CHK'D BY	DATE	
JPB	09/27/2022	
APP'D BY	DATE	
MJD	09/27/2022	
SCALE		DRAWING NO:
AS NOTED		070438 PH1

REV: 2 SHT: OF 9

File Name: V:\Projects\ANY\K\070438.000\09_Design\Exhibits\Flood Control District-Cucamonga Channel ROW\Proposed Conditions with Cucamonga Channel ROW.dwg - Prop. Conditions
Modified / By: November 17, 2022 10:43:47 AM / 5470
Plotted / By: December 13, 2022 11:49:37 AM / Barber, Jim

***THE TABLE BELOW SHOWS THE COMPARISION OF PRE-DEVELOPMENT VERSUS POST-DEVELPMENT PEAK FLOW RATES DISCHARGING INTO THE CUCAMONGA CHANNEL FROM THE FUTURE SOUTH AIRPORT CARGO CENTER.**

THE PRE-DEVELOPMENT FLOW RATES WERE CALCULATED USING EXISTING CONTOUR DATA AND AVAILBLE UNDERGROUND UTILITY DATA.

THE POST-DEVELOPMENT FLOW RATES WERE CALCULATED USING THE PROPOSED DRAINAGE DESIGN FOR THE SACC MAIN SITE AND SACC PARKING GARAGE SITE WHICH WILL UTILIZE TWO (2) SEPARATE UNDERGROUND INFILTRATION/STORAGE SYSTEMS (LOW-IMPACT DESIGN FEATURES).*

PEAK FLOW RATE COMPARISON

STORM (Year)	PRE-DEVELOPMENT MAIN SITE (cfs)	PRE-DEVELOPMENT GARAGE SITE (cfs)	POST-DEVELOPMENT MAIN SITE (cfs)	POST-DEVELOPMENT GARAGE SITE (cfs)
2	105	11	0	0
5	144	15	0	0
10	174	18	0	0
25	213	22	20	2
50	241	25	22	7
100	269	28	24	9

TAXIWAY 'S'
SERVICE ROAD
TAXILANE 'B'
TAXILANE 'A'
BRIDGE
PROPOSED AIRFIELD APRON
PROP. STORM CATCH BASIN (TYP)
PROP. STORM PIPE (TYP)
BLDG.
SAAP DRIVE
PROPOSED SORT FACILITY
PROPOSED TRUCK YARD
CUCAMONGA CHANNEL
TWO EXISTING OUTLET WINDOWS IN THE CHANNEL WALL WILL BE ABANDONED
PROPOSED SEDIMENT CHAMBER
PROPOSED OIL-WATER SEPARATOR
PROPOSED MAIN SITE UNDERGROUND INFILTRATION SYSTEM
FUTURE E. AVION STREET DRAINAGE SYSTEM (TYP)
E. AVION ST.
OIAA MAINTENANCE
BRIDGE
CONNECT PROPOSED PARKING GARAGE SYSTEM TO FUTURE E. AVION STREET DRAINAGE SYSTEM HERE
PROPOSED PARKING GARAGE UNDERGROUND INFILTRATION SYSTEM
PROPOSED PARKING GARAGE
FUTURE E. AVION ST.
CONNECT PROPOSED MAIN SITE SYSTEM TO FUTURE E. AVION STREET DRAINAGE SYSTEM HERE
UNION PACIFIC RAILROAD METROLINK
E. MISSION BLVD
FUTURE E. AVION STREET SYSTEM TO DISCHARGE TO EXISTING DITCH HERE BEFORE ULTIMATELY DISCHARGING TO THE CHANNEL
N
GRAPHIC SCALE (FEET)
0 50 100 200

REV	DESCRIPTION	DATE	BY

CHA
Union Station, 300 S. Meridian St.
Indianapolis, IN 46225
Main: (317) 780-8661 • www.chacompanies.com

SOUTH AIRPORT CARGO CENTER (SACC)
PROPOSED STORMWATER DISCHARGE TO CUCAMONGA CHANNEL
ONTARIO, CALIFORNIA

DRN BY	DATE	TITLE
JPB	09/27/2022	
CHK'D BY	DATE	
JPB	09/27/2022	
APP'D BY	DATE	
MJD	09/27/2022	
SCALE		DRAWING NO:
AS NOTED		070438 PH1

REV: SHT: 3 OF 9

File Name: V:\Projects\ANY\K\070438.00\09_Design\Exhibits\Flood Control District-Cucamonga Channel ROW\Proposed Conditions with Cucamonga Channel ROW.dwg - Prop. Conditions with Drainage
Modified / By: December 21, 2022 3:30:47 PM / (5470)
Plotted / By: December 21, 2022 4:53:52 PM / Barber, Jim

CITY OF ONTARIO
303 EAST B STREET | ONTARIO, CALIFORNIA 91764
(909) 395-2000 FAX (909) 395-2070 OntarioCA.gov

April 27, 2023

Ontario International Airport Authority
Attn: Kevin Keith
OIAA Administrative Offices
1923 East Avion Street
Ontario, CA 91761

Re: Draft EIR South Airport Cargo Center Comments

Dear Mr. Keith,

The City of Ontario Planning Department appreciates the opportunity to comment on the above-mentioned project. The attached redlined comments recommend revisions to the Traffic Analysis (Synchro Analysis), Table1-2, Section 3.0, Section 5.9, and Figures 5.8-2, 5.14-1, 5.14-2 and 5.14-3.

If you should have any questions, please contact Lorena Mejia, Senior Planner at (909) 395-2428 (lmejia@ontarioca.gov or myself at (909)395-2422.

E-1

Sincerely,

Rudy Zeledon, Community Development Assistant Director
Community Development Administration

c: Scott Murphy, Community Development Executive Director, AICP

CITY OF ONTARIO
MEMORANDUM

Development Plan Review

Project: Ontario International Airport-South Ontario Airport Cargo Center Traffic Analysis
Location: Avion Street between Vineyard Avenue and Jurupa Street

Date: April 26, 2023

By: Jaime Maciel-Carrera

The following comments on the subject project are provided for the benefit of City Engineering and Planning staff and the applicant. These are not the conditions of approval which will be submitted under separate cover.

Traffic Analysis/EIR Comments:

1. The Synchro analysis for the Opening Year (2025) Plus Phase 1 Project-PM Peak Hour Scenario appears to have a typo for the thru lane volumes for the eastbound and westbound directions. The project volumes may have been left out of the analysis which would affect the delay calculation. See attached markup.

jmc;

E-2

HCM 6th Signalized Intersection Summary
17: Archibald Ave & Mission Blvd

Ontario Airport South Cargo Center
Opening Year (2025) Plus Phase 1 Project - PM Peak Hour

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	110	885	260	70	738	20	160	258	110	30	346	141
Future Volume (veh/h)	110	885	260	70	738	20	160	258	110	30	346	141
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		0.99	1.00		0.99	1.00		0.99	1.00		0.99
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Adj Flow Rate, veh/h	118	952	185	75	794	22	172	277	22	32	372	152
Peak Hour Factor	0.93	0.93	0.93	0.93	0.93	0.93	0.93	0.93	0.93	0.93	0.93	0.93
Percent Heavy Veh, %	0	0	0	0	0	0	0	0	0	0	0	0
Cap, veh/h	146	931	413	127	887	25	316	332	279	27	310	127
Arrive On Green	0.08	0.26	0.26	0.07	0.25	0.25	0.17	0.17	0.17	0.26	0.26	0.26
Sat Flow, veh/h	1810	3610	1601	1810	3587	99	1810	1900	1596	104	1206	493
Grp Volume(v), veh/h	118	952	185	75	399	417	172	277	22	556	0	0
Grp Sat Flow(s),veh/h/ln	1810	1805	1601	1810	1805	1881	1810	1900	1596	1803	0	0
Q Serve(g_s), s	7.5	30.1	11.3	4.7	25.0	25.0	10.1	16.4	1.3	30.0	0.0	0.0
Cycle Q Clear(g_c), s	7.5	30.1	11.3	4.7	25.0	25.0	10.1	16.4	1.3	30.0	0.0	0.0
Prop In Lane	1.00		1.00	1.00		0.05	1.00		1.00	0.06		0.27
Lane Grp Cap(c), veh/h	146	931	413	127	446	465	316	332	279	463	0	0
V/C Ratio(X)	0.81	1.02	0.45	0.59	0.89	0.89	0.54	0.83	0.08	1.20	0.00	0.00
Avail Cap(c_a), veh/h	388	931	413	310	464	484	465	488	410	463	0	0
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
Uniform Delay (d), s/veh	52.7	43.3	36.3	52.6	42.4	42.4	43.9	46.5	40.3	43.3	0.0	0.0
Incr Delay (d2), s/veh	7.6	35.4	1.6	1.6	20.4	19.8	1.8	8.8	0.1	109.1	0.0	0.0
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	3.6	17.2	4.4	2.1	13.0	13.5	4.6	8.4	0.5	26.8	0.0	0.0
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	60.3	78.7	38.0	54.2	62.8	62.2	45.7	55.3	40.4	152.4	0.0	0.0
LnGrp LOS	E	F	D	D	E	E	D	E	D	F	A	A
Approach Vol, veh/h		1255			891			471			556	
Approach Delay, s/veh		71.0			61.8			51.1			152.4	
Approach LOS		E			E			D			F	
Timer - Assigned Phs	1	2		4	5	6		8				
Phs Duration (G+Y+Rc), s	15.7	37.6		36.5	16.9	36.4		26.9				
Change Period (Y+Rc), s	7.5	7.5		6.5	7.5	7.5		6.5				
Max Green Setting (Gmax), s	20.0	30.0		30.0	25.0	30.0		30.0				
Max Q Clear Time (g_c+I1), s	6.7	32.1		32.0	9.5	27.0		18.4				
Green Ext Time (p_c), s	0.1	0.0		0.0	0.2	1.9		2.0				
Intersection Summary												
HCM 6th Ctrl Delay			79.7									
HCM 6th LOS			E									

Notes
User approved ignoring U-Turning movement.

Fehr & Peers

Synchro 11 Report

E-2 cont'd

HCM 6th Signalized Intersection Summary
17: Archibald Ave & Mission Blvd

Ontario Airport South Cargo Center
Opening Year (2025) Without Project - PM Peak Hour

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	110	895	260	70	745	20	160	240	110	30	320	141
Future Volume (veh/h)	110	895	260	70	745	20	160	240	110	30	320	141
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		0.99	1.00		0.99	1.00		0.99	1.00		0.99
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Adj Flow Rate, veh/h	118	962	185	75	801	22	172	258	21	32	344	152
Peak Hour Factor	0.93	0.93	0.93	0.93	0.93	0.93	0.93	0.93	0.93	0.93	0.93	0.93
Percent Heavy Veh, %	0	0	0	0	0	0	0	0	0	0	0	0
Cap, veh/h	146	940	417	129	898	25	299	314	264	28	305	135
Arrive On Green	0.08	0.26	0.26	0.07	0.25	0.25	0.17	0.17	0.17	0.26	0.26	0.26
Sat Flow, veh/h	1810	3610	1601	1810	3588	99	1810	1900	1596	109	1171	518
Grp Volume(v), veh/h	118	962	185	75	403	420	172	258	21	528	0	0
Grp Sat Flow(s),veh/h/ln	1810	1805	1601	1810	1805	1882	1810	1900	1596	1798	0	0
Q Serve(g_s), s	7.4	30.0	11.1	4.6	24.8	24.8	10.1	15.1	1.3	30.0	0.0	0.0
Cycle Q Clear(g_c), s	7.4	30.0	11.1	4.6	24.8	24.8	10.1	15.1	1.3	30.0	0.0	0.0
Prop In Lane	1.00		1.00	1.00		0.05	1.00		1.00	0.06		0.29
Lane Grp Cap(c), veh/h	146	940	417	129	452	471	299	314	264	468	0	0
V/C Ratio(X)	0.81	1.02	0.44	0.58	0.89	0.89	0.57	0.82	0.08	1.13	0.00	0.00
Avail Cap(c_a), veh/h	393	940	417	314	470	490	471	495	415	468	0	0
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	0.00
Uniform Delay (d), s/veh	52.1	42.6	35.6	51.9	41.7	41.7	44.4	46.4	40.7	42.6	0.0	0.0
Incr Delay (d2), s/veh	7.5	35.5	1.6	1.6	19.7	19.1	2.1	7.1	0.2	81.6	0.0	0.0
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	3.5	17.1	4.3	2.1	12.8	13.3	4.6	7.6	0.5	23.3	0.0	0.0
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	59.6	78.1	37.2	53.4	61.4	60.8	46.5	53.5	40.8	124.2	0.0	0.0
LnGrp LOS	E	F	D	D	E	E	D	D	D	F	A	A
Approach Vol, veh/h		1265			898			451			528	
Approach Delay, s/veh		70.4			60.5			50.2			124.2	
Approach LOS		E			E			D			F	

Timer - Assigned Phs	1	2		4	5	6		8				
Phs Duration (G+Y+Rc), s	15.7	37.5		36.5	16.8	36.4		25.6				
Change Period (Y+Rc), s	7.5	7.5		6.5	7.5	7.5		6.5				
Max Green Setting (Gmax), s	20.0	30.0		30.0	25.0	30.0		30.0				
Max Q Clear Time (g_c+I1), s	6.6	32.0		32.0	9.4	26.8		17.1				
Green Ext Time (p_c), s	0.1	0.0		0.0	0.2	2.0		1.9				

Intersection Summary	
HCM 6th Ctrl Delay	73.7
HCM 6th LOS	E

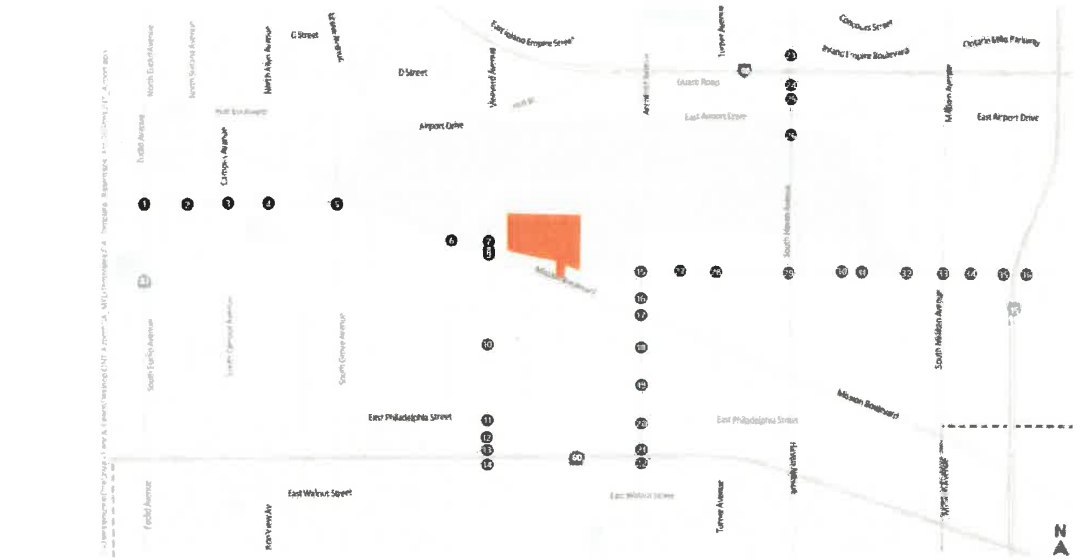
Notes

User approved ignoring U-Turning movement.

Fehr & Peers

Synchro 11 Report

E-2 cont'd



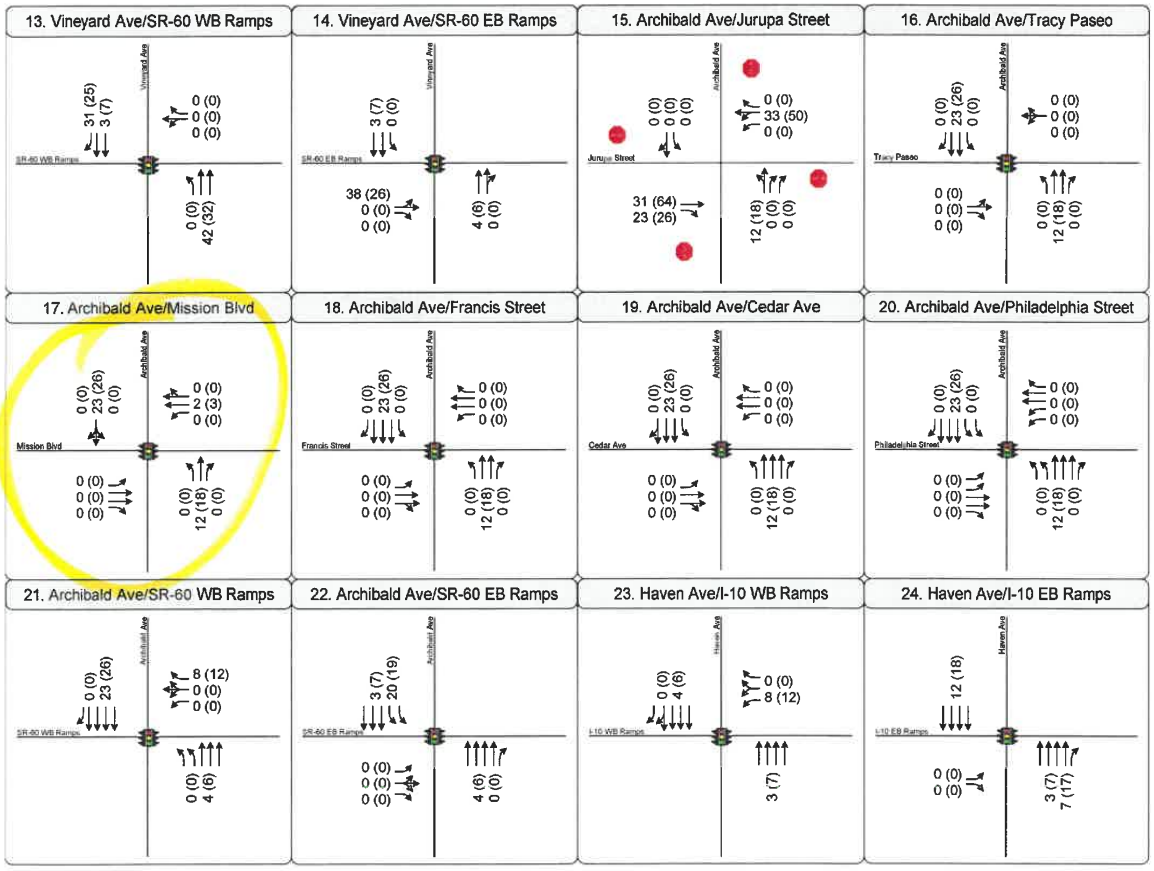


Figure 7

Phase I Project Only PCE Trip Assignment
Project Phase 1 Opening Year (2025) Plus Phase 1 Project Conditions

E-2 cont'd

TABLE 1-2
SUMMARY OF FINDINGS

Impact	Mitigation Measures	Significance after Mitigation
natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.		
Less Than Significant Impact. Short-term construction activities would require minimal water and are not expected to have any adverse impacts on the existing water system or available water supplies. During operation, the Air Cargo Sort Building would be connected to the existing 16-inch water main along East Avion Street. Water would be supplied to the Air Cargo Sort Building, parking garage, and aircraft apron, for consumption as well as fire suppression. The projected water demand for the Project site in the 2020 UWMP is sufficient to account for the water needed for the Project. The proposed Project would not require the construction of new or expanded water conveyance, treatment, or collection facilities. The impacts on water facilities during construction and operation would be less than significant, and no mitigation is required. Additionally, based on the available sewer line and wastewater treatment capacity, the proposed Project would not require the construction of new or expanded water conveyance, treatment, or collection facilities, and impacts would be less than significant. the Project would	There is no existing potable water main currently in Avion Street. The new 18-inch potable water main on Avion Street will be required to be designed and constructed between Vineyard Avenue and the point of connection east of the Cucamonga Creek Channel. All existing water services to remain will be connected to the new water There is no existing sewer main currently in Avion Street. The design and construction of a public sewer main extending from the point of connection will be required.	

E-3

E-4

by 65 feet long and would be located under the parking structure entrance drive. Based on preliminary design of the underground infiltration system, a 24-inch outlet pipe on the downstream side of the system would discharge the stormwater at a controlled rate not greater than 9 cfs (for the 100-year storm) into Cucamonga Channel. The underground systems would be surrounded by stone and filter media to treat the infiltrating stormwater. Pretreated stormwater would be discharged at a controlled rate to a new Avion Street drainage system that would be completed prior to the opening of the proposed Project, which would then discharge into the Cucamonga Channel.

Stormwater in the truckyard and visitor parking lot would be collected in a series of catch basins located within the truck yard and parking lot pavements. The stormwater collected would be conveyed westward to the main airfield apron drainage system via underground storm pipe. The stormwater collected from these areas would ultimately be treated in the same oil-water separator, sediment chamber, and underground storage/infiltration system being used for the aircraft apron area. The layout of this drainage system is shown in **Figure 3.16,** which includes 4 catch basins (3 in the truckyard and 1 in the parking lot).

E-5

Utilities

Water

There is no existing water main in Avion Street. The design and construction of a new 18-inch water main is required in accordance City of Ontario Standards.

Figure 3.17: Utility Systems Map was not included within the EIR.

E-6

Water would be provided to the Project site by the Ontario Municipal Utilities Company (OMUC). The proposed Project would tie into a 16-inch water main in East Avion Street at five locations. Each connection would have a gate valve and tapping sleeve. As shown in **Figure 3.17: Utility Systems Map**, water would be supplied to the Air Cargo Sort Building, parking structure, and aircraft apron for consumption and fire suppression.

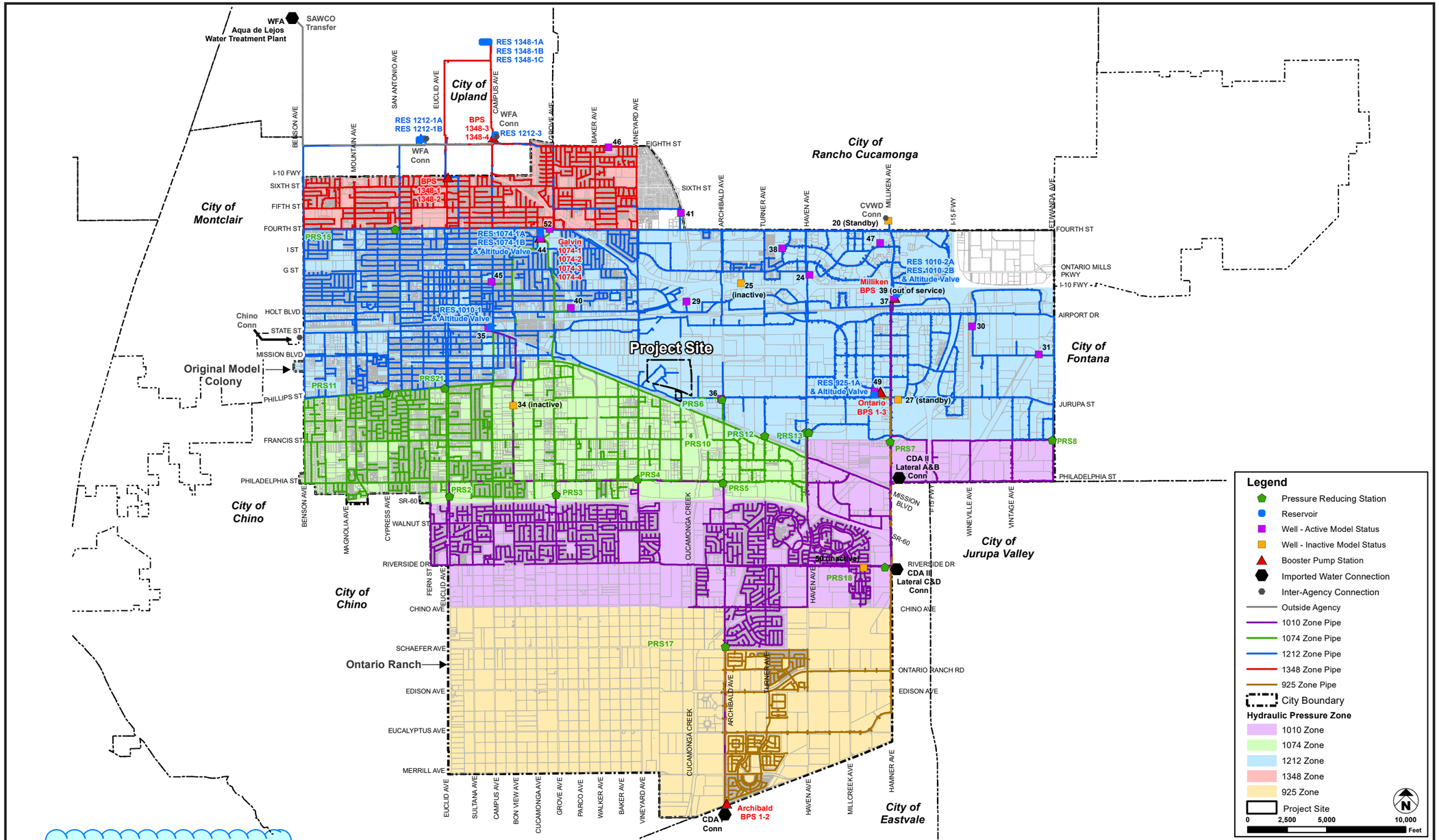
Two connections would occur along the southeast and southwest corners of the apron to feed water lines and hydrants along the east and west perimeters of the apron. Water lines would also connect to the Utility Substation Building, Aviation Line Maintenance Warehouse, and GSE Maintenance Building.

There is no existing sewer main in Avion Street. The design and construction of a sewer main is required in accordance with City of Ontario Standards.

E-7

Sewer

Sanitation service would be provided by the OMUC. As shown in **Figure 3.17,** one tie-in would be made to the municipal sewer line in East Avion Street, near the western limit of the Phase 1 construction area. Near the entry of the truckyard, the sewer line would split into two separate service lines serving the Air Cargo Sort Building. An oil-water separator would be installed in the truckyard, adjacent to the Air Cargo Sort Building to separate oil and water mixtures into their separate components generated from the cargo building, as well as surface runoff in the



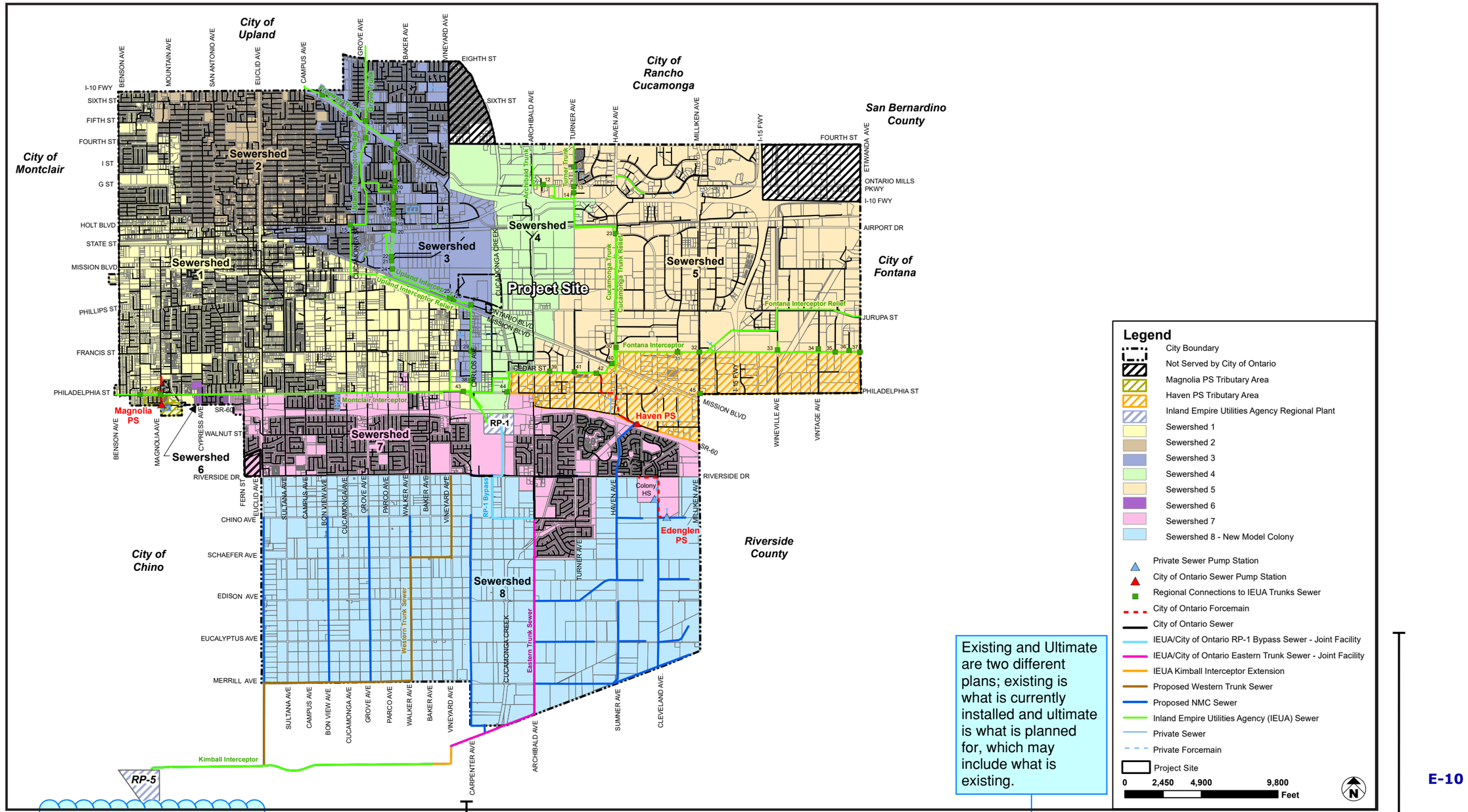
SOURCE: OMUC 2020 Water Master Plan Update – 2020

This is a DRAFT Master Plan.

FIGURE **5.14-1**

Existing Potable Water System for the City

E-8



SOURCE: City of Ontario Sewer Master Plan – Feb 2018

This was a DRAFT Master Plan.

E-9

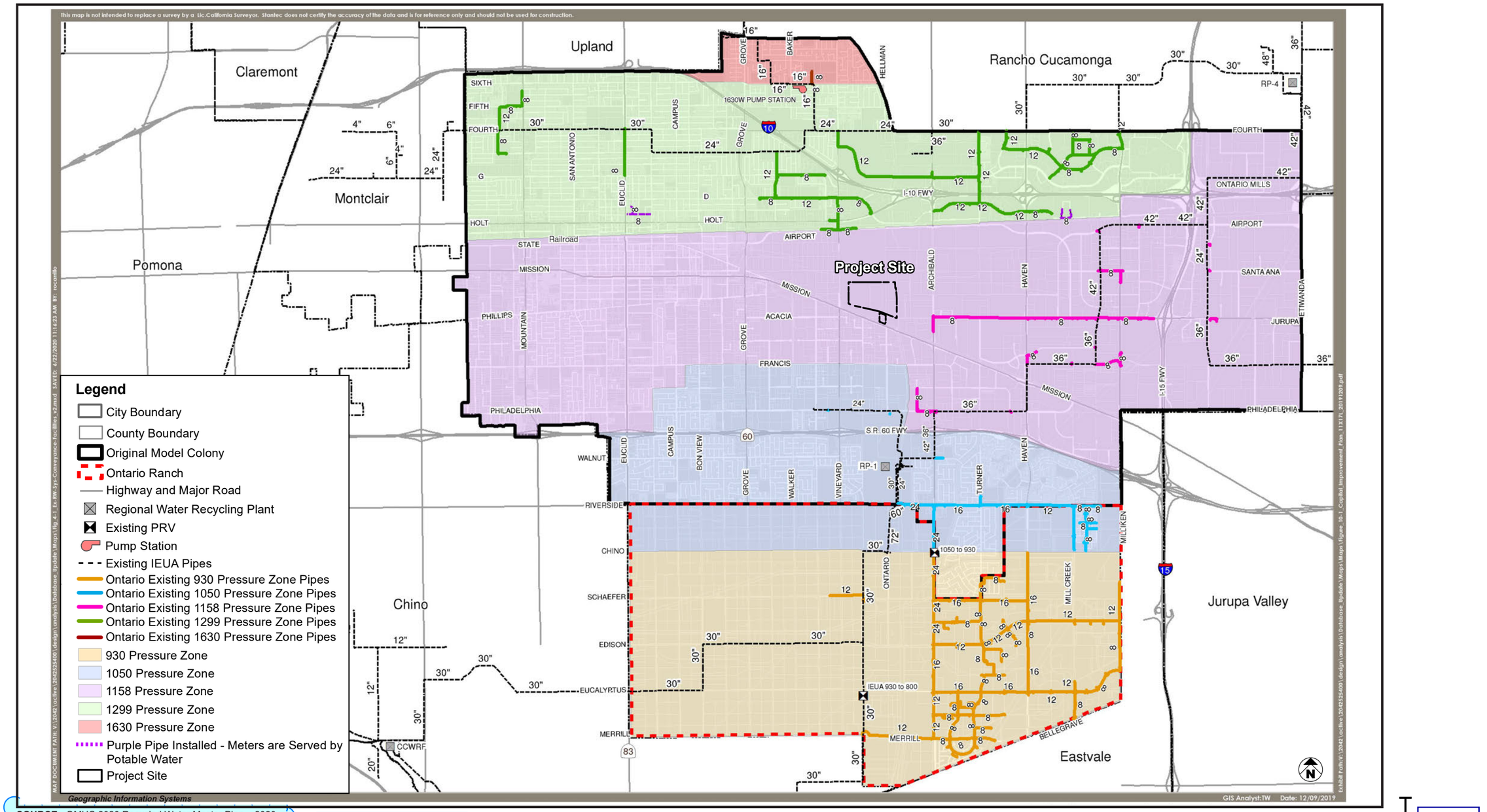
Existing and Ultimate are two different plans; existing is what is currently installed and ultimate is what is planned for, which may include what is existing.

E-10

FIGURE **5.14-2**

Existing Ultimate Sewer System for the City

Meridian Consultants



SOURCE: OMUC 2020 Recycled Water Master Plan – 2020

2020 RWMP is a DRAFT Master Plan.

FIGURE **5.14-3**

E-11

Meridian Consultants

Existing Recycled Water System for the City

TABLE 1-2
SUMMARY OF FINDINGS

Impact	Mitigation Measures	Significance after Mitigation
proposed Project would not impair adopted emergency response and evaluation plans. Therefore, the proposed Project would not result in, or be subject to, significant effects related to wildfire risk. No impact would occur.		
Hydrology		
Threshold HYD-1: Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?		
Less Than Significant Impact. The proposed stormwater treatment system for the proposed Project would target and reduce pollutants of concern in runoff from the proposed Project site in compliance with the San Bernardino County MS4 permit requirements. Submittal and implementation of the PWQMP, SWPPP, and the erosion control plan prior to the construction phase of the proposed Project would address the potential for construction of the Project to affect water quality. The proposed Project would comply with all applicable regional and local water quality standards and waste discharge requirements as stated above in the Regulatory Setting, including the MS4 permit and NPDES permit. Compliance with the regulatory requirements and conditions of the San Bernardino	No mitigation measures are necessary.	Less than significant.

A PWQMP for this project is required by the City of Ontario for MS4 Permit Compliance if only the runoff from the proposed Project site enters Ontario streets and storm drain system. If the project runoff enters the County channel directly or via Avion Street (private street), a PWQMP is not necessary. Please remove PWQMP from this text and other areas with similar context. Instead, the proposed project will need approval from the San Bernardino County Flood Control District (SBCFCD) for discharging into the Cucamonga Channel.

E-12

TABLE 1-2 SUMMARY OF FINDINGS		
Impact	**Mitigation Measures**	**Significance after Mitigation**
related to increase in runoff resulting in flooding would be less than significant.		
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff? **Less Than Significant Impact.** Project construction would comply with the requirements of the Construction General Permit and would include the preparation and implementation of a SWPPP and applicable BMPs. The incorporation of the proposed operational BMPs as stated in the PWQMP would allow the proposed Project to comply with San Bernardino County drainage requirements. Furthermore, on-site stormwater detention facilities including underground storage would be included in the proposed Project to reduce the amount of additional runoff into existing drainage facilities. Operational impacts related to creation or contribution of runoff water that would exceed the capacity of existing, or planned stormwater drainage systems or provide substantial additional sources of polluted runoff, would be less than significant.	No mitigation measures are necessary.	Less than significant.
iv. Impede or redirect flood flows?	No mitigation measures are necessary.	Less than significant.

A PWQMP for this project is required by the City of Ontario for MS4 Permit Compliance if only the runoff from the proposed Project site enters Ontario streets and storm drain system. If the project runoff enters the County channel directly or via Avion Street (private street), a PWQMP is not necessary. Please remove PWQMP from this text and other areas with similar context. Instead, the proposed project will need approval from the San Bernardino County Flood Control District (SBCFCD) for discharging into the Cucamonga Channel.

E-13

by the State of California through the Santa Ana RWQCB. The San Bernardino County Flood Control District has been designated "Principal Permittee" under the MS4 Permit, and administers and coordinates many of the permit requirements on behalf of all the Permittees. On January 29, 2010, the Santa Ana RWQCB, issued an area wide MS4 permit to the County and municipalities in San Bernardino County. Waste discharge requirements for stormwater entering municipal storm drainage systems are set forth in the MS4 permit, Order No. R8-2010-0036, NPDES No. CAS618036.[34] This permit expired on January 29, 2015. On August 1, 2014, the San Bernardino County Flood Control District submitted a Report of Waste Discharge (ROWD) on behalf of San Bernardino County and the 16 incorporated cities within San Bernardino County. The submitted ROWD serves as the permit renewal application for the fifth term MS4 permit for San Bernardino County.[35]

Local

City of Ontario

The City adopted a Preliminary Water Quality Management Plan (PWQMP) to implement the MS4 permit, which requires, as needed on a project-by-project basis, the integration stormwater management, water conservation, rainwater harvesting and re-use, and flood management to meet water quality standards. The San Bernardino County MS4 Permit requires project-specific Water Quality Management Plans (WQMP) to be prepared for all priority new development and significant redevelopment projects as specified in the City's PWQMP.

The City requires a PWQMP for any new development and significant redevelopment project in Ontario that has stormwater runoff enters the City's streets and storm drain system.

E-14

Ontario Policy Plan

The City's Policy Plan contains policies addressing stormwater infrastructure, groundwater quality, and other policies related to water resources within the Environmental Resources Element.[36]

[34] State Water Resources Control Boards. California RWQCB, Santa Ana Region. *ORDER NO. R8-2010-0036. NPDES NO. CAS618036. NPDES Permit and Waste Discharge Requirements*. https://www.waterboards.ca.gov/santaana/board_decisions/adopted_orders/orders/2010/10_036_sbc_ms4_permit_01_29_10.pdf. Accessed August 2022.

[35] San Bernardino County Santa Ana Region MS4 Stormwater Program. *Application for Renewal of the Municipal NPDES Stormwater Permit.* July 31, 2014. https://www.sawpa.org/wp-content/uploads/2018/04/2014_ROWD_San-Bernardino-County-MS4-Program.pdf. Accessed August 2022.

[36] City of Ontario. *The Ontario Plan*. "Environmental Resources Element." https://www.ontarioca.gov/about-ontario-ontario-plan-policy-plan/environmental-resources. Accessed October 2022.

listed in the Basin Plan for these constituents.[29] Other contamination of the groundwater basin occurs from point sources, such as industrial uses, that have released hazardous chemicals discussed above directly onto the soil.

Site Hydrology and Drainage

Surface drainage at the Airport flows generally to the south towards catch basins which discharge into three drainage area channels: West Cucamonga Channel, Cucamonga Channel, and Deer Creek.[30] The Cucamonga Channel extends from north to south across the Airport, between Airport Drive and Mission Boulevard. This is where the existing Project site drainage connects to. This channel drains the majority of industrial areas of the Airport. The drainage area discharging into Cucamonga Channel covers 928 acres of industrial and commercial tenant facilities, runways, and taxiways at the Airport. Storm water runoff flows into dozens of catch basins around the perimeter.

Please include an exhibit showing the four Drainage Areas described in this section and show the flow lines.

E-15

The proposed Project site includes approximately 97 acres located south of the Airport airfield and west of the Cucamonga Channel. The entire site has been graded and is largely developed with paved areas and buildings. The proposed Project site slopes gently to the south and west with elevations ranging from approximately 894 feet on the south end of the site, near East Avion Street, to approximately 919 feet on the north end near Taxiway 'S'.[31] The Project site is also partially located within a 100-year floodplain on the southeastern portion as shown in **Figure 5.9-1: Project Site Flood Zones**.

The proposed Project site contains four existing drainage areas, each with a different flow path.[32] Drainage Area #1 (DA-1) is the largest drainage area consisting of the entire western half of the proposed Project site and a portion of the eastern half. This area generally conveys stormwater in a northwest to southeast direction. As water flows southeast, it eventually flows across East

29 State Water Resources Control Boards. California RWQCB, Santa Ana Region. *Resolution No. R8-2004-0001. Resolution Amending the Water Quality Control Plan for the Santa Ana River Basin to Incorporate an Updated Total Dissolved Solids (TDS) and Nitrogen Management Plan for the Santa Ana Region*. https://www.waterboards.ca.gov/rwqcb8/board_decisions/adopted_orders/orders/2004/04_001.pdf. Accessed October 2022.

30 Ontario International Airport. *Storm Water Pollution Prevention Plan* (SWPPP) *Associated with Industrial Activities*. https://www.flyontario.com/sites/default/files/ontario_swppp_10_31_2016-amended_02-2018_final_0.pdf. Accessed March 2022.

31 Cotton, Shires, and Associates, Inc. *Geotechnical Investigation.* June 2022. (See **Appendix 5.6-1.**)

32 CHA. *South Airport Cargo Center at Ontario International Airport – Preliminary Hydrology Study for CEQA Submission*. January 31, 2022. Updated December 2022. (See **Appendix 5.9-1.**)

Does runoff from Drainage Areas # 1 thru #4 enter the Cucamonga Channel directly, without entering any City's streets? If yes, please state this clearly in the environmental document. Since there is no discharge to Ontario MS4 system, a PWQMP is not required for the project. Instead, the proposed project will need approval from the San Bernardino County Flood Control District (SBCFCD) for discharging into the Cucamonga Channel.

E-16

el. This swale eventually overtops the western wall of Cucamonga Channel near the abandoned buildings south of E. Avion Street. Drainage Area #2 (DA-2) generally conveys stormwater via a small swale in a north to south direction adjacent to the Cucamonga Channel from Taxiway 'S' to East Avion Street. Drainage Area #3 (DA-3) is between DA-1 and DA-2 and consists mostly of the existing airfield apron area. This area generally conveys stormwater on the airfield apron pavement from Taxiway 'S' to four different stormwater catch basins located on the east side of the apron. Drainage Area #4 (DA-4) is located south of E. Avion Street adjacent to Avion Place. Stormwater sheet flows to a collection area and is conveyed westward to the Cucamonga Channel through a series of culverts.

The majority of the Project site is within DA-1, DA-2, and DA-3 (Main Project Site), while the proposed parking garage site is within DA-4 (Parking Garage Site). Since all drainage areas ultimately discharge into the Cucamonga Channel, an analysis was performed on the three drainage areas comprising the Main Project site and DA-4 for the Parking Garage Site separately, in the Preliminary Hydrology study (see **Appendix 5.9-1**). Hydraflow Hydrograph Modeling software was used to calculate the combined peak runoff rate and combined total runoff volume for the storm frequency events as shown in **Table 5.9-1: Project Site Existing Conditions – DA-1, DA-2, and DA-3 (Main Project Site)** and **Table 5.9-2: Project Site Existing Conditions – DA-4 (Parking Garage Site)**.

TABLE 5.9-1
PROJECT SITE EXISTING CONDITIONS – DA-1, DA-2, AND DA-3 (MAIN PROJECT SITE)

Storm Event Frequency	Total Peak Flow Rate (cfs)[a]	Total Runoff Volume (cu. ft.)[b]
2-Year[c]	**105.1**	**715,034**
5-Year	143.5	985,054
10-Year	173.6	1,200,157
25-Year	212.5	1,480,449
50-Year	241.0	1,687,071
100-Year	268.9	1,890,661

Notes:

[a] *cfs – cubic feet per second*

[b] *cu.ft – cubic feet*

[c] *Per San Bernardino County Technical Guidance Document for Water Quality Management Plans (WQMP), only the 2-year storm is used to conduct analysis for comparing pre-development versus post-development.*

Source: CHA. *South Airport Cargo Center at Ontario International Airport – Preliminary Hydrology Study for CEQA Submission.* January 31, 2022 (Updated December 2022) (see **Appendix 5.9-1**).

The PWQMP and WQMP are used to address post construction stormwater quality issues. The City of Ontario requires all construction projects to submit a erosion control plan to address stormwater pollution and erosion control impacts associated with construction activities. Depending on the connection of the project drainage areas to the Cucamonga Channel, a PWQMP may not be required by the City. Please clarify this throughout the entire Environmental Impact Report.

Less Than Significant Impact.

Construction Impacts

Clearing, grading, excavation, and construction activities associated with the proposed Project have the potential to impact water quality through soil erosion and increasing the amount of silt and debris carried in runoff. Additionally, the use of construction materials, such as fuels, solvents, and paints, may present a risk to surface water quality. Finally, the refueling and parking of construction vehicles and other equipment on-site during construction may result in oil, grease, or related pollutant leaks and spills that may discharge into the storm drain system and/or soils.

E-17

The southern portion of the proposed Project site will be raised to match the elevation of the northern portion of the site adjacent to Taxiway 'S' while continuing to drain to the southeast corner of the site. Approximately 67,000 cubic yards of soil would be cut on this portion of the site and approximately 132,800 cubic yards of soil would be imported to raise the site for a total of approximately 200,000 cubic yards of earth moved to achieve the necessary grade.

To implement the San Bernardino County MS4 Permit issued by the Santa Ana RWQCB, the City maintains a PWQMP requirement in order for qualifying projects to plan for the integration of required water quality elements, stormwater management, water conservation, rainwater harvesting and re-use, and flood management.[42] As such, PWQMPs, are in compliance with the Santa Ana RWQCB and the San Bernardino County MS4 Permit. The San Bernardino County MS4 Permit requires project-specific WQMPs to be prepared for all priority new development and significant redevelopment projects specified in the City's PWQMP. The proposed Project qualifies as a "significant re-development project" according to the City's PWQMP, as the proposed Project would add or replace 5,000 or more square feet of impervious surface on an already developed site subject to discretionary approval of the Permittee.[43] The MS4 Permit stipulates that the City requires priority project applicants to submit a preliminary, project-specific WQMP, as early as possible, during the environmental review or planning phase of a development project and that the PWQMP be approved prior to the issuance of land use entitlement. The PWQMP for the proposed Project contains required site design/Low-Impact Design (LID) BMPs, source control BMPs, and treatment control BMPs. The PWQMP requires

42 City of Ontario. *Preliminary Water Quality Management Plan*. https://www.ontarioca.gov/sites/default/files/Ontario-Files/Engineering/environmental-services/preliminary_wqmp_s.pdf. Accessed June 2022.

43 City of Ontario. *Preliminary Water Quality Management Plan*. (See **Appendix 5.9-2.**)

Incorrect use of the source. City of Ontario has a PWQMP template that is available for use by any development and significant redevelopment project. However, this PWQMP template provides the typical BMPs for Site Design/LID, Source Control and Treatment Control and does not select the above BMPs for the proposed project.

infiltration, harvest and use, evapotranspiration, or bio-treatment designs depending on the project. The Project proposes infiltration Site Design/LID BMPs. The treatment control BMPs are designed to control stormwater pollutants where it is not feasible to install site design/LID BMPs or where pretreatment of stormwater runoff is required, ahead of infiltration BMPs. The proposed Project would implement a gravity separator device for pretreatment of sediment, trash/litter, or oil and grease, to improve integration of required water quality elements (see **Appendix 5.9-2**). BMPs for both construction and operation are shown in **Table 5.9-3: PWQMP BMPs**, below.

TABLE 5.9-3
PWQMP BMPS

Site Design/LID BMPs
• Grade parking lot areas/drive aisles/roof drains to sheet flow runoff into landscaped swales, via curb cuts or zero-face curbs or otherwise disconnect direct drainage from MS4.
• Install surface retention basins or infiltration trenches to receive impervious area runoff.
• Install underground stormwater retention chambers where downstream landscaped areas are limited.
• Construct streets, sidewalks, and parking lot stalls to the minimum widths necessary.
Source Control BMPs
• Minimize trash and debris in storm runoff through a regular parking lot, storage yard and roadway sweeping program.
• Site Owner(s)/Property Manager/HOA or POA will be familiar with the project WQMP and stormwater BMPs.
• Owner or HOA or POA to provide Education/Training of site occupants and employees on stormwater BMPs.
• Install stormwater placards/stenciled messages with a "No Dumping" message on all on-site/off-site storm drain inlets.
Treatment Control BMP
• Gravity Separator devices for pretreatment of sediment, trash/litter, or Oil & Grease

Source: City of Ontario Engineering Department. *Preliminary Water Quality Management Plan (PWQMP)* For compliance with Santa Ana Regional Water Quality Control Board Order Number R8-2010-0036 (NPDES Permit No. CAS618036) for South Airport Cargo Center (see **Appendix 5.9-2**).

E-18

OIAA maintains a NPDES permit to comply with federal regulations requiring transportation facilities with discharges from vehicle maintenance shops, equipment cleaning operations, or airport de-icing to be covered under an industrial permit. For landside projects affecting areas outside of OIAA management, contractors shall work with the City to obtain NPDES permit

The PWQMP will be used as a reference for the approval of the project WQMP (if any) and will not be used to address water quality impacts associated with construction activities. The erosion control plan will be used to address stormwater pollution and erosion control impacts associated with construction activities.

E-19

control plan would address any potential erosion and site preparation activities.

Submittal and implementation of the PWQMP, SWPPP, and the erosion control plan prior to the construction phase of the proposed Project would address the potential for construction of the Project to affect water quality. The proposed Project would comply with all applicable regional and local water quality standards and waste discharge requirements as stated above in the Regulatory Setting, including the MS4 permit and NPDES permit. As a result, with implementation of the regulatory requirements and standard conditions of the PWQMP, SWPPP, and the erosion control plan and compliance with applicable water quality standards and waste discharge requirements, water quality impacts associated with construction activities would be less than significant.

Operational Impacts

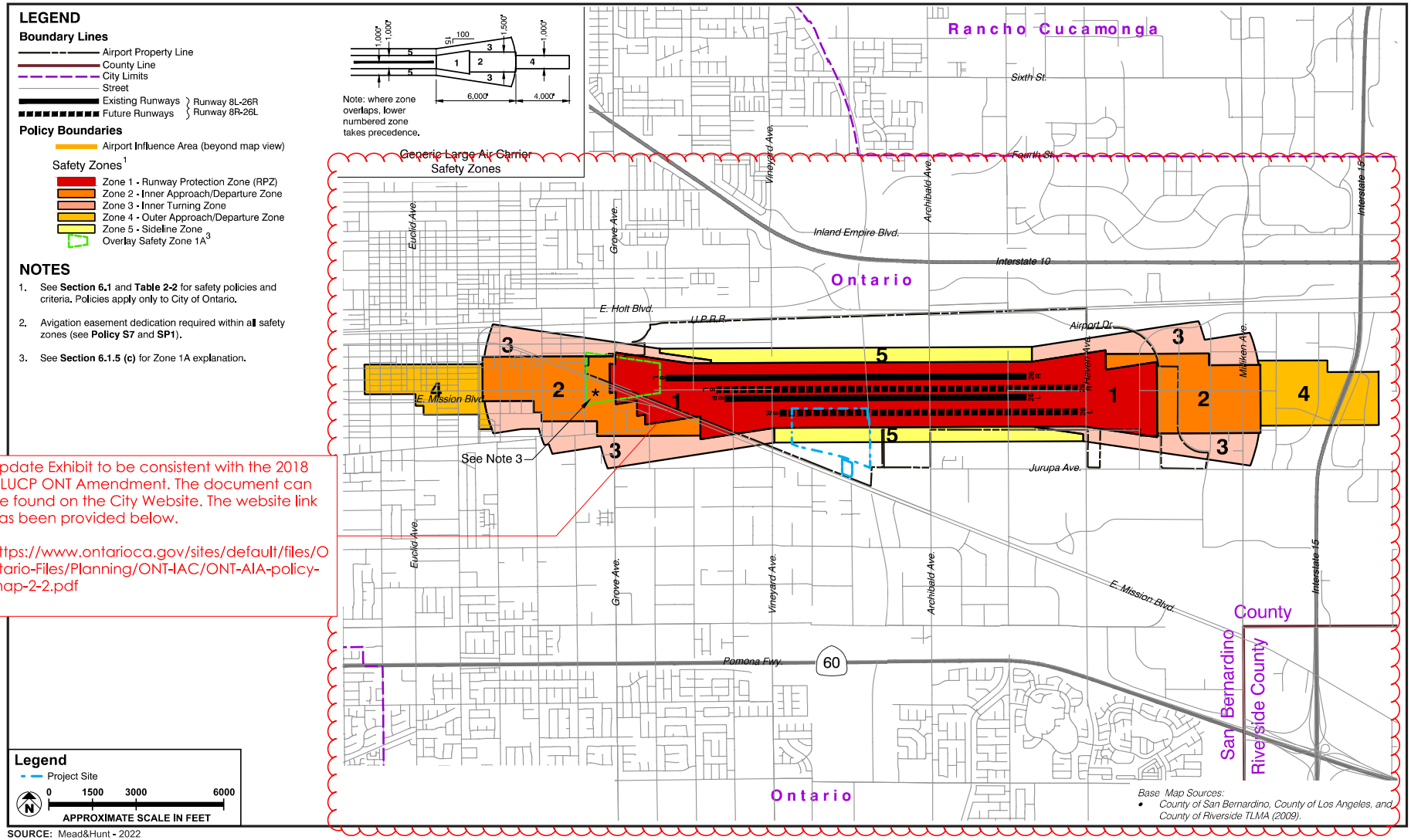
Once the proposed Project has been constructed, urban runoff could include a variety of contaminants that could impact water quality. Runoff from buildings and parking lots typically contain oils, grease, fuel, antifreeze, byproducts of combustion (such as lead, cadmium, nickel, and other metals), as well as suspended solids/sediment, fertilizers, herbicides, pesticides, and other pollutants associated with landscaping activities. Precipitation at the beginning of a storm season may result in an initial stormwater runoff (first flush) with high pollutant concentrations.

The Project has been designed to meet applicable LID requirements, which would include BMPs to treat stormwater. These BMPs would comply with standards as set forth by San Bernardino County, which comply with the CASQA. CASQA recommends three different types of stormwater quality treatment, as listed below in order of priority: infiltration, rainwater harvesting, and biotreatment.[47] The soil profile of the proposed Project site includes medium to very dense silty sand and sand with varying amounts of silt and gravel below approximately 30 feet.[48] Field tests resulted in high percolation rates of the sandy alluvial soils and deep groundwater, which concluded that infiltration onsite should be considered feasible. Based on methods used at nearby developments, underground stormwater storage has been identified as a typical practice for stormwater management (water quantity and water quality).

The drainage system would include a stormwater collection and conveyance system designed to collect and pre-treat stormwater in accordance with applicable LID standards in an underground

47 City of Ontario. *Stormwater Pollution Prevention for Industrial Businesses*.

48 Cotton, Shires, and Associates, Inc. *Geotechnical Investigation*.



Update Exhibit to be consistent with the 2018 ALUCP ONT Amendment. The document can be found on the City Website. The website link has been provided below.

https://www.ontarioca.gov/sites/default/files/Ontario-Files/Planning/ONT-IAC/ONT-AIA-policy-map-2-2.pdf

E-20

SOURCE: Mead&Hunt - 2022

FIGURE 5.8-2

Meridian Consultants

Ontario Airport Safety Zones

332-001-21

COMMENT LETTER E

City of Ontario
Rudy Zeledon, Community Development Assistant Director
April 27, 2023

Comment E-1:

The City of Ontario Planning Department appreciates the opportunity to comment on the above-mentioned project. The attached redlined comments recommend revisions to the Traffic Analysis (Synchro Analysis), Table 1-2, Section 3.0, Section 5.9, and Figures 5.8-2, 5.14-1, 5.14-2 and 5.14-3. If you should have any questions, please contact Lorena Mejia, Senior Planner at (909) 395-2428 (lmejia@ontarioca.gov or myself at (909)395-2422.

Response E-1:

This comment does not address the analysis of the potential environmental impacts of the Project. Specific comments are addressed in **Responses to Comments E-2** through **E-20**, below. No response to this comment is provided for this reason.

Comment E-2:

The following comments on the subject project are provided for the benefit of City Engineering and Planning staff and the applicant. These are not the conditions of approval which will be submitted under separate cover.

Traffic Analysis/BIR Comments:

1. The Synchro analysis for the Opening Year (2025) Plus Phase 1 Project-PM Peak Hour Scenario appears to have a typo for the thru lane volumes for the eastbound and westbound directions. The project volumes may have been left out of the analysis which would affect the delay calculation. See attached markup.

Response E-2:

The Traffic Study has been updated to correct the Synchro analysis for the Opening Year (2025) Plus Phase 1 Project PM Peak Hour Scenario. With this update, under Opening Year (2025) Plus Phase 1 Project Conditions, the number of intersections projected to operate at LOS F increases from 2 to 3. Two intersections were identified as operating at LOS F under Opening Year (2025) No Project Conditions. The addition of Project traffic is forecast to now add delay to the intersection of Archibald Avenue at Mission Boulevard under the Opening Year (2025) Plus Phase 1 Project Conditions scenario. Improvements, consisting of adding a dedicated left-turn pocket for the southbound approach with protected left-turn phasing for the northbound and southbound left-turn phases, will improve operating conditions at this intersection to better than pre-Project conditions. Additionally, Archibald Avenue is programmed in the Southern California

Association of Government (SCAG) Regional Transportation Program (RTP) to be widened to six lanes in each direction, which is greater than the improvements identified as needed, to improve this intersection to better than pre-Project conditions. The analysis of the Opening Year (2025) Plus Phase 1 Project Conditions LOS analysis in Section 5.12 in the Draft EIR has been updated in the Final EIR with this correction as shown in **Section 2.0: Additions and Corrections** in this Final EIR. The updated *Traffic Study* is provided in **Appendix 1.0** to this Final EIR. With the identified improvements, operating conditions at this intersection will be better than pre-Project conditions; this intersection would continue to operate at LOS E, consistent with the level of service standard in the City's General Plan, *The Ontario Plan*. The proposed Project would not conflict with any standard related to roadway facilities or services under Opening Year (2025) Conditions consistent with the conclusions in the Draft EIR.

Comment E-3:

There is no existing potable water main currently in Avion Street. The new 18-inch potable water main on Avion Street will be required to be designed and constructed between Vineyard Avenue and the point of connection east of the Cucamonga Creek Channel.

All existing water services to remain will be connected to the new water main.

Response E-3:

The language has been revised in the Final EIR to state there is no existing potable water main in Avion Street and that the proposed Project will connect to the new 18-inch water main on Avion Street that will be constructed between Vineyard Avenue and the point of connection east of the Cucamonga Channel as part of the OIAA East Avion Street Realignment project. (Please see **Section 2.0: Additions and Corrections** in this Final EIR.)

The construction of the new 18-inch water main and the realignment of Avion Street is part of the East Avion Street Realignment project (related Project F in the Draft EIR) and not a part of the proposed Project.

Comment E-4:

There is no existing sewer main currently in Avion Street. The design and construction of a public sewer main extending from the point of connection will be required.

Response E-4:

The language has been revised in the Final EIR to state there is no existing sewer main in Avion Street. The existing sewer main that the Project will connect to is located south of Avion Street behind existing OIAA maintenance facilities. This sewer main would not be disturbed during

construction of the proposed Project. Near the entry to the proposed truckyard, the sewer line would split into two separate service lines, one to the warehouse area of the cargo building and the other to the office wing. Based on the wastewater treatment capacity at RP-1, where wastewater generated at the Project site would be processed, the total amount of wastewater generated by the Project is estimated at 124,080 gallons per day (gpd; 0.12 million gallons per day [mgd]), which represents approximately 0.28 percent of the total daily wastewater capacity for RP-1.6 As discussed on page 5.14-24 in the Draft EIR, implementation of the proposed Project would not result in a significant increase in wastewater flow and would not require the construction of new or expanded water conveyance, treatment, or collection facilities, including any upsizing of the existing sewer line the Project will connect to, and impacts would be less than significant.

Comment E-5:

There is no existing water main in Avion Street. The design and construction of a new 18-inch water main is required in accordance City of Ontario Standards.

Response E-5:

See **Response to Comment E-3**.

Comment E-6:

Figure 3.17: Utility Systems Map was not included within the EIR.

Response E-6:

Figure 3.17: Utility Systems Map was included on page 3.0-30 in the Draft EIR.

Comment E-7:

There is no existing sewer main in Avion Street. The design and construction of a sewer main is required in accordance with City of Ontario Standards.

Response E-7:

See **Response to Comment E-4**.

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6 OIAA. *Ontario International Airport South Airport Cargo Center Project Draft Environmental Impact Report*. SCH Number 2021100226. Page 5.14-23. https://www.flyontario.com/our-neighbors/environment. Accessed May 2023.

Comment E-8:

This is a DRAFT Master Plan.

Response E-8:

The source for Figure 5.14-1 has been updated in the Final EIR to state "Draft OMUC 2020 Water Master Plan Update – 2020." (Please see **Section 2.0: Additions and Corrections** in this Final EIR.)

Comment E-9:

This was a DRAFT Master Plan.

Response E-9:

The source of Figure 5.14-2 has been updated in the Final EIR to state "Draft OMUC 2020 Water Master Plan Update – 2020." (Please see **Section 2.0: Additions and Corrections** in this Final EIR.)

Comment E-10:

Existing and Ultimate are two different plans; existing is what is currently installed and ultimate is what is planned for, which may include what is existing.

Response E-10:

This figure is for the ultimate sewer system. The title of Figure 5.14-2 has been updated in the Final EIR to "Ultimate Sewer System for the City." (Please see **Section 2.0: Additions and Corrections** in this Final EIR.)

Comment E-11:

2020 RWMP is a DRAFT Master Plan.

Response E-11:

The source of Figure 5.14-3 has been updated in the Final EIR to state "Draft OMUC 2020 Recycled Water Master Plan – 2020." (Please see **Section 2.0: Additions and Corrections** in this Final EIR.)

Comment E-12:

A PWQMP for this project is required by the City of Ontario for MS4 Permit Compliance if only the runoff from the proposed Project site enters Ontario streets and storm drain system. If the project runoff enters the County channel directly or via Avion Street (private street), a PWQMP

is not necessary. Please remove PWQMP from this text and other areas with similar context. Instead, the proposed project will need approval from the San Bernardino County Flood Control District (SBCFCD) for discharging into the Cucamonga Channel.

Response E-12:

The Project site would discharge to the storm drain planned as part of the East Avion Street Realignment project (related Project F in the Draft EIR). The Project site would not directly discharge into the Cucamonga Channel, nor would it increase the current pre-development flow rates. As Avion Street is a private street, language has been revised in the Final EIR to state that approval from San Bernardino County Flood Control District (SBCFCD) is needed, not a Preliminary Water Quality Management Plan (PWQMP). (Please see **Section 2.0: Additions and Corrections** in this Final EIR.)

Comment E-13:

A PWQMP for this project is required by the City of Ontario for MS4 Permit Compliance if only the runoff from the proposed Project site enters Ontario streets and storm drain system. If the project runoff enters the County channel directly or via Avion Street (private street), a PWQMP is not necessary. Please remove PWQMP from this text and other areas with similar context. Instead, the proposed project will need approval from the San Bernardino County Flood Control District (SBCFCD) for discharging into the Cucamonga Channel.

Response E-13:

See **Response to Comment E-12**, above.

Comment E-14:

The City requires a PWQMP for any new development and significant redevelopment project in Ontario that has stormwater runoff enters the City's streets and storm drain system.

Response E-14:

See **Response to Comment E-12**, above.

Comment E-15:

Please include an exhibit showing the four Drainage Areas described in this section and show the flow lines.

Response E-15:

Figure 5.9-2: Existing Drainage Areas has been added to the Final EIR. (Please see **Section 2.0: Additions and Corrections** in this Final EIR.)

Comment E-16:

Does runoff from Drainage Areas # 1 thru #4 enter the Cucamonga Channel directly, without entering any City's streets? If yes, please state this clearly in the environmental document. Since there is no discharge to Ontario MS4 system, a PWQMP is not required for the project. Instead, the proposed project will need approval from the San Bernardino County Flood Control District (SBCFCD) for discharging into the Cucamonga Channel.

Response E-16:

All stormwater from the Project site would be discharged to the drain to be installed as part of the East Avion Street Realignment project (related Project F in the Draft EIR). No stormwater from the Project site would flow directly into the Cucamonga Channel. As discussed in **Comment E-12** and **Response to Comment E-12**, the proposed Project runoff would enter the Cucamonga Channel via Avion Street, a private street. Instead of a PWQMP, the proposed Project would need approval from the SBCFCD. The language has been revised in the Final EIR to state that approval from SBCFCD is needed. (Please see **Section 2.0: Additions and Corrections** in this Final EIR).

Comment E-17:

The PWQMP and WQMP are used to address post construction stormwater quality issues. The City of Ontario requires all construction projects to submit a erosion control plan to address stormwater pollution and erosion control impacts associated with construction activities. Depending on the connection of the project drainage areas to the Cucamonga Channel, a PWQMP may not be required by the City. Please clarify this throughout the entire Environmental Impact Report.

Response E-17:

The language has been revised in the Final EIR to clarify that submittal of an erosion control plan is required prior to construction, and the PWQMP is required to address post-construction stormwater. All stormwater from the Project site would be discharged to the drain to be installed as part of the East Avion Street Realignment project (related Project F in the Draft EIR). No stormwater from the Project site would flow directly into the Cucamonga Channel. As discussed in **Comment E-12** and **Response to Comment E-12**, the proposed Project runoff would enter the Cucamonga Channel via Avion Street, a private street. Instead of a PWQMP, the proposed Project would need approval from the SBCFCD. (Please see **Section 2.0: Additions and Corrections** in this Final EIR.)

Comment E-18:

Incorrect use of the source. City of Ontario has a PWQMP template that is available for use by any development and significant redevelopment project. However, this PWQMP template provides the typical BMPs for Site Design/LID, Source Control and Treatment Control and does not select the above BMPs for the proposed project.

Response E-18:

The comment states the PWQMP template identifies typical best management practices (BMPs) that may be incorporated into the water quality treatment system for an individual development project, but does not determine which BMPs should be used for an individual development project.

The BMPs listed in Table 5.9-3 in the Draft EIR are identified in the Preliminary Water Quality Management Plan prepared for the Project contained in Appendix 5.9-2 of the Draft EIR. Table 5.9-3 has been updated in the Final EIR to reference Appendix 5.9-2 of the Draft EIR as the source. (Please see **Section 2.0: Additions and Corrections** in this Final EIR.)

Comment E-19:

The PWQMP will be used as a reference for the approval of the project WQMP (if any) and will not be used to address water quality impacts associated with construction activities. The erosion control plan will be used to address stormwater pollution and erosion control impacts associated with construction activities.

Response E-19:

This language has been revised in the Final EIR to clarify that submittal of an erosion control plan is required prior to construction and the PWQMP is required to address post-construction stormwater. (Please see **Section 2.0: Additions and Corrections** in this Final EIR.)

Comment E-20:

Update Exhibit to be consistent with the 2018 ALUCP ONT Amendment. The document can be found on the City Website. The website link has been provided below.

https://www.ontarioca.gov/sites/default/files/Ontario-Files/Planning/ONT-IAC/ONT-AIA-policymap-2-2.pdf.

Response E-20:

Figure 5.8-2 has been updated in the Final EIR to be consistent with the Ontario International Airport 2018 Airport Land Use Compatibility Plan (ALUCP) Amendment. (Please see **Section 2.0: Additions and Corrections** in this Final EIR.)

CITY of CHINO

April 27, 2023

Kevin Keith, Re: Draft EIR South Airport Cargo Center Comment
OIAA Administrative Offices
1923 East Avion Street
Ontario, CA 91761
kkeith@flyontario.com

Re: **Notice of Availability of a Draft Environmental Impact Report (EIR): Ontario International Airport South Airport Cargo Center Project**

Dear Mr. Keith:

This letter is in response to the Notice of Availability of a draft EIR for the Ontario International Airport South Airport Cargo Center Project, made available on March 13, 2023. The City previously provided a letter to the Ontario International Airport Authority (OIAA) in November of 2021 (see attached) related to the proposed Airport Cargo Center Project (Project). Some of the items outlined in that letter have not been clearly identified in the EIR prepared. The City's comments are outlined below: F-1

Planning

Flight Path

1) As noted in the November 2021 letter, there are concerns about the possible changes to flight patterns as it relates to increased airport operations due to the Project that could result in sleep interference for Chino residents. As a result, a sleep interference study was previously requested to understand the potential increase in noise levels on residential units in the area of the airport. Has that study been completed and if so, has it been incorporated into the EIR that would include mitigation measures for impacted residents within the flight paths? What are the mitigation measures identified? Please provide a copy of this study and detail the mitigation measures. F-2 F-3

2) How are flight patterns determined for this cargo facility and how are changes to flight patterns determined due to weather, runway capacity, construction/repairs? How are the impacts of the changes studied, and how are the impacted residents informed of these changes? F-4

Noise

3) An Aircraft Noise Assessment (Appendix 5.10-1) and Roadway Noise Worksheets (Appendix 5.10-2) have been provided. How specifically have these studies discussed the impacts to the residents of Chino? In addition, the cargo facility will likely be obtaining cargo from logistics facilities in the region F-5 F-6

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surrounding the airport, not only from the City of Ontario. As indicated in the November 2021 letter, any noise study provided should include impacts to residents, schools, healthcare facilities, and other sensitive uses in surrounding agencies. In addition to the noise impacts from increased airport operations from cargo planes that need to be mitigated. How will noise be mitigated from increased trucking that could have an impact on the residents and businesses in the City of Chino?

F-6 cont'd

We do not believe that aircraft operation noise is adequately addressed in Section 5.10 as the requested studies have not been conducted and the proposed mitigation measures are inadequate. While we appreciate that the OIAA has a Rules and Regulations Manual for ONT with voluntary noise mitigation operating procedures and restrictions, the reality is that the OIAA does little more than "encourage the airlines operating at ONT to use quieter aircraft, to re-engine aircraft to meet the most restrictive aircraft engine noise standards established by the FAA, and to retire old/noisier aircraft" (Appendix 5.10-1, p. 3, emphasis added). Resident complaints about noise and testimony to the OIAA are not responded to and there are no effective avenues for relief provided to the affected residents. Despite claims that "Contra Flow" minimizes noise exposure during the night and that engine run-ups are prohibited, when residents reach out because planes are flying overhead at low altitudes, are regularly departing to the east during nighttime, and revving their engines, they are ignored, even when they provide recordings of the run-ups and flight information.

F-7

For this reason, we feel it is imperative that an active, ongoing Noise Roundtable that includes members of the public and representatives from local jurisdictions and stakeholder groups, including Chino, be established.

F-8

As noted in Appendix 5.10-1, page 7, "There are also a few unmitigated residences located within the western extent of the area in which aircraft noise would increase with the Proposed Project." There are more than just "a few" residences that will be impacted by the airplane noise created by this Project. Many of these residences are within the City of Chino and should be provided with a noise mitigation program.

F-9

Air Quality

4) An Air Quality Technical Report (Appendix 5.02-1) has been provided. How specifically has this study discussed the impacts to the residents of Chino as it relates to air quality? As indicated in the November 2021 letter, any air quality study provided should include impacts to the climate from CO2 and methane emissions. Specifically, it should focus on cargo aircraft that utilize flight paths that go over the City of Chino, and also vehicles that obtain freight from logistics facilities and/or ship freight to logistics facilities in the area surrounding the airport, not just from the City of Ontario. How will air quality be mitigated from increased trucking and cargo aircraft that could have an impact on the residents and businesses in the City of Chino?

F-10

Traffic / Transportation

5) As mentioned, the proposed cargo facility at the Ontario Airport is likely to obtain and/or ship cargo freight from local logistics buildings in the City of Ontario and surrounding communities, including the City of Chino. A Transportation Study (Appendix 5.12) was provided. How specifically has this study addressed the traffic and infrastructure impacts to the roadways within the City of Chino being utilized to collect and deliver freight to and from the proposed cargo facility at the Ontario Airport?

F-11

CITY of CHINO

November 15, 2021

Ontario International Airport Authority
c/o Nicole Walker, Environmental Planning Manager
1923 East Avion Street
Ontario, CA 91761
nwalker@flyontario.com

RE: City of Chino Comments on Proposed South Airport Cargo Center Project (Project)

Dear Ms. Walker:

Please find the following in response to Ontario International Airport Authority's (OIAA) request for comments from responsible agencies on the proposed South Airport Cargo Center Project (Project). These comments address the scope and content of the Notice of Preparation (NOP) of an Environmental Impact Report (EIR) relevant to potential impacts on the City of Chino (City) from the proposed Project.

The City understands that the OIAA is the Lead Agency and will prepare an EIR in compliance with the California Environmental Quality Act (CEQA). Given the scope and potential impacts of the Project and proposed actions, we stress the applicability of the National Environmental Policy Act (NEPA), which would also prepare an Environmental Impact Statement (EIS) to include a noise study (per 14CFR PART 150) of ground, air, and land use for future environmental impacts to the Project area and surrounding communities. This study would also facilitate federal programs to mitigate noise, water, and air quality issues while utilizing a professional third-party expert to conduct the needed analyses per Federal Aviation Administration (FAA) Order 1050.1.

F-12

During the November 10, 2021 Scoping Meeting, Project Consultants and OIAA staff stressed that the proposed Project is in preliminary stages and discussions with FAA are just beginning. Based on the information provided to date, the City believes the EIR must evaluate both the long term and short-term, as well as cumulative environmental impacts of the Project, with emphasis placed on noise, air quality, traffic and safety. Specific requirements include:

- Comprehensive computer modeling using the FAA standard Aviation Environmental Design Tool (AEDT), a software system that dynamically models aircraft performance in space and time to produce fuel burn, air emissions, and noise. The AEDT must evaluate various project alternatives and a no-project alternative to enable quantitative assessment of the impacts.

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- A sleep interference assessment is required to determine the degree of awakenings and other effects upon the residential communities from the increased aircraft operations.
- Revision of air traffic patterns for arrivals and departures to limit the low-flying aircraft currently awakening neighbors near the airport. The sleep interference study must assess the effects of this mitigation program.
- With the increased noise impact on surrounding communities, criteria must be developed for noise mitigation of residences, schools, and health care facilities. One likely mitigation plan is a sound insulation program (SIP) like that already affected for homes near Ontario International Airport (ONT).
- A separate noise study is also necessary to determine the noise impact of additional car and heavy truck traffic generated by the proposed Project.
- A study is required for the traffic effects on surrounding communities from increased surface traffic, for automobile and heavy truck transport to and from the proposed cargo facilities.
- The specific effects on climate change, due to emission of CO2 and methane from aircraft taxiing, takeoffs and landings, surface vehicular traffic, and fuel storage must be quantified.
- A crash hazard potential study is required to determine the potential for aircraft crashes in the surrounding communities and the possible effects on insurance rates for homeowners.
- Mitigation measures must be evaluated and assessed for all environmental effects.

Please address and/or notify our contact person for any/or all information or notices relative to your project:

Warren Morelion, AICP
City Planner
City of Chino
13220 Central Avenue
Chino, CA 91710

We urge the Federal Aviation Administration to prepare an EIS to comply with obligations under NEPA. The EIS should contain comprehensive analyses of alternatives and mitigation measures for the significant impacts of the proposed actions. Fulfilling the FAA's obligation under NEPA to fully evaluate the potential to significantly affect the quality of the human environment will also provide an extended opportunity to work with the local community to jointly develop mitigation measures to improve the Project and reduce its effects on the community.

The City appreciates this opportunity to comment on the proposed Project and looks forward to working with OIAA and the FAA toward a legally supportable environmental review and successful implementation of an environmentally compliant and properly mitigated Ontario International Airport South Airport Cargo Center Project.

F-12 cont'd

We look forward to working with you to ensure that mitigation, avoidance, and minimization measures that protect our residents are implemented as a condition of approval of EIR and EIS approval.

F-12 cont'd

Sincerely,

Eunice M. Ulloa
Mayor

cc: Congresswoman Norma Torres
Alan Wapner, President, OIAA
Ronald Loveridge, Vice President, OIAA
Jim Bowman, Secretary, OIAA
Curt Hagman, Commissioner, OIAA
Julia Gouw, Commissioner, OIAA
Scott Ochoa, City Manager, City of Ontario

It is our understanding that the OIAA has initiated the preparation of a separate Environmental Assessment (EA) by the Federal Aviation Administration (FAA) in compliance with the National Environmental Policy Act (NEPA) to identify and consider the potential environmental impacts associated with the proposed Project. Given the potential impacts of the Project on Chino residents, an Environmental Impact Statement (EIS) that includes a noise study (per 14CFR PART 150) of ground, air, and land use for future environmental impacts to the Project area and surrounding communities is vital. This study would also facilitate federal programs to mitigate noise, water, and air quality issues while utilizing a professional third-party expert to conduct the needed analyses per Federal Aviation Administration (FAA) Order 1050.1 – something which our residents, who will bear the burdens of the Project by being subjected to sleep disturbance, adverse health effects, diminished quality of life, and safety hazards, deserve.

F-13

FAA review should include comprehensive computer modeling using the FAA standard Aviation Environmental Design Tool (AEDT), a software system that dynamically models aircraft performance in space and time to produce fuel burn, air emissions, and noise. The AEDT must evaluate various Project alternatives and a no-Project alternative to enable a quantitative assessment of the impacts. Fulfilling the FAA's obligation under NEPA to fully evaluate the potential to significantly affect the quality of the human environment will also provide an extended opportunity to work with the local community to jointly develop mitigation measures to improve the Project and reduce its effects on the community.

The City appreciates this opportunity to comment on the EIR but notes that several previously requested studies and mitigation measures that are necessary to ensure the successful implementation of an environmentally compliant and properly mitigated Ontario International Airport South Airport Cargo Center Project are outstanding. We request that these studies and mitigation measures, including the evaluation and assessment of these measures for environmental effects, be provided.

F-14

We remain committed to working with you to ensure that mitigation, avoidance, minimization, and communication measures that protect our residents are implemented as a condition of approval of the EIR and EIS for this Project.

If you have any questions, please contact Principal Planner Michael Hitz by email at mhitz@cityofchino.org or at 909-334-3448.

Sincerely,

Jackie Melendez
Assistant City Manager

Attachment: City of Chino Comments on Proposed South Airport Cargo Center Project, November 15, 2021

cc: Congresswoman Norma Torres
Janice Chan, Acting Manager, Environmental Review Branch, FAA (chan.janice@epa.gov)
Nick Liguori, Director of Development Services, City of Chino

COMMENT LETTER F

City of Chino
Jackie Melendez, Assistant City Manager
April 27, 2023

Comment F-1:

This letter is in response to the Notice of Availability of a draft EIR for the Ontario International Airport South Airport Cargo Center Project, made available on March 13, 2023. The City previously provided a letter to the Ontario International Airport Authority (OIAA) in November of 2021 (see attached) related to the proposed Airport Cargo Center Project (Project). Some of the items outlined in that letter have not been clearly identified in the EIR prepared. The City's comments are outlined below:

Response F-1:

This comment serves as an introduction to comments that follow and does not address the analysis of the potential environmental impacts of the proposed Project. Therefore, no further response is required for this reason.

Comment F-2:

1) As noted in the November 2021 letter, there are concerns about the possible changes to flight patterns as it relates to increased airport operations due to the Project that could result in sleep interference for Chino residents. As a result, a sleep interference study was previously requested to understand the potential increase in noise levels on residential units in the area of the airport. Has that study been completed and if so, has it been incorporated into the EIR that would include mitigation measures for impacted residents within the flight paths?

Response F-2:

Flight tracks for Ontario Airport are shown in **Figure 3: Ontario Airport Flight Tracks in Surrounding Area**. As shown in this figure, there are existing flight tracks that travel over the City of Chino. No changes in the existing flight tracks or patterns would occur as a result of the proposed Project. These existing flight tracks would not change as a result of the proposed Project. Flights associated with the proposed Project would use these existing flight tracks.

The proposed Project would add approximately 44 operations per day for Ontario Airport in 2025 and approximately 66 operations per day in 2029. This increase in the number of daily flights would represent approximately 12 percent of 360 total daily flight operations in 2025 and 16 percent of the total 405 total daily flight operations in 2029 identified in Table 5.10-8, Aircraft Operations – Baseline Condition and Proposed Project, in Section 5.10: Noise of the Draft EIR.

The Aircraft Noise Modeling in the Aircraft Noise Assessment report provided in Appendix 5.10-1 of the Draft EIR and discussed in Section 5.10 of the Draft EIR developed baseline and future years (2025 and 2029) Community Noise Equivalent Level (CNEL) contours for 65, 70, and 75 dBA noise levels. CNEL is the average sound level over a 24 hour period, with a penalty of 5 dB added for noise events during the evening hours of 7:00 PM to 10:00 PM, and a penalty of 10 dB added for noise events during the nighttime hours of 10:00 PM to 7:00 AM. In other words, the CNEL is calculated from the Sound Exposure Level (SEL) of individual aircraft operations occurring over a 24-hour period, with 10 dB added to the SEL values for nighttime operations.

The years 2025 and 2029 aircraft CNEL 65+ dBA noise contours with the proposed Project and the baseline condition for the years 2025 and 2029 are depicted on Figure 5.10-5 and Figure 5.10-6, respectively, of the Draft EIR. As shown on these figures, no areas within the City of Chino are presently, or are forecast, to be located within the 65 CNEL, which is the level associated with significant noise levels for noise-sensitive uses.

With regard to sleep disturbance from noise, research includes widely varying observations because (1) sleep can be disturbed without awakening; (2) the deeper the sleep the more noise it takes to cause disturbance; and (3) the tendency to awaken increases with age, and other factors.[7]

For the baseline conditions as defined and analyzed in the Draft EIR, 74 of the 290 existing daily number of flights occur during nighttime with 18 of these flights using flight tracks that pass over the City of Chino.

In 2025, without the Project, the total number of daily flights is forecast to increase to 316 flights with 81 of these flights occurring during nighttime, and 18 of these flights using flight tracks that pass over the City of Chino. In 2025, with the additional flights associated with the Project, the total number of daily flights is forecast to increase to 360 flights with 104 of these flights occurring during nighttime, and 19 of these flights using flight tracks that pass over the City of Chino.

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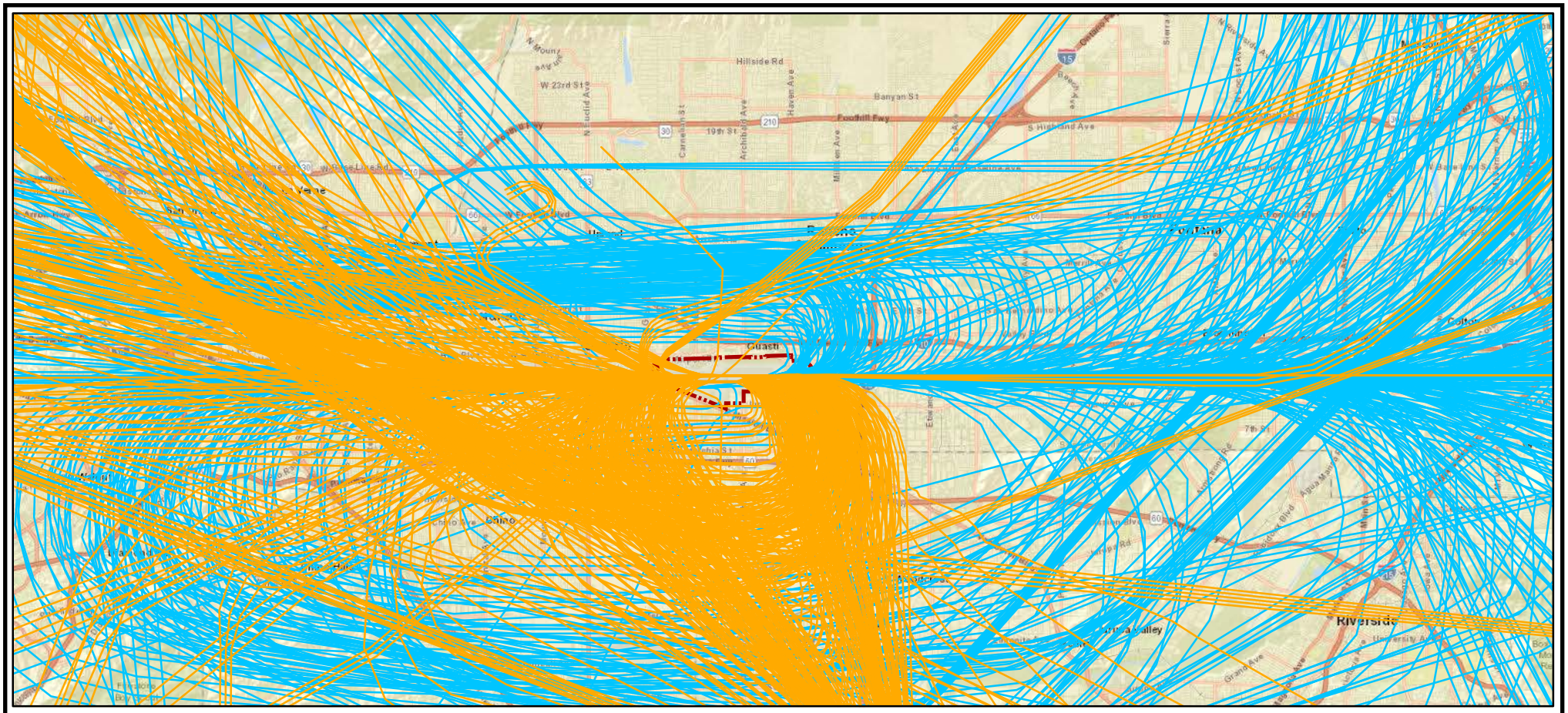
7 Federal Aviation Administration. *ILHS-HAA Environmental Assessment*. Appendix E: Basics of Noise. April 2023. https://www.faa.gov/media/28146. Accessed May 2023.



SOURCE: Ontario International Airport - 2022

FIGURE **3**

Meridian Consultants

Flight Tracks (5-19-2023)

332-001-21

In 2029, without the Project, the total number of daily flights is forecast to increase to 339 flights, with 85 of these flights occurring during nighttime, and 19 of these flights using flight tracks that pass over the City of Chino. In 2029, with the additional flights associated with the Project, the total number of daily flights is forecast to increase to 405 flights, with 108 of these flights occurring during nighttime, and 20 of these flights using flight tracks that pass over the City of Chino.

Of the additional flights associated with the Project, only 1 additional flight using the flight tracks that pass over the City of Chino would occur during nighttime in years 2025 and 2029 compared to without Project conditions. Compared to baseline conditions, an additional 1 to 2 flights over the City of Chino, and utilizing only the already existing flight tracks, during the nighttime is predicted to occur whether the proposed Project is implemented or not. Based on this negligible change in nighttime operations and because the City of Chino is located well outside of the CNEL 65 dBA noise contour, preparation of a sleep interference study is not warranted.

Comment F-3:

What are the mitigation measures identified? Please provide a copy of this study and detail the mitigation measures.

Response F-3:

As discussed in **Response to Comment F-2**, above, preparation of a sleep interference study is not warranted. The Project will not result in any substantial change in nighttime noise conditions in the City of Chino and, for this reason, no additional mitigation measures are required.

Comment F-4:

2) How are flight patterns determined for this cargo facility and how are changes to flight patterns determined due to weather, runway capacity, construction/repairs? How are the impacts of the changes studied, and how are the impacted residents informed of these changes?

Response F-4:

The OIAA has no authority over air traffic flight patterns and/or routes, altitudes of aircraft in the air, or time of operation; however, carriers serving ONT are required to comply with Section 3, Aircraft Operations, and Section 5, Aircraft Noise Mitigation Operating Procedures and Restrictions, of the OIAA Rules and Regulations. The Federal Aviation Administration (FAA) is solely responsible for the control of aircraft operations, including taxiing of aircraft within airfield movement areas. Notably, the proposed Project would not result in any changes to existing flight patterns at ONT.

While OIAA has identified best management practices to limit potential effects of operational noise, OIAA regulations do not supersede the authority of the FAA or pilots in command of aircraft to conduct safe aircraft operations. Additionally, OIAA has no control over equipment operated by carriers serving ONT, although all aircraft operating under the purview of the FAA must meet the FAA's Airworthiness Certification standards.

OIAA Noise Complaint Policy and Platforms

OIAA maintains a noise hotline for community members to register complaints, and also offers an online form that can be filled out on the ONT website. OIAA's internal policy for responding to operational noise complaints is to do so via email or telephone. OIAA staff strive to respond to community members within a reasonable timeframe following reported noise events to discuss questions or concerns about general or specific aircraft operations.

Contra-flow is the OIAA's preferred flight procedure to reduce noise over nearby residential areas during nighttime and early morning hours (see page 3 of the *Aircraft Noise Assessment* [Appendix 5.10-1 to the Draft EIR]).[8] When weather conditions allow, aircraft operating between the hours of 10 PM and 7 AM will take off to the east and arrive/land from the west. Most air carriers employ the contra-flow procedure during the established times; however, atmospheric conditions (wind and low cloud ceilings) or aircraft operational requirements intermittently require deviation from contra-flow operations, which may result in brief noise events over residential areas. All Airport projects that would potentially cause a change to day-evening-night average noise levels from aircraft operations, including the South Airport Cargo Center Project, are analyzed for noise impacts according to State and federal regulations.

Comment F-5:

3) An Aircraft Noise Assessment (Appendix 5.10-1) and Roadway Noise Worksheets (Appendix 5.10-2) have been provided. How specifically have these studies discussed the impacts to the residents of Chino?

Response F-5:

Appendix 5.10-1 to the Draft EIR documents the methodologies used and presents the findings of the aircraft noise assessment completed to evaluate the potential changes in noise conditions that would result from the additional aircraft operations associated with the proposed Project.

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8 From 10 PM to 7 AM, when wind and weather conditions permit, aircraft depart to the east and land to the west. During these nighttime hours, this "Contra Flow" minimizes the level of aircraft noise exposure to the area west of ONT.

Aircraft noise levels were derived using Version 3d of the Federal Aviation Administration's (FAA's) Aviation Environmental Design Tool (AEDT), the current version of the computer model available when the analysis was completed. Baseline, 2025, and 2029 Community Noise Equivalent Level (CNEL) contours at 65, 70, and 75 decibels (dB) were developed using FAA's AEDT. The Aircraft Noise Assessment then compared the proposed Project CNEL contours to the Baseline Conditions and future (2025 and 2029) without the proposed Project contours to determine if any noise-sensitive land uses would be significantly impacted by the proposed Project (as defined by *FAA Order 1050.1E* and Appendix G of the *CEQA Guidelines*).

To determine the significance of the impact of a proposed project, CEQA and the *CEQA Guidelines* require that future conditions with a proposed Project be compared to existing (i.e., Baseline) conditions. See **Response to Comment F-6**, below, for the number of housing units and persons identified within the CNEL 65–69, 70–74, and 75+ dB(A) contours in the *Aircraft Noise Assessment* and the Draft EIR. The Draft EIR identifies areas of significant aircraft noise exposure on Figure 5.10-5: 2025 Proposed Project vs. Baseline Condition Noise Contours and Figure 5.10-6: 2029 Proposed Project vs. Baseline Condition Noise Contours. All identified areas are located east and west of the Airport within the City of Ontario. The *Aircraft Noise Assessment* did not identify significant noise impacts to the residents of the City of Chino. The distance between the closest part of the CNEL 65 dBA contour to the City of Chino is approximately 1.8 miles.[9] At this distance, residents of the City of Chino would not be significantly impacted by aircraft noise of the proposed Project.

Appendix 5.10-2 of the Draft EIR includes for the Roadway Noise Worksheets. The Roadway Noise Worksheets include an analysis of the traffic noise levels on local roadways for Existing, Opening Year (2025) without Project Phase 1, Opening Year (2025) with Project Phase 1, Opening Year (2029) without Project Phase 2, Opening Year (2029) with Project Phase 2 (full buildout), Future Year (2040) without Project, and Future Year (2024) with Project. The traffic noise levels on local roadways in the surrounding areas were calculated to quantify the 24-hour CNEL noise levels using information provided in the *Traffic Study* (Appendix 5.12-1 to the Draft EIR). A total of 29 roadway segments analyzed in the *Traffic Study* and were the subject of the roadway noise analysis to determine the potential effect of the proposed Project's motor vehicle travel on community noise level. The *Traffic Study* was conducted in consultation with the City of Ontario. Consistent with City of Ontario requirements, intersections of roadways classified as collectors or higher, which the proposed Project is anticipated to add 50 or more peak hour trips

9 Section 5102 of Title 21 establishes CNEL 65 dB(A), as the Airport Noise Standard for an acceptable level of aircraft noise for persons living in the vicinity of an airport.

to, were chosen as study intersections. None of these intersections are located within the City of Chino. As identified in Tables 5.10-10 and 5.10-11 in the Draft EIR, increased truck trips generated by the proposed Project would not cause a significant impact on any roadway. Additionally, as shown in Figures 3 through 6 of the *Traffic Study*, the distribution of truck trips would occur within the City of Ontario and utilize streets within the City of Ontario (Mission Boulevard, North Euclid Avenue, Grove Avenue, South Vineyard Avenue, South Archibald Avenue, Jurupa Street, and South Haven Avenue) to access the nearby freeways. The proposed Project truck trip distribution to the freeways would not occur on streets within the City of Chino, which is located approximately 3.2 miles southwest of the Project site. As no large increase in truck trips in the City of Chino was anticipated, intersections within the City of Chino were not evaluated.

Comment F-6:

In addition, the cargo facility will likely be obtaining cargo from logistics facilities in the region surrounding the airport, not only from the City of Ontario. As indicated in the November 2021 letter, any noise study provided should include impacts to residents, schools, healthcare facilities, and other sensitive uses in surrounding agencies. In addition to the noise impacts from increased airport operations from cargo planes that need to be mitigated.

Response F-6:

This comment assumes there are significant impacts related to roadway (trucking) and aviation (cargo planes) noise increases in the City of Chino that will result from the proposed Project. See **Response to Comment F-**7, below, regarding increased trucking and roadway noise. Potentially significant noise impacts to sensitive receptors were analyzed in the *Aircraft Noise Assessment* (Appendix 5.10-1 to the Draft EIR) and Section 5.10 of the Draft EIR. Sensitive receptors are defined on Page 5.10-6 of the Draft EIR as "land uses considered to be noise sensitive, including residences, schools, hospitals, libraries, and parks. Residential land uses are considered especially noise sensitive because (1) considerable time is spent by individuals at home, (2) significant activities occur outdoors, and (3) sleep disturbance is most likely to occur in a residential area. The Federal Highway Administration (FHWA) considers uses where people normally sleep, such as residences, hotels, and motels, noise-sensitive land uses."

The Aircraft Noise Modeling in the *Aircraft Noise Assessment* and discussed in Section 5.10 of the Draft EIR was completed to develop existing and future year Community Noise Equivalent Level (CNEL) contours for 65, 70, and 75 dBA. The baseline and future (2025 and 2029) proposed Project CNEL contours were compared to the Baseline contours to determine if any noise-sensitive land uses would be significantly impacted by the proposed Project. As discussed in

Section 5.10 of the Draft EIR, significant off-site noise impacts would occur if proposed Project-related operational activities result in increased noise levels that trigger any of the following:

- An increase of 5.0 dBA CNEL or greater at a noise-sensitive use and the resulting level remains within the "clearly acceptable" and "normally acceptable" land use compatibility classification from Figure 5.10-3 in the Draft EIR; or
- An increase of 3.0 dBA CNEL or greater at a noise-sensitive use and the resulting level falls within the "normally unacceptable" or "clearly unacceptable" land use compatibility classification from Figure 5.10-3; or
- An increase resulting in a change from a "clearly acceptable" or "normally acceptable" land use compatibility classification to a "normally unacceptable" or "clearly unacceptable" land use compatibility classification.[10]

Based on the Noise Criteria in Figure 5.10-3 in the Draft EIR, single-family residential uses, schools, family daycare homes, libraries, and other noise-sensitive uses are considered incompatible if exterior noise level exceeds 65 dB CNEL. Accordingly, significant noise impacts were identified based on changes to the 65 CNEL noise contours for the Airport.

The years 2025 and 2029 aircraft CNEL 65+ dBA noise contours with the proposed Project and the baseline condition for the years 2025 and 2029 are depicted on Figure 5.10-5 and Figure 5.10-6, respectively, in the Draft EIR. As shown in these figures, no areas within the City of Chino would be located within the 65 dBA CNEL noise contour and the proposed Project would not create a significant noise impact with the City of Chino. Section 5.10.2.3: Existing Conditions in the Draft EIR identifies noise-sensitive land uses closest to the Airport (e.g., the closest residences, school, and hospital) within the 65 dB CNEL noise contour and the land uses that would be impacted by the proposed Project are identified in Section 5.10.3.3: Project Impacts in the Draft EIR. Table 5 on page 8 of the *Aircraft Noise Assessment* provides the estimated number of housing units and persons within the CNEL 65–69, 70–74, and 75+ dB(A) contours. The *Aircraft Noise Assessment* states the following:

> *"In the year 2025 with the Proposed Project, it is estimated that there would be four additional residences for which OIAA has no record of the residences being addressed through the Quiet Home Program and 18 persons within the CNEL 65 - 69 dB(A) contour and no housing units or*

10 OIAA. *Ontario International Airport South Airport Cargo Center Project Draft Environmental Impact Report*. SCH Number 2021100226. Page 5.10-27. https://www.flyontario.com/our-neighbors/environment. Accessed May 2023.

> *persons within the CNEL 70+ dB(A) contour when compared to the Baseline Condition. By the year 2029, it is estimated that there would be 15 additional housing units for which the OIAA has no records of the residences being addressed through the Quiet Home Program and 63 additional persons within the CNEL 65 - 69 dB(A) contour and no housing units or persons within the CNEL 70+ dB(A) contour."* [11,12]

As stated in the Draft EIR on page 5.10-46 and within the notes in Table 5 of the *Aircraft Noise Assessment*, some of the additional residences located within the proposed Project 65–69 CNEL noise contour are subject to avigation easements allowing overflight by aircraft. When these avigation easements are considered, the number of additional housing units in 2025 is reduced to 3 units with the affected population reduced to 14, and in 2029 the number of housing units affected is reduced to 12 units with the affected population reduced to 51. Because unmitigated residences would be exposed to aircraft noise that would be considered significant, the Baseline Condition and Proposed Project condition would result in a potentially significant impact. Implementation of Mitigation Measure (MM) NOI-1 would define a residential noise program for housing units affected by aviation noise generated by the Project that would reduce impacts related to aircraft noise to less-than-significant levels.[13] Under all scenarios, no housing units in the City of Chino would be significantly impacted by increases in noise that would result from the Project.

Comment F-7:

How will noise be mitigated from increased trucking that could have an impact on the residents and businesses in the City of Chino?

Response F-7:

The nearest boundary of the City of Chino (the northeast section of the City) is about 3.2 miles away from the proposed Project site. Figures 3 through 6 of the *Traffic Study* (Appendix 5.12 of

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11 OIAA. *Ontario International Airport South Airport Cargo Center Project Draft Environmental Impact Report*.

12 Page 5.10-46 in the Draft EIR states, "By the year 2029, it is estimated that there would be 12 additional unmitigated housing units and 43 additional persons within the CNEL 65-69 dBA contour." This is a typo and has been corrected to 15 additional housing units for which the OIAA has no records of the residences being addressed through the Quiet Home Program and 63 additional persons within the CNEL 65–69 dB(A) contour consistent with the *Aircraft Noise Assessment*. Please see **Section 2.0: Additions and Corrections** in this Final EIR.

13 OIAA. *Ontario International Airport South Airport Cargo Center Project Draft Environmental Impact Report*.

the Draft EIR) show the AM trip distribution (the highest trip-generating period), the proposed Project trip distribution for employees (non-truck trips), the truck assignments for Phase 1, and the truck assignments for Phase 2. As shown in Figure 4 of the *Traffic Study*, the majority of trips generated by the proposed Project will use Mission Boulevard, North Euclid Avenue, Grove Avenue, South Vineyard Avenue, South Archibald Avenue, Jurupa Street, and South Haven Avenue to access the nearby freeways. No large increase in truck trips in the City of Chino will result from implementation of the proposed Project. Furthermore, as identified in Tables 5.10-10 and 5.10-11 in the Draft EIR, the additional truck trips generated by the proposed Project will not result in a substantial increase in noise on any roadway. Therefore, no significant noise impacts to residents and businesses within the City of Chino would occur from the increase in truck trips due to the proposed Project.

Comment F-8:

We do not believe that aircraft operation noise is adequately addressed in Section 5.10 as the requested studies have not been conducted and the proposed mitigation measures are inadequate.

Response F-8:

This comment assumes there are significant noise impacts from aircraft operations in the City of Chino that would occur from the additional flights at Ontario Airport from the proposed Project. The commenter states that additional noise studies and mitigation measures are necessary for the proposed Project. Please see **Response to Comment F-3** regarding why preparation of these additional studies to determine the potential effects of the proposed Project on the City of Chino is not warranted or necessary. As discussed, an *Aircraft Noise Assessment* (Appendix 5.10-1 of the Draft EIR), Roadway Noise Worksheets (Appendix 5.10-2 of the Draft EIR), Construction Noise Worksheets (Appendix 5.10-3 of the Draft EIR), and Construction Vibration Worksheets (Appendix 5.10-4 of the Draft EIR) were completed, fully addressing noise impacts and necessary mitigation measures for the proposed Project. All studies needed to identify the potential for noise impacts from the proposed Project were completed and included in the Draft EIR.

Further, the comment suggests that the proposed mitigation is not adequate to mitigate noise impacts for the proposed Project. The comment does not specify or elaborate on why the proposed mitigation measures are not adequate and does not propose additional suggested mitigation measures. As discussed in Section 5.10 in the Draft EIR, construction noise levels would not exceed 85 dBA (Leq-1hour) at the nearest noise-sensitive receptors to the Project site. Moreover, Table 5.10-12 shows that the forecasted vibration levels due to on-site construction activities would not exceed the strictest building damage significance threshold of 0.12 PPV ips

for all sensitive sites surrounding the proposed Project area during construction. As such, construction impacts would be less than significant.

As shown in Tables 5.10-10 and 5.10-11 in the Draft EIR, roadway noise levels during Phase 1 and Phase 2 conditions would be less than significant. Table 5.10-14 identifies that for the Baseline Condition and Project condition, some residences located in close proximity to the Airport would be impacted by the increase in noise from the additional flights associated with the proposed Project. However, none of these residences are located within the City of Chino. Additionally, Table 5.10-17 shows that for the proposed Project and No Action Alternative condition, additional residences would be exposed to aircraft noise levels that would be considered potentially significant. Implementation of the Residential Sound Insulation Program (RSIP) in MM NOI-1 would reduce impacts from the proposed Project to less than significant.

The proposed Project would contribute to temporary cumulative noise impacts during construction of the Runway 8R-26L runway rehabilitation/reconstruction project. No feasible mitigation measures are available to reduce this temporary cumulative noise impact to less than significant. The Runway 8R-26L runway rehabilitation/reconstruction project would result in less-than-significant aircraft noise impacts once operational.[14] Implementation of MM NOI-1 would include a residential noise program for housing units located near the Airport, which would reduce impacts to less-than-significant levels. Therefore, the proposed Project's contribution to temporary cumulative noise impacts would not be cumulatively considerable. Because impacts are less than significant and the potentially significant aircraft noise impact have been reduced to less than significant with the proposed mitigation measure, no further analysis is required to identify the potential for significant noise impacts from the proposed Project.

Comment F-9:

While we appreciate that the OIAA has a Rules and Regulations Manual for ONT with voluntary noise mitigation operating procedures and restrictions, the reality is that the OIAA does little more than "encourage the airlines operating at ONT to use quieter aircraft, to re-engine aircraft to meet the most restrictive aircraft engine noise standards established by the FAA, and to retire old/noisier aircraft" (Appendix 5.10-1, p. 3, emphasis added). Resident complaints about noise and testimony to the OIAA are not responded to and there are no effective avenues for relief provided to the affected residents. Despite claims that "Contra Flow" minimizes noise exposure during the night and that engine run-ups are prohibited, when residents reach out because planes are flying overhead at low altitudes, are regularly departing to the east during nighttime,

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14 OIAA. *Ontario International Airport South Airport Cargo Center Project Draft Environmental Impact Report*.

and revving their engines, they are ignored, even when they provide recordings of the run-ups and flight information. For this reason, we feel it is imperative that an active, ongoing Noise Roundtable that includes members of the public and representatives from local jurisdictions and stakeholder groups, including Chino, be established.

Response F-9:

OIAA maintains a noise hotline for community members to register noise complaints, and also offers an online form that can be filled out on the Airport website (see **Response to Comment F-4**). OIAA internal policy for responding to operational noise complaints is to do so via email or telephone. OIAA staff strive to contact complainants within a reasonable timeframe following reported noise events to discuss questions or concerns about general or specific aircraft operations.

Contra-flow is OIAA's preferred flight procedure to reduce noise over nearby residential areas during nighttime and early morning hours. When weather conditions allow, aircraft operating between the hours of 10 PM and 7 AM take off to the east and arrive/land from the west. Most air carriers employ the contra-flow procedure during the established times. However, atmospheric conditions (wind and low cloud ceilings) or aircraft operational requirements intermittently require deviation from contra-flow operations, which may result in brief noise events over residential areas. All Airport projects that would potentially cause a change to day-evening-night average noise levels from aircraft operations, including the proposed Project, are analyzed for noise impacts according to State and federal regulations.

Comment F-10:

As noted in Appendix 5.10-1, page 7, "There are also a few unmitigated residences located within the western extent of the area in which aircraft noise would increase with the Proposed Project." There are more than just "a few" residences that will be impacted by the airplane noise created by this Project. Many of these residences are within the City of Chino and should be provided with a noise mitigation program.

Response F-10:

The Aircraft Noise Modeling in the *Aircraft Noise Assessment* (Appendix 5.10-1 to the Draft EIR) and discussed in Section 5.10 of the Draft EIR was developed to identify Baseline (existing) and future year Community Noise Equivalent Level (CNEL) 65, 70, and 75 dBA contours. The future Project CNEL contours were compared to the Baseline contours to determine if any noise-sensitive land uses would be significantly impacted by the proposed Project consistent with the requirements of CEQA and the *CEQA Guidelines*. While page 7 of the *Aircraft Noise Assessment* states "a few unmitigated residences," this is clarified in Table 5 on page 8 of the *Aircraft Noise*

Assessment, which provides the estimated number of housing units and persons within the CNEL 65–69, 70–74, and 75+ dB(A) contours. See **Response to Comment F-6** for more information on the number of housing units and persons identified within the CNEL 65–69, 70–74, and 75+ dB(A) contours from the *Aircraft Noise Assessment*.

As discussed in **Response to Comment F-6** and on page 5.10-46 in the Draft EIR and within the notes in Table 5 of the *Aircraft Noise Assessment*, when avigation easements are considered for the proposed Project compared to Baseline Conditions, the number of additional unmitigated housing units in 2025 is 3 units with the affected population being 14 additional persons, and in 2029 the number of housing units affected is 12 units with the affected population being 51 additional persons. None of these units are located within the Ciyt of Chino. When comparing the proposed Project to the No Action Alternative, in the year 2025 with the proposed Project it is estimated that there would be five (5) additional unmitigated housing units and 23 persons within the CNEL 65–69 dBA contour, and no housing units or persons within the CNEL 70+ dBA contour.[15] By the year 2029 with the proposed Project, it is estimated that there would be 15 additional unmitigated housing units and 63 additional persons within the CNEL 65–69 dBA contour, and no housing units or persons within the CNEL 70+ dBA contour (see page 5.10-51 in the Draft EIR). Implementation of MM NOI-1, which develops a residential noise program for housing units affected by aviation noise generated by the proposed Project, would reduce impacts related to aircraft noise to less-than-significant levels. These impacted housing units and persons that would be provided with the residential noise program outlined in MM NOI-1 are not located within the City of Chino (the impacted housing units are located approximately 3.2 miles southwest of the Project site, as shown in Figures 5.10-5 through 5.10-9 in the Draft EIR). The residential noise program in MM NOI-1 would be required specifically to reduce noise levels at the unmitigated housing units identified in the Draft EIR. No significant and unavoidable impacts would occur at other homes in the area, including homes in the City of Chino. Therefore, because there are no noise impacts for the City of Chino, mitigation is not required and a noise mitigation program for residences within the City of Chino is not needed or required to reduce the impacts of the proposed Project.

As discussed in **Response to Comment F-4**, the OIAA must comply with State and federal requirements associated with attenuation of operational noise at ONT and has identified

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15 Table 5.10-15 in the Draft EIR shows that in the year 2025 with the proposed Project it is estimated that there would be four additional unmitigated housing units and 18 persons within the CNEL 65–69 dBA. This is a typo that has been corrected in the Final EIR to five (5) additional unmitigated housing units and 23 persons within the CNEL 65–69 dBA as stated in the *Aircraft Noise Assessment*. Please see **Section 2.0: Additions and Corrections** in this Final EIR.

measures to reduce noise to the extent possible. The Federal Aviation Administration (FAA) is solely responsible for the control of aircraft operations, including taxiing of aircraft within airfield movement areas.[16] The OIAA has no authority over air traffic routes, altitudes of aircraft in the air, or time of operation. For this reason, mitigation of noise impacts from air traffic routes, altitudes, etc. is not required under CEQA.

However, carriers serving ONT are required to comply with Section 3, Aircraft Operations, and Section 5, Aircraft Noise Mitigation Operating Procedures and Restrictions, of the OIAA Rules and Regulations. While OIAA has identified best management practices to limit potential effects of operational noise, OIAA regulations do not supersede the authority of the FAA or pilots in command of aircraft to conduct safe aircraft operations. Additionally, the OIAA has no control over equipment operated by carriers serving ONT, although all aircraft operating under the purview of the FAA's Airworthiness Certification standards. No further analysis is warranted.

Comment F-11:

4) An Air Quality Technical Report (Appendix 5.02-1) has been provided. How specifically has this study discussed the impacts to the residents of Chino as it relates to air quality? As indicated in the November 2021 letter, any air quality study provided should include impacts to the climate from CO2 and methane emissions. Specifically, it should focus on cargo aircraft that utilize flight paths that go over the City of Chino, and also vehicles that obtain freight from logistics facilities and/or ship freight to logistics facilities in the area surrounding the airport, not just from the City of Ontario. How will air quality be mitigated from increased trucking and cargo aircraft that could have an impact on the residents and businesses in the City of Chino?

Response F-11:

As discussed in the *Air Quality Technical Report* (Appendix 5.2-1 to the Draft EIR), the air quality analysis was developed based on the SCAQMD Modeling Guidance for AERMOD, the USEPA Guideline on Air Quality Models, and the SCAQMD CEQA Air Quality Handbook. The significance thresholds and analysis methodologies in the SCAQMD CEQA Air Quality Handbook were used in the *Air Quality Technical Report* to evaluate Project impacts for construction, operations, and air toxics. SCAQMD has identified thresholds to determine the significance of regional air quality emissions for construction activities and project operation.

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16 The movement area comprises all runways, taxiways, and areas of Ontario International Airport (ONT) used for taxiing, takeoff, and landing of aircraft under control of the FAA's ONT Airport Traffic Control Tower. The movement area excludes aircraft aprons, cargo ramps, leased areas, and public aircraft parking positions.

As discussed in the *Air Quality Technical Report* and Section 5.2 in the Draft EIR, construction-related criteria air pollutant emissions generated during construction of Phase 1 and Phase 2 of the proposed Project would not exceed any SCAQMD significance thresholds. Impacts would be less than significant. Nevertheless, the proposed Project would incorporate PDFs and implement mitigation measures to further reduce construction emissions (see **Table TR-1** in **Topical Response 1: Sustainable Project Design Features and Mitigation Measures**, above).

However, the estimated criteria air pollutant emissions generated by operation of Phase 1 of the proposed Project would exceed SCAQMD significance thresholds for CO, VOC, and NOx, primarily due to aircraft emissions, followed by use of employee vehicles, delivery trucks, and emergency generators. The proposed Project would exceed SCAQMD significance thresholds for CO, VOC, NO_X, and SO_2 emissions at buildout. Impacts during Phase 1 and Phase 2, therefore, would be potentially significant. The proposed Project would incorporate air quality PDFs and implement mitigation measures (see **Table TR-1** in **Topical Response 1: Sustainable Project Design Features and Mitigation Measures**, above), as well as MM TRANS-1 through MM TRANS-5, to reduce operational air quality emissions to the greatest extent feasible. However, as disclosed in Section 5.2 in the Draft EIR, the proposed Project's operation-related criteria air pollutant emission impacts relative to the SCAQMD significance thresholds would be significant and unavoidable due to the absence of feasible mitigation measures and alternatives to reduce those impacts to below the level of significance.

Additionally, an air quality analysis was conducted to determine the ambient concentrations of criteria air pollutants at nearby receptors which would result from project construction and operation. The *Air Quality Technical Report* and Section 5.2 in the Draft EIR concluded that construction and operation of the proposed Project is not likely to result in exceedance of Ambient Air Quality Standards as a result of its criteria air pollutant emissions or result in adverse health effects as a result of its air toxics emissions at all modeled receptor locations.

The air quality analysis estimated emissions due to construction activities, aircraft operations, employee and delivery truck trips, standby generators, and other Project-related sources. The emission estimates were based on the level of activity/operations, the type of operation and appropriate emission factors.

The dispersion model used for the air quality analysis, USEPA's AERMOD, is a state-of-the-art dispersion model that uses an emissions inventory to estimate concentrations of pollutants at specific locations. Dispersion models use hourly average meteorological data, terrain elevation data, and source emission release characteristics to compute downwind pollutant concentrations over periods that can range from one hour to one year. For the air quality dispersion analysis, concentrations were predicted at enough locations (referred to as receptors) to identify

maximum concentrations. Receptors were grouped into several categories: boundary receptors were in areas along the Airport boundary at a spacing of approximately 10 degrees, sensitive receptors included schools, parks, residential areas, and health/daycare centers located in the vicinity of the Airport, and worst-case receptors were also selected near air emissions sources such as near runway ends. These receptors represent sites where the pollutant concentrations are expected to be the highest and the public would reasonably be expected to occupy the area for a period of one hour or more. Additional receptors were placed to represent on-site airport workers, off-site workers, residences, and schools nearby the Airport. The receptors are shown within Figures A-4 through A-8 of the *Air Quality Technical Report*.

Generally, a majority of aircraft emissions occur during aircraft ground taxi travel (CO, SOx, and VOC) and during the initiation of takeoff (PM and NOx). Aircraft emissions occurring above ground level tend to be a lower portion of the total aircraft landing and takeoff cycle emissions. Therefore, the maximum Project-related concentrations occur in-line and directly beyond the runway ends and nearest to the Project site and along the Airport boundary. As such, receptors were generally limited to within two miles of the Airport boundary, in-line with the runway ends, and near the Project site (i.e., on the south side of the Airport).

Secondly, the aircraft activities comprising a landing/take-off cycle produce ground-based emissions (i.e., emissions in aircraft taxi/idle mode) and emissions that occur above ground level (i.e., during aircraft modes of approach, climb-out, and takeoff). While the taxi/idle mode and portions of the approach and climb-out modes occur within the study limits, the air quality study area—for the purpose of estimating the level of emissions that could impact air pollutants—extends beyond the area described up to the atmospheric mixing height (i.e., the height above the ground in which a pollutant disperses). In the Ontario area, the atmospheric mixing height is 2,402 feet above ground level. To be at this altitude, aircraft arriving/departing would be approximately five miles from the Airport (i.e., the evaluation includes all aircraft activity occurring approximately five miles from the end of any of the airport's runways). The dispersion modeling analysis accounts for runway utilization, operational profiles, flight paths, and truck routes to estimate air quality impacts. Therefore, aircraft under approach or takeoff are located further from the Airport and higher in altitude such that air pollutant concentrations from these operating modes are lower than emissions from aircraft operating on the ground and during the start of takeoff. Compared to the Airport boundary, this results in lower Project-related concentrations further away from the Airport such as within the City of Chino.

Additionally, the air quality analysis included estimated impacts due to employee and delivery truck trips. As shown in Figures 3 through 6 of the *Traffic Study* (Appendix 5.12 to the Draft EIR), the distribution of truck trips would occur within the City of Ontario and utilize streets within the City of Ontario (Mission Boulevard, North Euclid Avenue, Grove Avenue, South Vineyard

Avenue, South Archibald Avenue, Jurupa Street, and South Haven Avenue) to access the nearby freeways (I-10 and I-15). As the truck trip distribution to the freeways would not occur on streets within the City of Chino, which is located approximately 3.2 miles southwest of the Project site, minimal, if any, increase in truck trips in the City of Chino is anticipated with implementation of the proposed Project. Therefore, no significant air quality or GHG impacts to the residents and businesses in the City of Chino as a result of the increase in truck trips from the proposed Project would occur, inclusive of all related truck trips.

Maximum air pollutant concentrations due to project operations occur to the east of the Project site near Runway 26L. Notably, the primary wind direction at the Airport (see Figure A-2 of the *Air Quality Technical Report*) is from the west-southwest. The City of Chino is located to the southwest of the Airport (i.e., upwind) and would be expected to receive lower concentrations than the locations downwind. Maximum concentration due to construction activities occur nearest to the Project site and dissipate quickly moving farther away from the Project. All concentrations and health impacts due to construction and operations are below the applicable SCAQMD significance thresholds at the locations of maximum impacts; impacts within the City of Chino would be expected to be much lower.

The project design features and mitigation measures in **Table TR-1** in **Topical Response 1: Sustainable Project Design Features and Mitigation Measures**, above would reduce criteria air pollutants and GHG emissions. Although the Project-related regional air emissions and GHG emissions are significant and unavoidable, the air concentrations and health impacts due to Project construction and operation are expected to be less than significant with mitigation at the locations of maximum impacts and therefore (for reasons noted previously) within the City of Chino.

See **Topical Response 1: Sustainable Project Design Features and Mitigation Measures**, above, and **Section 4.0: Mitigation Monitoring and Reporting Program** of the Final EIR for further information on the PDFs and MMs implemented with the proposed Project.

Comment F-12:

5) As mentioned, the proposed cargo facility at the Ontario Airport is likely to obtain and/or ship cargo freight from local logistics buildings in the City of Ontario and surrounding communities, including the City of Chino. A Transportation Study (Appendix 5.12) was provided. How specifically has this study addressed the traffic and infrastructure impacts to the roadways within the City of Chino being utilized to collect and deliver freight to and from the proposed cargo facility at the Ontario Airport?

Response F-12:

The *Traffic Study* (Appendix 5.12 to the Draft EIR) was conducted in consultation with the City of Ontario. As discussed in Appendix A to the *Traffic Study*, the scope of the traffic analysis was determined based on the characteristics of the proposed Project. For the employee trip distribution, home-to-work travel patterns were developed using the San Bernardino County travel demand forecasting model (SBTAM) and Census Bureau Longitudinal Employer-Household Dynamics (LEHD) data. SBTAM is a socio-economic model (population and employment). The employment associated with the proposed Project was added to the Traffic Analysis Zone (TAZ) containing the Project site in the model.

The distribution for truck trips was developed based on the known destinations of each truck trip along the shortest designated truck routes, per the City of Ontario Truck Route Map (see Attachment B to Appendix A of the *Traffic Study*) and the trucking schedules provided by the proposed Project applicant. Figures 3 through 6 of the *Traffic Study* show the AM trip distribution (the highest trip-generating period), the proposed Project trip distribution for employees (non-truck trips), the truck assignments for Phase 1, and the truck assignments for Phase 2. As discussed in **Response to Comment F-6**, the nearest boundary of the City of Chino relative to the proposed Project site is about 3.2 miles away, and truck trips associated with the proposed Project will primarily use streets in the City of Ontario to access nearby freeways. No increase in truck trips in the City of Chino will result from implementation of the proposed Project. Therefore, no significant traffic/transportation impacts to the roadways within the City of Chino would occur as a result of the proposed Project.

Comment F-13:

Please find the following in response to Ontario International Airport Authority's (OIAA) request for comments from responsible agencies on the proposed South Airport Cargo Center Project (Project). These comments address the scope and content of the Notice of Preparation (NOP) of an Environmental Impact Report (EIR) relevant to potential impacts on the City of Chino (City) from the proposed Project. The City understands that the OIAA is the Lead Agency and will prepare an EIR in compliance with the California Environmental Quality Act (CEQA). Given the scope and potential impacts of the Project and proposed actions, we stress the applicability of the National Environmental Policy Act (NEPA), which would also prepare an Environmental Impact Statement (EIS) to include a noise study (per 14CFR PART 150) of ground, air, and land use for future environmental impacts to the Project area and surrounding communities. This study would also facilitate federal programs to mitigate noise, water, and air quality issues while utilizing a professional third—party expert to conduct the needed analyses per Federal Aviation Administration (FAA) Order 1050.1. During the November 10, 2021 Scoping Meeting, Project Consultants and OIAA staff stressed that the proposed Project is in preliminary stages and

discussions with FAA are just beginning. Based on the information provided to date, the City believes the EIR must evaluate both the long term and short-term, as well as cumulative environmental impacts of the Project, with emphasis placed on noise, air quality, traffic and safety. Specific requirements include:

- Comprehensive computer modeling using the FAA standard Aviation Environmental Design Tool (AEDT), a software system that dynamically models aircraft performance in space and time to produce fuel bum, air emissions, and noise. The AEDT must evaluate various project alternatives and a no-project alternative to enable quantitative assessment of the impacts.
- A sleep interference assessment is required to determine the degree of awakenings and other effects upon the residential communities from the increased aircraft operations.
- Revision of air traffic patterns for arrivals and departures to limit the low-flying aircraft currently awakening neighbors near the airport. The sleep interference study must assess the effects of this mitigation program.
- With the increased noise impact on surrounding communities, criteria must be developed for noise mitigation of residences, schools, and health care facilities. One likely mitigation plan is a sound insulation program (SIP) like that already affected for homes near Ontario International Airport (ONT).
- A separate noise study is also necessary to determine the noise impact of additional car and heavy truck traffic generated by the proposed Project.
- A study is required for the traffic effects on surrounding communities from increased surface traffic, for automobile and heavy truck transport to and from the proposed cargo facilities.
- The specific effects on climate change, due to emission of CO2 and methane from aircraft taxiing, takeoffs and landings, surface vehicular traffic, and fuel storage must be quantified.
- A crash hazard potential study is required to determine the potential for aircraft crashes in the surrounding communities and the possible effects on insurance rates for homeowners.
- Mitigation measures must be evaluated and assessed for all environmental effects.

Please address and/or notify our contact person for any/or all information or notices relative to your project:

Warren Morelion, AICP
City Planner
City of Chino
13220 Central Avenue

Chino,CA 91710

We urge the Federal Aviation Administration to prepare an EIS to comply with obligations under NEPA. The EIS should contain comprehensive analyses of alternatives and mitigation measures for the significant impacts of the proposed actions. Fulfilling the FAA's obligation under NEPA to fully evaluate the potential to significantly affect the quality of the human environment will also provide an extended opportunity to work with the local community to jointly develop mitigation measures to improve the Project and reduce its effects on the community. The City appreciates this opportunity to comment on the proposed Project and looks forward to working with OIAA and the FAA toward a legally supportable environmental review and successful implementation of an environmentally compliant and properly mitigated Ontario International Airport South Airport Cargo Center Project. We look forward to working with you to ensure that mitigation, avoidance, and minimization measures that protect our residents are implemented as a condition of approval of EIR and EIS approval.

Response F-13:

The NOP comment letter was received by the OIAA and included in the list of letters received from agencies in Section 2.0 of the Draft EIR. Section 2.0 includes the summaries of the comments in the City of Chino's NOP comment letter and the sections of the Draft EIR that these comments are addressed in.

Comment F-14:

It is our understanding that the OIAA has initiated the preparation of a separate Environmental Assessment (EA) by the Federal Aviation Administration (FAA) in compliance with the National Environmental Policy Act (NEPA) to identify and consider the potential environmental impacts associated with the proposed Project. Given the potential impacts of the Project on Chino residents, an Environmental Impact Statement (EIS) that includes a noise study (per 14CFR PART 150) of ground, air, and land use for future environmental impacts to the Project area and surrounding communities is vital. This study would also facilitate federal programs to mitigate noise, water, and air quality issues while utilizing a professional third-party expert to conduct the needed analyses per Federal Aviation Administration (FAA) Order 1050.1 — something which our residents, who will bear the burdens of the Project by being subjected to sleep disturbance, adverse health effects, diminished quality of life, and safety hazards, deserve. FAA review should include comprehensive computer modeling using the FAA standard Aviation Environmental Design Tool (AEDT), a software system that dynamically models aircraft performance in space and time to produce fuel burn, air emissions, and noise. The AEDT must evaluate various Project alternatives and a no-Project alternative to enable a quantitative assessment of the impacts. Fulfilling the FAA's obligation under NEPA to fully evaluate the potential to significantly affect

the quality of the human environment will also provide an extended opportunity to work with the local community to jointly develop mitigation measures to improve the Project and reduce its effects on the community.

Response F-14:

Environmental review of the proposed Project will be conducted as required to comply with the National Environmental Policy Act (NEPA) by the FAA. FAA, as the lead federal agency responsible for complying with NEPA, will determine the appropriate level of environmental documentation based on their policies and procedures. Any further response is outside of the purview of the CEQA document.

Comment F-15:

The City appreciates this opportunity to comment on the EIR but notes that several previously requested studies and mitigation measures that are necessary to ensure the successful implementation of an environmentally compliant and properly mitigated Ontario International Airport South Airport Cargo Center Project are outstanding. We request that these studies and mitigation measures, including the evaluation and assessment of these measures for environmental effects, be provided. We remain committed to working with you to ensure that mitigation, avoidance, minimization, and communication measures that protect our residents are implemented as a condition of approval of the EIR and EIS for this Project. If you have any questions, please contact Principal Planner Michael Hitz by email at mhitz@cityofchino.org or at 909-334—3448.

Response F-15:

The NOP comment letter was received by the OIAA and included in the list of letters received from agencies in Section 2.0 of the Draft EIR. Section 2.0 includes the summaries of the comments in the City of Chino's NOP comment letter and the sections of the Draft EIR that these comments are addressed in. All comments and request for studies, mitigation measures, and evaluation and assessment of measures are discussed in **Responses to Comments F-1** through **F-14** and addressed in the Draft EIR and Final EIR. No further analysis is needed as discussed in the responses to the previous comments to identify the potential significant impacts of the proposed Project.

From: Natasha Walton <notlaw2018@gmail.com>
Date: April 27, 2023 at 5:07:13 PM MDT
To: "Keith, Kevin" <kkeith@flyontario.com>
Subject: Draft EIR for the South Airport Cargo Center (SCH #2021100226) Comments

Please accept the followig email in place of the previous email I had just sent today at 15:48. Thank you.

Dear Ontario International Airport Authority:

I am a board member of the Inland Valley Advocates for the Environment (IVAE) and wildlife biologist who has worked as an environmental scientist for our state. I'd like to share some of our organization's comments on the Draft Environmental Impact Report (EIR) for the South Airport Cargo Center (SCH #2021100226).

We appreciate you including MM BIO-1 (included below for reference) in case burrowing owls (BUOWs) are discovered within or near the project site. However, we do ask that you please carry out the following regardless of whether or not BUOWs are observed on or near the project area prior to construction:

G-1

1) Avoid construction activities during BUOW breeding season which is from February 1 to August 31.
2) Create a native grassland preserve that would be protected in perpetuity on current open land already owned by the OIAA. The cumulative impacts of all recent/current projects, near and on airport property, on habitat loss for burrowing owls must be mitigated. For example, the California Logistics Center (figure 4.2 on p188/931 of the Draft EIR) would not only result tn the loss of habitat for owls residing on that particular airport property, but also for owls throughout the airport and Ontario area itself that have used the open areas on these lands for foraging, dispersing, etc. for many years. Please also note the following:

a) A recent study by Scfmidt et al. (2013) indicates that native grasslands do not result in a higher risk for bird strikes than highly-mowed airport fields (See https://digitalcommons.unl.edu/cgi/viewcontent.cgi?article=2563&context=icwdm_usdanwrc#:~:text=Land%20managed%20as%20native%20warm%20season%20grasses%20%28NWSG%29,small%20mammals%20that%20are%20prey%20for%20hazardous%20raptors)

b) Grasslands provide soil carbon sequestering (Bai and Cotifo 2022) that may help offset the expected significant impacts that the project is expected to have on greenhouse gas emissions such as carbon dioxide (See https://www.science.org/doi/10.1126/science.abo2380).

G-2

As someone who has studied bats in graduate school and throughout my career, I am disappointed that potential bat roost sites have not been properly evaluated. In particular, the pallid bat (a California species of special concern) could be present since they can roost in trees and a variety of human structures (such as occupied and unoccupied buildings), and could be foraging in nearby fields; the western yellow bat, another species of special concern, roosts in trees as well (Western Bat Working Group 2023). Many bat species can also become habituated to human activity, even in loud environments; in fact, I've seen bats emerging at dusk during rush hour from an overpass that crossed the 101 Freeway. In addition, figure 2 of appendix D shows buildings that I would inspect more closely for signs of bats like guano and urine staining. Please note that all bat species can be of concern to

G-3

California Department of Fish and Wildlife (CDFW), and to folks like myself, since they are difficult to monitor and are being lost throughout our region. Therefore, our orgaization asks you to carry out the following:

1) Avoid removing trees/buildings and other construction activities during the bat maternity season which is from March 1 to August 31 (Caltrans Bat Mitigation Guide 2019).
2) Remove trees in a two-step process to avoid harming tree-roosting bats that may be difficult to find.
3) Have qualified bat biologists inspect the project area and an appropriate buffer area for signs of bats.
4) Conduct bat emergence and night roost surveys within 14 days of beginning construction at locations that show any potential for bat day and night roosts, respectively.
4) If bats are determined to be present, consult with CDFW on creating a bat mitigation plan.

G-3 cont'd

In addition, please put me on the public notice list for this project.

G-4

Thank you for your time and consideration.

Sincerely,

Natasha Walton

Board Member, Inland Valley Advocates for the Environment
BS, Wildlife and Fisheries Biology, UC Davis
MS, Biological Sciences, Cal Poly Pomona

Excerpt from Draft EIR:

MM BIO-1: Burrowing Owl. All disturbed areas of the Project site that were determined to have a low potential to provide suitable habitat for burrowing owls, which primarily includes the existing track infield grassy areas of the Project site, require focused preconstruction surveys to be conducted; the first take avoidance survey shall be conducted within 14 days prior to ground disturbance and the second take avoidance survey shall be conducted 24 hours prior to ground disturbance to determine presence of burrowing owls. These surveys shall conform to the survey protocol established by the CDFW Staff Report on Burrowing Owl Mitigation (CDFW 2012) and will be conducted by a qualified biologist across all suitable breeding, wintering, and foraging habitat within the Project and appropriate buffer. Copies of the survey results shall be submitted to CDFW and OIAA.

• If no burrowing owls are detected, no further mitigation is necessary.

• If burrowing owls are detected during focused surveys and/or take avoidance surveys, CDFW will be immediately informed of its location and status. The project will avoid all impacts to burrowing owls onsite. If this is not feasible, a Burrowing Owl Protection Plan will be prepared by a qualified biologist, which must be approved by CDFW prior to initiating the project. The Burrowing Owl Protection Plan will include conserving all nesting, occupied, and satellite burrows and/or burrowing owl habitat such that the habitat acreage, number of burrows, and burrowing owls impacted are maintained and/or replaced. Further coordination with CDFW will occur to identify mitigation for the loss of habitat through the acquisition, conservation, and management of in-kind habitat. Lands conserved will include 1) sufficiently large acreage with

G-5

fossorial mammals present; 2) permanent protection through a conservation easement for the purpose of conserving burrowing owl habitat and prohibiting activities incompatible with burrowing owl use; 3) development and implementation of a mitigation land management plan to address long-term ecological sustainability and maintenance of the site for burrowing owls; and 4) funding for the maintenance and management of mitigation land through the establishment of a long-term funding mechanism such as an endowment (CDFW, 2012).

G-5 cont'd

COMMENT LETTER G

Inland Valley Advocates for the Environment
Natasha Walton, Board Member
April 27, 2023

Comment G-1:

I am a board member of the Inland Valley Advocates for the Environment (IVAE) and wildlife biologist who has worked as an environmental scientist for our state. I'd like to share some of our organization's comments on the Draft Environmental Impact Report (EIR) for the South Airport Cargo Center (SCH #2021100226). We appreciate you including MM BIO-1 (included below for reference) in case burrowing owls (BUOWs) are discovered within or near the project site. However, we do ask that you please carry out the following regardless of whether or not BUOWs are observed on or near the project area prior to construction:

1) Avoid construction activities during BUOW breeding season which is from February 1 to August 31.

Response G-1:

As described on page 5.3-20 of the Draft EIR, the Project site has a low potential to support burrowing owls and, for this reason, focused surveys for burrowing owl were not warranted. The *Biological Resources Assessment* stated no burrowing owls (BUOWs) or recent signs (i.e., pellets, feathers, castings, or whitewash) were observed during the field investigation. Portions of the Project site, primarily the eastern undeveloped areas, are unvegetated and/or vegetated with a variety of low-growing plant species that allow for line-of-sight observation favored by BUOWs. However, no suitable burrows (>4 inches in diameter) capable of providing roosting and nesting opportunities were observed on site. Further, the Project site supports and is surrounded by tall structures, light poles, and fences that offer perching opportunities for larger raptor species (i.e., red-tailed hawk) that prey on BUOWs. In addition, due to the predominance of developed land in the immediate vicinity of the Project site, the site is fairly isolated from suitable habitat nearby.

Further, the intensity and frequency of existing routine anthropogenic disturbance associated with on-site weed abatement activities (i.e., mowing) are likely to preclude BUOWs from occurring on site. Based on the results of the field investigation, it was determined that the Project site has a low potential to support BUOWs (see page 9 of the *Biological Resources Assessment* [Appendix 5.3-1 of the Draft EIR]). Nevertheless, to avoid potential impacts, Mitigation Measure (MM) BIO-1 would require pre-construction surveys to be conducted, to confirm no owls are present on the Project site and to ensure impacts to BUOWs are avoided. Given the proposed Project schedule described in Section 3.0: Project Description of the Draft

EIR, the proposed Project Applicant and OIAA cannot commit to avoiding construction between February 1 to August 31. Further, avoiding construction between February 1 to August 21 would not achieve any reduction in environmental impacts. Additionally, as discussed on page 5.3-17 of the Draft EIR, the Project site contains no suitable habitat nor were BUOWs observed during the survey conducted on September 29, 2021. Therefore, this additional mitigation measure is not warranted or necessary.

Comment G-2:

2) Create a native grassland preserve that would be protected in perpetuity on current open land already owned by the OIAA. The cumulative impacts of all recent/current projects, near and on airport property, on habitat loss for burrowing owls must be mitigated. For example, the California Logistics Center (figure 4.2 on p188/931 of the Draft EIR) would not only result in the loss of habitat for owls residing on that particular airport property, but also for owls throughout the airport and Ontario area itself that have used the open areas on these lands for foraging, dispersing, etc. for many years. Please also note the following:

a) A recent study by Scfmidt et al. (2013) indicates that native grasslands do not result in a higher risk for bird strikes than highly-mowed airport fields (See https://digitalcommons.unl.edu/cgi/viewcontent.cgi?article=2563&context=icwdm_usdanwrc#:~:text=Land%20managed%20as%20native%20warm%20season%20grasses%20%28NWSG%29,small%20mammals%20that%20are%20prey%20for%20hazardous%20raptors)

b) Grasslands provide soil carbon sequestering (Bai and Cotifo 2022) that may help offset the expected significant impacts that the project is expected to have on greenhouse gas emissions such as carbon dioxide (See https://www.science.org/doi/10.1126/science.abo2380).

Response G-2:

As analyzed and concluded in the *Biological Resources Assessment* (Appendix 5.3-1 of the Draft EIR) and Section 5.3: Biological Resources in the Draft EIR, the proposed Project would not impact BUOWs or BUOW habitat and for this reason, would not contribute to any cumulative impacts on BUOWs. Thus, the suggested mitigation measure for cumulative impacts to BUOWs would not lessen any environmental impact and, therefore, is not needed.

In addition, establishing a native grassland preserve on current open land already owned by OIAA is not feasible. The Airport property, as a fully operating airport, is not a viable location for a native grassland preserve for the burrowing owls. Such a preserve would be inconsistent with the FAA-approved Wildlife Hazard Management Plan (WHMP) for the Airport (**Appendix 3.0** to this Final EIR), which is required by federal regulations, because it would increase overall avian presence—and not just BUOW—at the Airport which would increase the potential for hazards to

aircraft. This is a safety issue, both for commercial flights and passengers, but also for burrowing owls. The WHMP identifies birds as the "greatest threat to aviation at ONT" and states that "birds are generally considered the most hazardous forms of wildlife at ONT." The WHMP obligates the OIAA to "actively reduce attractive wildlife habitat" at ONT and to reduce wildlife that attracts predators. Establishment of a BUOW preserve at or near the Airport would therefore be inconsistent with the WHMP.

Comment G-3:

As someone who has studied bats in graduate school and throughout my career, I am disappointed that potential bat roost sites have not been properly evaluated. In particular, the pallid bat (a California species of special concern) could be present since they can roost in trees and a variety of human structures (such as occupied and unoccupied buildings), and could be foraging in nearby fields; the western yellow bat, another species of special concern, roosts in trees as well (Western Bat Working Group 2023). Many bat species can also become habituated to human activity, even in loud environments; in fact, I've seen bats emerging at dusk during rush hour from an overpass that crossed the 101 Freeway. In addition, figure 2 of appendix D shows buildings that I would inspect more closely for signs of bats like guano and urine staining. Please note that all bat species can be of concern to California Department of Fish and Wildlife (CDFW), and to folks like myself, since they are difficult to monitor and are being lost throughout our region. Therefore, our orgaization asks you to carry out the following:

1. Avoid removing trees/buildings and other construction activities during the bat maternity season which is from March 1 to August 31.
2. Remove trees in a two-step process to avoid harming tree-roosting bats that may be difficult to find.
3. Have qualified bat biologists inspect the project area and an appropriate buffer area for signs of bats.
4. Conduct bat emergence and night roost surveys within 14 days of beginning construction at locations that show any potential for bat day and night roosts, respectively.
5. If bats are determined to be present, consult with CDFW on creating a bat mitigation plan.

Response G-3:

As discussed on Page 12 of the Biological Resources Assessment, structures and ornamental tree species may provide suitable roosting opportunities for local common bat species (i.e., California myotis (Myotis californicus), Mexican free-tailed bat (Tadarida brasiliensis), and little brown bat (Myotis lucifugus)), but the degree and frequency of existing and routine disturbance from existing onsite activities likely precludes them from roosting on-site. Additionally, most of these

bats roost in caves, rock crevices, buildings, and sometimes dead trees, and the ornamental plant species found in the area do not typically provide suitable long-term roosting or maternity habitat. None of the sensitive bat species known to occur in the area are expected to occur onsite. Additionally, the species noted in the comment, pallid bat and western yellow bat, were not listed in the IPaC Species List or observed in the field survey.

To address point 1 regarding avoiding removing trees/buildings and other construction activities during the bat maternity season which is from March 1 to August 31, As discussed in Response to Comment G-1, given the proposed Project schedule described in Section 3.0 of the Draft EIR, the proposed Project Applicant and OIAA cannot commit to avoiding construction between February 1 to August 31. Further, avoiding construction between February 1 to August 21 would not achieve any reduction in environmental impacts as there would be no significant impacts to bats as a result of the proposed Project.

With the addition of Mitigation Measure MM BIO-1, below, trees being removed on site would be surveyed for bat roosting 14 days prior to construction, which would avoid the potential of harming tree-roosting bats.

The Final EIR will incorporate the following mitigation measure that would require pre-construction bat roosting surveys to confirm no maternity roosts are established and present on the site prior to construction and, if bats are determined to be present, require consultation with CDFW on creating a bat mitigation plan.

MM BIO-3: **Roosting Bats.** A pre-construction bat roosting survey shall be conducted by a qualified bat biologist on structures and trees being removed or impacted by construction on site that may provide suitable roosting opportunities for local common bat species within 14 days prior to construction. If bats are determined to be present, CDFW shall be consulted on creating a bat mitigation plan.

Comment G-4:

In addition, please put me on the public notice list for this project. Thank you for your time and consideration.

Response G-4:

The Inland Valley Advocates for the Environment has been added to the list of agencies to receive notifications related to the proposed Project. No further response is necessary.

Comment G-5:

Excerpt from Draft EIR:

MM BIO-1: Burrowing Owl. All disturbed areas of the Project site that were determined to have a low potential to provide suitable habitat for burrowing owls, which primarily includes the existing track infield grassy areas of the Project site, require focused preconstruction surveys to be conducted; the first take avoidance survey shall be conducted within 14 days prior to ground disturbance and the second take avoidance survey shall be conducted 24 hours prior to ground disturbance to determine presence of burrowing owls. These surveys shall conform to the survey protocol established by the CDFW Staff Report on Burrowing Owl Mitigation (CDFW 2012) and will be conducted by a qualified biologist across all suitable breeding, wintering, and foraging habitat within the proposed Project and appropriate buffer. Copies of the survey results shall be submitted to CDFW and OIAA.

- If no burrowing owls are detected, no further mitigation is necessary.
- If burrowing owls are detected during focused surveys and/or take avoidance surveys, CDFW will be immediately informed of its location and status. The project will avoid all impacts to burrowing owls onsite. If this is not feasible, a Burrowing Owl Protection Plan will be prepared by a qualified biologist, which must be approved by CDFW prior to initiating the project. The Burrowing Owl Protection Plan will include conserving all nesting, occupied, and satellite burrows and/or burrowing owl habitat such that the habitat acreage, number of burrows, and burrowing owls impacted are maintained and/or replaced. Further coordination with CDFW will occur to identify mitigation for the loss of habitat through the acquisition, conservation, and management of in-kind habitat. Lands conserved will include 1) sufficiently large acreage with fossorial mammals present; 2) permanent protection through a conservation easement for the purpose of conserving burrowing owl habitat and prohibiting activities incompatible with burrowing owl use; 3) development and implementation of a mitigation land management plan to address long-term ecological sustainability and maintenance of the site for burrowing owls; and 4) funding for the maintenance and management of mitigation land through the establishment of a long-term funding mechanism such as an endowment (CDFW, 2012).

Response G-5:

This is an excerpt from the Draft EIR. No further response is necessary.

May 1, 2023

Advocates for the Environment

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

Kevin Keith, Director of Planning
Ontario International Airport Authority
1923 East Avion Street
Ontario, CA 91761

Via U.S. Mail and email to kkeith@flyontario.com

re: Comments on Ontario International Airport South Airport Cargo Center Project,
SCH # 2021100226

Dear Mr. Keith:

Advocates for the Environment submits the comments in this letter regarding the Draft Environmental Impact Report (**DEIR**) for the Ontario International Airport South Airport Cargo Center Project (**Project**). The Project Site is located at 1923 East Avion Street within the City of Ontario (**City**), County of San Bernadino, and would affect 97 acres of land. The Project would include demolishing existing buildings and developing a new air cargo center, in two phases. We have reviewed the DEIR released in March 2023 and submit comments regarding the sufficiency of the DEIR's Greenhouse-Gas (**GHG**) analysis under the California Environmental Quality Act (**CEQA**). H-1

GHG Mitigation is Insufficient under CEQA

The calculated project-related emissions level is 128,057 metric tons of carbon dioxide equivalent (**MTCO2e**) per year. The lead agency concluded the Project would have significant GHG emissions even after all feasible mitigation is implemented. CEQA requires fair-share mitigation for significant cumulative impacts. (*Napa Citizens for Honest Gov't v. Napa County Board of Supervisors* (2001) 91 Cal.App.4th 342, 364.) Fair-share mitigation of greenhouse-gas (GHG) emissions requires mitigation down to zero, not just down to the CEQA baseline. H-2 H-3

To reduce the significant impact, the GHG mitigation section referred to Air Quality Mitigation Measures MM AQ-4 through MM AQ-7, and transportation mitigation measures TRANS-1 through TRANS-5. Many of these proposed measures are not likely to mitigate the GHG emissions from the Project, and despite an apparent availability of other GHG mitigation and Project alternatives, the DEIR declared that the Project's quantified emissions were unavoidable. Yet, this conclusion was not supported by substantial evidence. Because the mitigation measures the DEIR addressed are not sufficient to represent the project's fair share of emissions, and there are other readily available mitigation measures, the Project should be required to include more mitigation to reduce the Project's GHG impact to zero. H-4 H-5

10211 Sunland Blvd., Shadow Hills, CA 91040 (818) 650-0030 X101 dw@aenv.org

The EIR Identifies Ineffective and Insufficient Mitigation Measures

Mitigation measures need to be adequately analyzed and found "at least partially effective" by substantial evidence in order to be included as one of the Project's mitigation measures. (*King & Gardiner Farms, LLC v. Cnty. of Kern* (2020) 45 Cal. App. 5th 814, 865, 259.) The air quality mitigation measures identified as simultaneously reducing GHG impact are unlikely to lead to GHG reductions. Emissions regarding air quality (including but not limited to: Carbon Monoxide, Sulfur Dioxide, Ozone) are inherently different gases than GHG emissions (including but not limited to: Carbon Dioxide, Methane, Nitrous Oxide, Fluorinated Gases). While there may be some mitigation that could reduce emissions to simultaneously improve air quality and reduce GHG, most of the mitigation measures identified as GHG mitigation only apply to air quality with no likelihood of being even "partially effective" at reducing GHG emissions. Therefore, additional measures need to be adopted. (See "The Project's GHG Impacts Must be Fully Mitigated," below.) H-6

Vague and unenforceable mitigation measures violate CEQA (*California Clean Energy Comm. v. City of Woodland* (2014) 225 Cal. App. 4th 173, 180.) There is no showing that altogether, the mitigation measures will be partially effective, and some of them are improperly deferred. MM TRANS-1 lacks performance standards to ensure that the transportation programs would be effective, and is further limited by the structural and cultural limitations on carpooling and alternative modes of transportation that are not accurately reflected in this mitigation measure.[1] For similar reasons, MM TRANS-2 is limited by the reluctance to participate in ridesharing programs, and is not enforceable due to its voluntary nature.[2] Even incentivizing public transportation by providing free transit passes to employees is unlikely to substantially contribute to VMT and associated emissions because there is a social and cultural stigma against using public transportation and many find it inconvenient for non-monetary reasons.[3] Providing bicycle parking without ensuring that the surrounding area has infrastructure to support a safe bicycle commutes will likewise not contribute to a reduction in GHG emissions.[4] And while a van-pool service is a good idea, this mitigation measure is impermissibly deferred by not discussing sufficient details of the program.[5] Because the Project's electricity originates from GHG-intensive fossil fuels, MM AQ-4 does not reduce cumulative GHG H-7 H-8

[1] MM TRANS-1: "The proposed Project shall implement Voluntary Commute Trip Reduction (CTR) programs that discourage single- occupancy vehicle trips and encourage alternative modes of transportation, such as carpooling, taking transit, walking, and biking. Voluntary CTR programs shall include the following elements to apply the VMT reductions reported in literature…" (DEIR 1.0-80)
[2] MM TRANS-2: "A ridesharing program shall be implemented for employees of the site. The following elements designed to support the Project's ridesharing program…" (DEIR 1.0-80)
[3] MM TRANS-3: "Subsidized, discounted, or free Omnitrans, Metrolink or Amtrak transit passes shall be provided to employees to encourage use of transit routes/stops located less than a mile from the Project. It is assumed free transit passes are available to all employees." (DEIR 1.0-81)
[4] MM TRANS-4: "On-site bicycle parking and end-of-trip facilities shall be provided for employee use." (DEIR 1.0-81)
[5] MM TRANS-5: "An employer-sponsored vanpool service shall be implemented and be fully funded by the tenant" (DEIR 1.0-82)

emissions, but rather moves the location to the power plants instead of the Project site.[6] MM AQ-6 conflates the local impact of the heat island effect with the emission of greenhouse gases, thereby attempting to reduce an impact which does not actually reduce Project-related greenhouse gas emissions.[7] MM AQ-7 fails for vagueness, unenforceability, and lack of effect because merely encouraging single-engine taxi operations is not likely to contribute to actual changes in tenant behavior without some additional enforceable measure, and this mitigation measure does not specify the mechanism for which this will be "encouraged."[8] Ultimately, all of these mitigation measures should be revised to require the level of effectiveness required by CEQA, which is to the extent feasible.

H-8 cont'd

Infeasibility Finding Lacks Substantial Evidence

The conclusion that the Project will not be able to achieve any mitigation beyond which was identified in MM-AQ 4-7 and MM-TRANS 1-5 is not supported with substantial evidence. Overall, as discussed in the next section of this letter, there are abundant options available to mitigate emissions to the full extent of project emissions. The lead agency carries the burden of including an adequate discussion of feasible mitigation measures, including identifying the reasons for infeasibility, and the failure to do so here is a violation of CEQA and insufficient to meet the lead agency's burden.

First, the lead agency has the capacity to control the emissions directly and indirectly related to this project. The lead agency can limit the on-site vehicle emissions by ensuring that all of them adhere to the best available emissions control technology. To reduce GHGs, the lead agency could limit vehicles by prohibiting the use of diesel-powered machinery and vehicles and emphasizing or requiring Zero Emission Vehicle (**ZEV**) use on site. Primarily, the lead agency can make prospective tenants agree to maintain a hybrid, or even fully electrified vehicle fleet which powers itself through solar panels on the warehouse site. Requiring different fuel types would effectively emit less GHGs. For instance, if lease agreements included provisions to limit or prohibit the use of heavy-duty diesel, the mitigation would have at least some effects on GHGs. Requiring heavy duty vehicles to use alternative fuels such as gasoline, ethanol, or biofuels could have a notable effect on GHG emissions reductions. There are several measures, including solar panels, solar water heaters, automatic light switches, among many other mitigation strategies that can be incorporated to reduce non-mobile emissions. The lead agency could also commit to offsets or require the Applicant to enter into an agreement to buy clean power.

H-9

[6] MM AQ-4: "The Applicant shall require… on-site cargo- handling equipment, such as yard trucks, holsters, yard goats, pallet jacks, and similar equipment, to be electric, with the necessary electrical charging stations provided."
[7] MM AQ-6: "The Applicant shall include in the design requirements for the Project that a cool roof be installed at the parking structure to reduce energy use and urban heat island effects. This requirement shall not apply if solar panels are installed on the parking structure."
[8] MM AQ-7: "The Applicant shall encourage the use of single engine taxi operations for Project aircraft."

The Project's GHG Impacts Must be Fully Mitigated

Since the Project's GHG emissions would be significant, CEQA requires that the Project include fair-share mitigation (*Napa Citizens for Honest Gov't v. Napa County Board of Supervisors* (2001) 91 Cal.App.4th 342, 364.) Here, this means mitigation of the full extent of the Project's GHG impacts. The DEIR claims that no mitigation measures are feasible, beyond those described in the EIR. But that conclusion is incorrect, and not supported by substantial evidence.

The amount of GHG emissions that comprises the Project's fair share is clear. The EIR quantified the Project's annual emissions at 128,057 MTCO2e. Multiplying the annual emissions by the number of years the Project is anticipated to be in operation, which is probably 30 years, would be a good starting point from which to subtract the effect of non-offset mitigation measures, before implementing offset purchases.

H-10

Solar Panels Are Feasible

One of the most important feasible mitigation measures is installing solar panels or otherwise incorporating renewable energy production on-site, as to be less reliant on GHG-intense fuels which power the airport's energy system. This would also make some of the mitigation measures, like MM AQ-4, more effective because the electricity that powers the equipment would come from renewable energy on site. It would be readily achievable to install solar panels on the roof and there is no substantial evidence to indicate that none of the roof area could feasibly support solar panels. Industrial parking facilities and cargo sorting buildings such as these are likely to have considerable roof space conducive to solar panels, and likewise it should be feasible to install solar panels on the entire available surface. Installing solar panels would also make the identified mitigation measures more effective and increase GHG reductions overall.

H-11

Offsets Are Feasible

The lead agency did not consider offsets to mitigate the significant GHG impact. The lead agency has the authority to enter into a binding commitment with the Applicant to purchase or otherwise implement offsets. (*See King & Gardiner Farms, LLC v. Cnty. of Kern* (2020) 45 Cal. App. 5th 814, 852.) Several carbon registry programs undertake protocols which ensure that the offsets are being achieved, regardless of where they originate, and make lists publicly available for purchase. There are several offsets available, including but not limited to the California Deltaic and Coastal Wetland Restoration by the Nature Conservatory (Project ID ACR581), as well as five in-state Forest Carbon projects.[9]

H-12

Further, although CEQA does not restrict mitigation to local measures, some applicable plans for reducing GHG emissions emphasize a preference for on-site and local offsets, given the

[9] National Forest Foundation (Project ID ACR168), L.D O'Rourke Foundation (Project ID ACR672), and Ecotrust Forest Management, Inc. (Project IDs ACR732, ACR734 and ACR734).

community co-benefits.[10] The Project can create its own local or on-site measures to sequester GHG emissions or offset the Project emissions, such as a conservation easement or restoration to preserve and rehabilitate the surrounding project site and therefore sequester carbon emissions (*See Save the Hill Grp. v. City of Livermore* (2022) 76 Cal. App. 5th 1092, 1117.)[11]

H-12 cont'd

Since there is no explanation for why CEQA-compliant offsets are infeasible, the analysis presented in the DEIR is not supported by substantial evidence and the lead agency should require the Applicant to purchase offsets to the extent necessary to mitigate the Project's fair share of emissions.

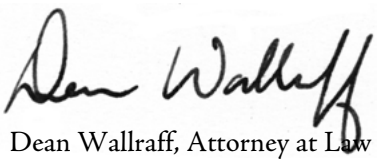
Conclusion

The EIR has concluded that the Project's GHG emissions will significant after mitigation, and so CEQA requires the lead agency to mitigate all of the Project's GHG impacts, but the DEIR fails to require this, in spite of the fact that there are feasible mitigation measures, alternatives, and offsets that should be considered, such as offsets or solar panels on site. The lead agency has not met its burden of showing that such measures are infeasible, and therefore the DEIR should be amended to reflect all feasible mitigation, as well as a reasonable range of project alternatives, to mitigate all the Project's "fair share" of GHG emissions.

H-13

Please put me on the interest list to receive updates about the progress of this project.

Sincerely,



Dean Wallraff, Attorney at Law
Executive Director, Advocates for the Environment

[10] A generally recognized hierarchy in mitigating GHG impacts is: 1) project design features/on-site mitigation, 2) local offsets, 3) State offsets, 4) US offsets, 5) International offsets. (*See, e.g., Sierra Club v. Cnty. of San Diego*, No. D077548, 2021 WL 6050624, at *11 (Cal. Ct. App. Dec. 21, 2021.)

[11] Nahlik, A., Fennessy, M. Carbon storage in US wetlands. Nat Commun 7, 13835 at 2 (2016). https://doi.org/10.1038/ncomms13835. https://rdcu.be/cOjBW ("[W]etlands can accumulate large carbon stores, making them an important sink for atmospheric carbon dioxide and holding up to or, in some cases, even more than 40% soil carbon, which is substantially greater than the 0.5–2% carbon commonly found in agricultural soils").

COMMENT LETTER H

Advocates for the Environment
Dean Wallraff, Executive Director
May 1, 2023

Comment H-1:

Advocates for the Environment submits the comments in this letter regarding the Draft Environmental Impact Report (DEIR) for the Ontario International Airport South Airport Cargo Center Project (Project). The Project Site is located at 1923 East Avion Street within the City of Ontario (City), County of San Bernadino, and would affect 97 acres of land. The Project would include demolishing existing buildings and developing a new air cargo center, in two phases. We have reviewed the DEIR released in March 2023 and submit comments regarding the sufficiency of the DEIR's Greenhouse-Gas (GHG) analysis under the California Environmental Quality Act (CEQA).

Response H-1:

This introductory comment provides a brief description of the proposed Project. The comment does not raise any questions regarding specific aspects of the GHG analysis for the proposed Project and therefore no further response is provided.

Comment H-2:

The calculated project-related emissions level is 128,057 metric tons of carbon dioxide equivalent (MTCO2e) per year. The lead agency concluded the Project would have significant GHG emissions even after all feasible mitigation is implemented.

Response H-2:

This comment is generally correct. For clarity, as discussed in Section 5.7: Greenhouse Gas Emissions in the Draft EIR, specifically Table 5.7-6, and the *Air Quality Technical Report* (Appendix 5.2-1 of the Draft EIR), the proposed Project's construction and operations would result in GHG emissions of 79,798 $MTCO_2e$ annually for Phase 1 and 128,057 $MTCO_2e$ annually for Phases 1 and 2 combined (*i.e.*, the overall Project). Aircraft accounts for approximately 78 percent of the total GHG emissions for Phase 1 (62,283 $MTCO_2e$ annually) and approximately 80 percent of the total GHG emissions for Phases 1 and 2 combined (103,019 $MTCO_2e$ annually).

Comment H-3:

CEQA requires fair-share mitigation for significant cumulative impacts. (*Napa Citizens for Honest Gov't v. Napa County Board of Supervisors* (2001) 91 Cal.App.4th 342, 364.) Fair-share mitigation of greenhouse-gas (GHG) emissions requires mitigation down to zero, not just down to the CEQA baseline.

Response H-3:

Based on review of the cited court decision, the first sentence of the comment appears to indirectly refer to Section 15130(a)(3) of the CEQA Guidelines, which in full states as follows:

> *"3) An EIR may determine that a project's contribution to a significant cumulative impact will be rendered less than cumulatively considerable and thus is not significant. A project's contribution is less than cumulatively considerable if the project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact. The lead agency shall identify facts and analysis supporting its conclusion that the contribution will be rendered less than cumulatively considerable."*[17]

A plain reading of Section 15130(a)(3) indicates that the CEQA Guidelines discuss fair-share mitigation in the context of substantiating that a project's cumulative impacts would be less than cumulatively considerable and, therefore, less than significant. Here, however, Section 5.7.4 in the Draft EIR does not conclude cumulative impacts related to GHG emissions would be less than cumulatively considerable and not significant. To the contrary, the Draft EIR states the proposed Project would result in a significant and unavoidable impact related to GHG emissions; hence, the proposed Project's incremental contribution of GHG emissions, both before and after mitigation, is considered to be cumulatively considerable.

To some extent, the comment appears to confusingly conflate CEQA's rubric for mitigating cumulative impacts with the separate rubric for evaluating the significance of GHG emissions, as set forth in CEQA Guidelines Section 15064.4. Nothing in Section 15064.4 requires the application of a zero emissions threshold that, in turn, would require emissions to be mitigated to zero under the fair-share mitigation construction of Section 15130. Rather, Section 15064.4(b)(1) provides that OIAA "should consider" the extent to which the Project "may

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17 California Public Resources Code (PRC). *CEQA Guidelines*. Section 15130(a)(3). https://www.califaep.org/docs/CEQA_Handbook_2023_final.pdf. Accessed May 2023.

increase or reduce [GHG] emissions as compared to the existing environmental setting." Page 5.7-30 in the Draft EIR demonstrates the analysis' consistency with Section 15064.4 and discloses that "the criterion used in this analysis is whether Project construction and operations would result in a net increase in GHG emissions over Baseline Conditions."

More generally, contrary to the second sentence of the comment, for which the commenter provides no authority in support, neither the CEQA statute nor the CEQA Guidelines require a significant GHG impact to be mitigated to zero. Rather, they require that, when an agency approves a project, it must adopt feasible mitigation measures that will avoid or substantially lessen the project's significant environmental effects.[18] An EIR may include mitigation measures that will reduce but not fully mitigate a significant environmental impact. See, e.g., *Save the Hill Group v. City of Livermore*, 76 Cal. App. 5th 1092, 1117 (2022).

Comment H-4:

To reduce the significant impact, the GHG mitigation section referred to Air Quality Mitigation Measures MM AQ-4 through MM AQ-7, and transportation mitigation measures TRANS-1 through TRANS-5. Many of these proposed measures are not likely to mitigate the GHG emissions from the Project, and despite an apparent availability of other GHG mitigation and Project alternatives, the DEIR declared that the Project's quantified emissions were unavoidable.

Response H-4:

The comment is correct that the Draft EIR incorporates mitigation measures MM AQ-4 through AQ-7 and MM TRANS-1 through TRANS-5, which would partially mitigate the Project's GHG impact, but not to a less-than-significant level. In addition, as discussed in Section 5.7: Greenhouse Gas Emissions in the Draft EIR, the Project also incorporates Project Design Features PDFs AQ-2 through AQ-5, AQ-7, AQ-8, and PDFs GHG-1 and GHG-2, which would also reduce the Project's GHG emissions.

Regarding the comment that many of the proposed mitigation measures are unlikely to mitigate the Project's GHG emissions, please see **Responses to Comments H-6**, **H-7,** and **H-8** below. As discussed therein, contrary to the comment, the referenced mitigation measures would effectively reduce the Project-related generation of GHG emissions. In addition, it is noted that most of the projected GHG emissions relate to the operation of the aircraft associated with the Project. As stated on pages 5.7-38 and 5.2-36 in the Draft EIR, OIAA does not have the authority

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18 PRC. § 21002; *CEQA Guidelines* § 15091(a)(1). https://www.califaep.org/docs/CEQA_Handbook_2023_final.pdf. Accessed May 2023.

to regulate aircraft operations or emissions from aircraft engines. For this reason, it is infeasible for OIAA to require mitigation of the aircraft emissions. As a result, other than the new mitigation measures described in **Topical Response 1: Sustainable Project Design Features and Mitigation Measures** above, there are no additional feasible mitigation measures that would substantially lessen the Project's GHG emissions and this impact would therefore be significant and unavoidable, as determined in the Draft EIR. See **Topical Response 1: Sustainable Project Design Features and Mitigation Measures**, above, for discussion of the project design features and mitigation measures that would reduce the Project's GHG emissions to the extent feasible.

Comment H-5:

Yet, this conclusion was not supported by substantial evidence. Because the mitigation measures the DEIR addressed are not sufficient to represent the project's fair share of emissions, and there are other readily available mitigation measures, the Project should be required to include more mitigation to reduce the Project's GHG impact to zero.

Response H-5:

See **Responses to Comments H-3** and **H-4**, above, and **H-7** through **H-12**, below. In addition, please see **Topical Response 1: Sustainable Project Design Features and Mitigation Measures**, above, for additional discussion on the incorporation of all feasible mitigation measures into the Project.

Comment H-6:

Mitigation measures need to be adequately analyzed and found "at least partially effective" by substantial evidence in order to be included as one of the Project's mitigation measures. (*King & Gardiner Farms, LLC v. Cnty. of Kern* (2020) 45 Cal. App. 5th 814, 865, 259.) The air quality mitigation measures identified as simultaneously reducing GHG impact are unlikely to lead to GHG reductions. Emissions regarding air quality (including but not limited to: Carbon Monoxide, Sulfur Dioxide, Ozone) are inherently different gases than GHG emissions (including but not limited to: Carbon Dioxide, Methane, Nitrous Oxide, Fluorinated Gases). While there may be some mitigation that could reduce emissions to simultaneously improve air quality and reduce GHG, most of the mitigation measures identified as GHG mitigation only apply to air quality with no likelihood of being even "partially effective" at reducing GHG emissions. Therefore, additional measures need to be adopted. (See "The Project's GHG Impacts Must be Fully Mitigated," below.)

Response H-6:

The comment claims that MM AQ-1 through AQ-7 are unlikely to lead to reductions in the proposed Project's GHG emissions, although it does not specify why these mitigation measures

would not be at least partially effective to reduce GHG emissions. The nexus between the cited Mitigation Measures and GHG emissions reduction is supported by substantial evidence, as explained below:

- MM AQ-1 requires the Applicant to meet certain trucking specifications that result in the use of cleaner equipment during the Project's construction phase, which reduces GHG emissions associated with fossil fuel combustion.
- MM AQ-2 requires the Applicant to use specified electric or alternative-fueled equipment and pole power in lieu of generators during the Project's construction phase, which would reduce and avoid GHG emissions associated with fossil fuel combustion.
- MM AQ-3 requires the Applicant to support and encourage ridesharing and transit incentives for the construction crew during the Project's construction phases where feasible, which would reduce and avoid GHG emissions associated with fossil fuel combustion.
- MM AQ-4 requires the Applicant to utilize electric cargo-handling on the Project site for Project operation, which would reduce and avoid GHG emissions associated with fossil fuel combustion. In addition, please see **Response to Comment H-8**, below.
- MM AQ-5 requires the Applicant to utilize zero-emission delivery trucks within specified portions of its vehicle fleet for Project operation as feasible, which would reduce and avoid GHG emissions associated with fossil fuel combustion.
- MM AQ-6 requires the Applicant to deploy building design standards intended to minimize urban heat island effects, which would reduce GHG emissions by lessening the Project's consumption of energy to meet building cooling needs.
- MM AQ-7 requires the Applicant to encourage the use of single-engine taxi operations for Project aircraft, which would reduce GHG emissions associated with the combustion of aircraft fuel during the taxi portion of the landing-takeoff cycle.

In addition, as discussed in **Response to Comment H-4**, given the percentage of GHG emissions from proposed Project aircraft emissions (which the OIAA does not have the authority to regulate[19]), there are no additional feasible mitigation measures that would reduce the Project's GHG emissions to below significance and the impact is therefore significant and unavoidable. The Draft EIR included MM AQ-1 through AQ-7, and MM TRANS-1 through TRANS-5, to reduce

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19 Section 233 of the federal Clean Air Act exclusively vests the authority to promulgate emission standards for aircraft and aircraft engines with the USEPA; states and other municipalities are preempted from adopting or enforcing any standard with respect to aircraft engine emissions unless such standard is identical to USEPA standards.

the Project's GHG emissions to the extent feasible. The majority of the GHG emissions associated with the Project would be generated by aircraft operations and the federal Clean Air Act exclusively vests the authority to promulgate emission standards for aircraft and aircraft engines with the United States Environmental Protection Agency (USEPA); states and other municipalities are preempted from adopting or enforcing any standard with respect to aircraft engine emissions unless such standard is identical to USEPA standards. For these reasons, with the exception of the new mitigation measures identified in **Topical Response 1: Sustainable Project Design Features and Mitigation Measures**, above, there are no additional feasible mitigation measures can be adopted that would substantially reduce the Project's GHG emissions.

Comment H-7:

Vague and unenforceable mitigation measures violate CEQA (*California Clean Energy Comm. v. City of Woodland* (2014) 225 Cal. App. 4th 173, 180.) There is no showing that altogether, the mitigation measures will be partially effective, and some of them are improperly deferred. MM TRANS-1 lacks performance standards to ensure that the transportation programs would be effective, and is further limited by the structural and cultural limitations on carpooling and alternative modes of transportation that are not accurately reflected in this mitigation measure. For similar reasons, MM TRANS-2 is limited by the reluctance to participate in ridesharing programs, and is not enforceable due to its voluntary nature. Even incentivizing public transportation by providing free transit passes to employees is unlikely to substantially contribute to VMT and associated emissions because there is a social and cultural stigma against using public transportation and many find it inconvenient for non-monetary reasons. Providing bicycle parking without ensuring that the surrounding area has infrastructure to support a safe bicycle commutes will likewise not contribute to a reduction in GHG emissions.

Response H-7:

The comments are not supported by citation to any authority and appear to be the personal views of the commenter. Contrary to the comments, the transportation mitigation measures in the Draft EIR are effective and do not improperly defer actions. The effectiveness of Mitigation Measures MM TRANS-1 through TRANS-5 are discussed on page 5.12-65 of the Draft EIR, as well as page 58 of the *Transportation Impact Study* (Appendix 5.12-1 to the Draft EIR). That study concludes that, because the City of Ontario is not a dense urban environment, access to transit is limited for the employee shifts, and due to duplicative dampening, the reduction in VMT that is anticipated to result from implementation of the programs required in Mitigation Measures

MM TRANS-1, TRANS-2 and TRANS-3 is 5.10 percent.[20] Reducing VMT would result in some reduction of the Project's GHG emissions because reduced VMT serves to reduce and avoid GHG emissions associated with fossil fuel combustion.

With respect to the comment that providing free transit passes, as required by MM TRANS-3, would likely be ineffective due to the "social and cultural stigma against using public transportation and many find it inconvenient," that is speculation on the commenter's part and inconsistent with the wide use of public transit in Southern California and throughout the nation.

With respect to MM TRANS-4, bicycle facilities and infrastructure were discussed in Section 5.12 of the Draft EIR. Class II Bike Lanes and Class III Bike Routes are located north of the Project site along Inland Empire Boulevard and G Street. The West Cucamonga Creek Flood Control Channel has an existing Class I Bike Path located south of the Project site from Mission Boulevard to Philadelphia Street between Grove Avenue and Baker Avenue. With these bicycle facilities and infrastructure existing and planned in the vicinity of the proposed Project, providing bicycle facilities onsite in accordance with MM TRANS-4 would contribute to a reduction in the Project's GHG emissions.

Furthermore, Mitigation Measures MM TRANS-1 through TRANS-5 are consistent with the recommended guidance and elements for VMT reduction strategies contained in the Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity (California Air Pollution Control Officers Association (CAPCOA), 2021. The *2021 CAPCOA Handbook* is a leading recognized industry source for guidance on VMT reduction measures as it was prepared, among other contributors, by multiple California public agencies, including many Air Quality Management Districts and Air Pollution Control Districts. (The *2021 CAPCOA Handbook* is incorporated by reference into this response to the comment and can be accessed at: Handbook Public Draft_2021-Aug.pdf (airquality.org).)

Page 76 of the *2021 CAPCOA Handbook* states that a voluntary commute trip reduction (CTR) program that includes the elements of Mitigation Measures MM TRANS-1 through TRANS-5 recommended in the Draft EIR, including MM TRANS-1 involving information, coordination and marketing for CTR services, infrastructure, and incentives, can apply the VMT reductions reported in the *2021 CAPCOA Handbook* and cited literature.

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20 OIAA. *Ontario International Airport South Airport Cargo Center Project Draft Environmental Impact Report*. SCH Number 2021100226. Appendix 5.12. *Traffic Study*. Table 11: VMT Mitigation Options. Page 58. https://www.flyontario.com/our-neighbors/environment. Accessed May 2023.

All VMT reduction strategies and calculations related to MM TRANS-1 through TRANS-5 utilized the methodologies described in the *2021 CAPCOA Handbook* as discussed on page 5.12-65 in the Draft EIR, as well as page 58 in the *Transportation Impact Study* (Appendix 5.12-1 to the Draft EIR).

Comment H-8:

And while a van-pool service is a good idea, this mitigation measure is impermissibly deferred by not discussing sufficient details of the program. Because the Project's electricity originates from GHG-intensive fossil fuels, MM AQ-4 does not reduce cumulative GHG emissions, but rather moves the location to the power plants instead of the Project site. MM AQ-6 conflates the local impact of the heat island effect with the emission of greenhouse gases, thereby attempting to reduce an impact which does not actually reduce Project-related greenhouse gas emissions. MM AQ-7 fails for vagueness, unenforceability, and lack of effect because merely encouraging single-engine taxi operations is not likely to contribute to actual changes in tenant behavior without some additional enforceable measure, and this mitigation measure does not specify the mechanism for which this will be "encouraged." Ultimately, all of these mitigation measures should be revised to require the level of effectiveness required by CEQA, which is to the extent feasible.

Response H-8:

Each of the mitigation measures referenced in the comment would be effective at reducing the proposed Project's GHG emissions inventory as discussed below.

The voluntary vanpool service the comment discusses is described in detail in MM TRANS-5 (Employer-Sponsored Vanpool Program), which requires the employer-sponsored vanpool service be fully funded by the tenant and includes the following details:

- Provide a minimum of one (1) and up to three (3) vanpool vehicles and associated parking with designated passenger loading/unloading area near employee entrance.
- Pay for the lease of a minimum of one (1) van and up to three (3) vans for the purpose of employee vanpooling.
- A ten percent voluntary participation rate is assumed to be the high end of the range for this project.

With these specific components, the voluntary vanpool service program is discussed in sufficient detail in the mitigation measure.

Furthermore, MM TRANS-5 is consistent with the recommended guidance and elements for VMT reduction strategies regarding such vanpool programs, as set forth on pages 97-101 of the *2021 CAPCOA Handbook*. As noted above, the *2021 CAPCOA Handbook* is a leading recognized industry source for guidance on VMT reduction measures.

Page 76 of the *2021 CAPCOA Handbook* states that a voluntary CTR program that includes the elements of MM TRANS-1 (involving information, coordination, and marketing for CRT services, infrastructure, and incentives) and MM TRANS-5 can apply the VMT reductions reported in the *2021 CAPCOA Handbook* and cited literature.

Again, all VMT reduction strategies related to MM TRANS-5 utilized the methodologies described in the *2021 CAPCOA Handbook* as discussed on page 5.12-65 in the Draft EIR, as well as page 58 in the *Traffic Study* (Appendix 5.12-1 to the Draft EIR).

With respect to MM AQ-4, it states that the Applicant shall require GSE and all other on-site cargo-handling equipment and similar equipment to be electric with the necessary electrical charging stations provided. The comment claims that requiring electric cargo-handling and similar equipment would not reduce cumulative GHG emissions but move them to power plants. However, the commenter's subsequent comments belies this claim.

Specifically, in **Comment H-9**, below, the commenter states that:

> *"[t]o reduce GHGs, the lead agency could limit vehicles by prohibiting the use of diesel-powered machinery and vehicles and emphasizing or requiring Zero Emission Vehicle (ZEV) use on site. Primarily, the lead agency can make prospective tenants agree to maintain a hybrid, or even fully electrified vehicle fleet which powers itself through solar panels on the warehouse site."*[21]

As discussed in **Topical Response 1: Sustainable Project Design Features and Mitigation Measures** and **Response to Comment H-9**, the Draft EIR includes a variety of project design features and mitigation measures that require these project elements, which the commenter acknowledges (in **Comment H-9**) would reduce the Project's GHG emissions. As one example, as discussed on page 3.0-29 in the Draft EIR, the proposed Project originally included a 1.5-Megawatt Solar PV Panel system on the rooftops of the Air Cargo Sort Building and parking garage. As discussed in **Response to Comment H-9**, the capacity of the Solar PV Panel system

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21 Advocates for the Environment. *Comments on Ontario International Airport South Airport Cargo Center Project, SCH # 2021100226*. May 1, 2023.

has been increased from 1.5 Megawatts to 3.8 Megawatts (see **Section 2.0: Additions and Corrections** in this Final EIR), which would further contribute to powering the proposed facility with renewable energy. Therefore, as the commenter recognizes, the mitigation measures in the Draft EIR, including MM AQ-4, would effectively reduce GHG emissions, although not to a less-than-significant level.

With respect to the commenter's statement that MM AQ-4 does not reduce GHG emissions "but rather moves the location [of the emissions] to the power plants instead of the Project site," the shift from the combustion of fossil fuels within individual internal-combustion engines to the consumption of grid energy by electric vehicles is the pivot being deployed by the State of California to reduce GHG emissions through fleet turnover and electrification. Indeed, it is generally accepted that, due to programs like, for example, California's Renewables Portfolio Standard, GHG emissions are reduced with this change because consumption of electricity by the transportation fleet is cleaner and less GHG intensive than the consumption of traditional petroleum fuels.[22]

MM AQ-6 includes design requirements for a cool roof to be installed at the parking structure, but specifies that this requirement would not apply if solar panels are installed on the parking structure. As discussed previously, the Project's Solar PV Panel system has been increased from 1.5 Megawatts to 3.8 Megawatts, which would occupy all available space on the rooftop of the parking structure, as well as the entire rooftop of the Air Cargo Sort Building. Therefore, the requirement for a cool roof only applies to the proposed maintenance buildings and MM AQ-6 has been modified in the Final EIR to reflect this, as shown in **Table TR-1** in **Topical Response 1: Sustainable Project Design Features and Mitigation Measures**.

Finally, as discussed in **Response to Comment H-2** and stated on page 5.7-38 and page 5.2-36 in the Draft EIR, OIAA does not have the authority to regulate aircraft operations or emissions from aircraft engines.[23] For this reason, it is infeasible to require mitigation for those sources.

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22 E.g., in the *2020 Mobile Source Strategy* (dated October 28, 2021) (page 91), CARB reported a "large incremental improvement in emissions per vehicle from electrification;" as such, the strategies evaluated in that document "focus on aggressively moving to all-electric technologies, coupled with increases in conventional vehicle improvements." See also CARB's *2022 Scoping Plan for Achieving Carbon Neutrality* (dated November 16, 2022) [underscoring need for transportation electrification as supported by electric grid].

23 Section 233 of the federal Clean Air Act exclusively vests the authority to promulgate emission standards for aircraft and aircraft engines with the USEPA; states and other municipalities are preempted from adopting or enforcing any standard with respect to aircraft engine emissions unless such standard is identical to USEPA standards.

However, to reduce engine taxi operations which would result in decreased GHG emissions, the Draft EIR includes MM AQ-7, which requires the Applicant to encourage the use of single-taxi operations for Project aircraft.

Comment H-9:

The conclusion that the Project will not be able to achieve any mitigation beyond which was identified in MM-AQ 4-7 and MM-TRANS 1-5 is not supported with substantial evidence. Overall, as discussed in the next section of this letter, there are abundant options available to mitigate emissions to the full extent of project emissions. The lead agency carries the burden of including an adequate discussion of feasible mitigation measures, including identifying the reasons for infeasibility, and the failure to do so here is a violation of CEQA and insufficient to meet the lead agency's burden. First, the lead agency has the capacity to control the emissions directly and indirectly related to this project. The lead agency can limit the on-site vehicle emissions by ensuring that all of them adhere to the best available emissions control technology. To reduce GHGs, the lead agency could limit vehicles by prohibiting the use of diesel-powered machinery and vehicles and emphasizing or requiring Zero Emission Vehicle (ZEV) use on site. Primarily, the lead agency can make prospective tenants agree to maintain a hybrid, or even fully electrified vehicle fleet which powers itself through solar panels on the warehouse site. Requiring different fuel types would effectively emit less GHGs. For instance, if lease agreements included provisions to limit or prohibit the use of heavy-duty diesel, the mitigation would have at least some effects on GHGs. Requiring heavy duty vehicles to use alternative fuels such as gasoline, ethanol, or biofuels could have a notable effect on GHG emissions reductions. There are several measures, including solar panels, solar water heaters, automatic light switches, among many other mitigation strategies that can be incorporated to reduce non-mobile emissions. The lead agency could also commit to offsets or require the Applicant to enter into an agreement to buy clean power.

Response H-9:

As discussed in **Responses to Comments H-2** and **H-4**, the Draft EIR has incorporated MM AQ-1 through AQ-7, and MM TRANS-1 through TRANS-5 to reduce GHG emissions from other Project sources. However, given that most of the GHG emissions associated with the Project would result from aircraft emissions and OIAA has no authority to regulate aircraft operations or emissions from aircraft engines, there are no additional feasible mitigation measures that would substantially lessen the proposed Project's GHG emissions, so the Project's GHG impact would be significant and unavoidable.

With respect to the comments regarding the lead agency's ability to limit on-site Project emissions from vehicles and machinery and other heavy-duty vehicles, see **Topical Response 1: GHG and Air Quality Mitigation Measures**.

In addition, as discussed in **Table C-3: SCAQMD Reference Documents Measures** in **Responses to Comment Letter C**, following the review of potential additional project design features and mitigation measures referenced by the SCAQMD in its comment letter on the Draft EIR, PDFs AQ-1 and GHG-2 have been augmented and several new air quality PDFs have been added in the Final EIR. Furthermore, several additional, feasible mitigation measures have been added in the Final EIR (see **Section 2.0: Additions and Corrections** and **Table TR-1** in **Topical Response 1: Sustainable Project Design Features and Mitigation Measures**) that would further mitigate the Project's GHG emissions.

With respect to the commenter's suggestion that the Project could include solar panels, as discussed on page 3.0-29 in the Draft EIR, the proposed Project originally included a 1.5-Megawatt Solar PV Panel system on the rooftops of the Air Cargo Sort Building and the parking structure, consistent with PDF GHG-2. Furthermore, as discussed in the Final EIR (see **Section 2.0: Additions and Corrections**), the capacity of the Solar PV Panel system has been increased from 1.5 Megawatts to 3.8 Megawatts, which would now occupy all available space on the rooftops of the Air Cargo Sort Building and the parking structure. As discussed in **Topical Response 1: Sustainable Project Design Features and Mitigation Measures,** with this increase in capacity, the Project's GHG emission reductions with respect to the inclusion of the solar panel system would increase from approximately 3,750 metric tons to approximately 9,450 metric tons.[24]

Comment H-10:

Since the Project's GHG emissions would be significant, CEQA requires that the Project include fair-share mitigation (*Napa Citizens for Honest Gov't v. Napa County Board of Supervisors* (2001) 91 Cal.App.4th 342, 364.) Here, this means mitigation of the full extent of the Project's GHG impacts. The DEIR claims that no mitigation measures are feasible, beyond those described in the EIR. But that conclusion is incorrect, and not supported by substantial evidence. The amount of GHG emissions that comprises the Project's fair share is clear. The EIR quantified the Project's annual emissions at 128,057 MTCO2e. Multiplying the annual emissions by the number of years

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24 Briefly, these amounts were calculated as follows: (a) with respect to the original 1.5 Megawatt system, 626 lbs CO_2e/MWh x 1.5 MWh x 8,760 hours/2,000 lbs/ton x 0.907185 metric tons/ton = 3,731 metric tons, and (b) with respect to the expanded 3.8 Megawatt system, 626 lbs CO_2e/MWh x 3.8 MWh x 8,760 hours/2,000 lbs/ton x 0.907185 metric tons/ton = 9,452 metric tons.

the Project is anticipated to be in operation, which is probably 30 years, would be a good starting point from which to subtract the effect of non-offset mitigation measures, before implementing offset purchases.

Response H-10;

With respect to the comment that the Project included fair-share mitigation, see **Response to Comment H-3**, above. Regarding the feasible mitigation for the Project's GHG emissions, see **Topical Response 1: Sustainable Project Design Features and Mitigation Measures** and **Responses to Comments H-3** through **H-9**, above. As illustrated therein, and in prior responses, the suite of PDFs and mitigation measures identified in the Draft EIR, as modified and clarified in the Final EIR, comprehensively address feasible emission reduction opportunities for the Project-related emission sources that are not subject to principles of federal preemption.

It also is noted that, consistent with existing standards of practice used by CEQA analysts, the proposed Project's GHG emissions are reported in Section 5.7: Greenhouse Gas Emissions in the Draft EIR for the two milestone years affiliated with implementation of the Project: completion of Phase 1 (2025) and completion of Phase 2 (2029). The comment is correct that the proposed Project's GHG emissions would continue on an annual basis into the future. Indeed, the Draft EIR considered the proposed Project's consistency with post-2029 emission reduction targets and policies of the State of California for this very reason (see Draft EIR, pages 5.7-38 through 5.7-44). However, the comment is incorrect to the extent it implies that the GHG emissions inventory reported in the Draft EIR for the proposed Project in Table 5.7-6 would remain static for the foreseeable future. Rather, it is reasonably foreseeable that the GHG emissions inventory reported in the Draft EIR would be subject to decline over time as federal, State, and local governments continue to pursue GHG-reducing policies and market demands spur technological innovation and advancements relating to the Project's GHG-emitting sources.

As to the comment regarding the calculation of the Project's GHG emissions and the potential for carbon offsets, see **Response to Comment H-12**, which identifies various constraints that render that suggestion infeasible.

Comment H-11:

One of the most important feasible mitigation measures is installing solar panels or otherwise incorporating renewable energy production on-site, as to be less reliant on GHG-intense fuels which power the airport's energy system. This would also make some of the mitigation measures, like MM AQ-4, more effective because the electricity that powers the equipment would come from renewable energy on site. It would be readily achievable to install solar panels on the roof and there is no substantial evidence to indicate that none of the roof area could feasibly support

solar panels. Industrial parking facilities and cargo sorting buildings such as these are likely to have considerable roof space conducive to solar panels, and likewise it should be feasible to install solar panels on the entire available surface. Installing solar panels would also make the identified mitigation measures more effective and increase GHG reductions overall.

Response H-11:

Please see **Response to Comment H-9** above, which discusses the Project's utilization of solar panels to generate renewable energy.

Comment H-12:

The lead agency did not consider offsets to mitigate the significant GHG impact. The lead agency has the authority to enter into a binding commitment with the Applicant to purchase or otherwise implement offsets. (See *King & Gardiner Farms, LLC v. Cnty. of Kern* (2020) 45 Cal. App. 5th 814, 852.) Several carbon registry programs undertake protocols which ensure that the offsets are being achieved, regardless of where they originate, and make lists publicly available for purchase. There are several offsets available, including but not limited to the California Deltaic and Coastal Wetland Restoration by the Nature Conservatory (Project ID ACR581), as well as five in-state Forest Carbon projects.9 Further, although CEQA does not restrict mitigation to local measures, some applicable plans for reducing GHG emissions emphasize a preference for on-site and local offsets, given the community co-benefits.10 The Project can create its own local or on-site measures to sequester GHG emissions or offset the Project emissions, such as a conservation easement or restoration to preserve and rehabilitate the surrounding project site and therefore sequester carbon emissions (*See Save the Hill Grp. v. City of Livermore* (2022) 76 Cal. App. 5th 1092, 1117.)11 Since there is no explanation for why CEQA-compliant offsets are infeasible, the analysis presented in the DEIR is not supported by substantial evidence and the lead agency should require the Applicant to purchase offsets to the extent necessary to mitigate the Project's fair share of emissions.

Response H-12:

The comment begins by speculating that OIAA did not consider offsets as a potential GHG mitigation strategy prior to publication of the Draft EIR. However, the CEQA practitioners responsible for preparation of the Draft EIR and its supporting technical analyses did consider offsets under the general framework established in CEQA Guidelines Section 15126.4(c) for the mitigation of GHG emissions. The CEQA practitioners concluded that offsets would not be feasible for the proposed Project due for the following reasons: the continuing controversy surrounding the use and structure of offsets following 2020 *Golden Door* court decision (summarized below); the absence of any Statewide, regional, or local program developed for their use in any context other than Cap-and-Trade Program offsets that the Applicant could

participate in; the absence of sufficient credit volume in the California offset marketplace; and the focused purpose and objective of OIAA as an airport operator/proprietor, which significantly limits the ability of OIAA to independently establish an offset program and implementing protocols of its own. Nothing in CEQA required the Draft EIR "to explain why certain mitigation measures are infeasible" (*Clover Valley Foundation v. City of Rocklin (Clover Valley)*, 197 Cal. App. 4th 200, 245 (2011)) nor "analyze in detail mitigation measures it concludes are infeasible" (*Cherry Valley Pass Acres & Neighbors v. City of Beaumont*, 190 Cal. App. 4th 316, 351 [2010]). In response to this comment, however, further information and explanation are provided below.

The comment suggests that offsets are feasible mitigation with respect to the significant GHG impact identified for the proposed Project, and that the lead agency must require the Applicant to "purchase or otherwise implement offsets" to mitigate that significant impact. As explained below, the commenter is incorrect that the mere existence of offset registries, even if approved by the California Air Resources Board (CARB), is sufficient for the lead agency to include the purchase or implementation of offsets as a CEQA-compliant mitigation measure. While offsets are discussed in CEQA Guidelines Section 15126.4(c)(3) and CARB's *2022 Scoping Plan* as a possibility for mitigating GHG impacts, the use of such offsets would be improper here, consistent with the recent appellate decision in *Golden Door Properties, LLC v. County of San Diego* (*Golden Door*), 50 Cal. App. 5th 467 (2020).[25]

As background, the *Golden Door* decision sets forth criteria for lead agencies to meet in order to apply GHG offsets as a CEQA mitigation measure. In *Golden Door*, the court held that a GHG offset mitigation measure (designated as M-GHG-1) adopted by the County of San Diego was invalid and unlawful because, among other reasons, the county had not established protocols equivalent to CARB's Cap-and-Trade Program offsets or included any such protocols in M-GHG-1.

In considering whether M-GHG-1 was equivalent to a Cap-and-Trade Program offset, the court noted that such offsets "may only be issued when the emission reduction achieved is real,

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25 The comment refers to *King & Gardiner Farms, LLC v. County of Kern,* 45 Cal. App. 5th 814, 852 (2020), for the proposition that OIAA "has the authority to enter into a binding commitment with the Applicant to purchase or otherwise implement offsets." In response, it is noted that the *King & Gardiner Farms* decision does not address the purchase or implementation of offsets to reduce or avoid GHG emissions. The topic areas evaluated in that decision primarily concern water supply and agricultural resources.

permanent, quantifiable, verifiable, enforceable, and additional."[26] These requirements are embedded in CARB's Compliance Offset Protocols, which the *Golden Door* court noted "are the heart of cap-and-trade offsets . . . ." *Id.* at 507-509, 512. "Protocols are the formalized procedures for accounting for credits that ensure the credits are an accurate and reliable representation of emission reductions that actually occurred. Protocols 'qualify and quantify GHG destruction, ongoing GHG reductions or GHG removal enhancements achieved by an offset project.'" *Id.* at 507-508.

The court in *Golden Door* compared the stringent protocols adopted by CARB pursuant to its Cap-and-Trade Program with the framework set forth in M-GHG-1 and determined that the county's mitigation measure did not establish equivalent protections. Of particular importance, the court found that the county had not established protocols to determine whether M-GHG-1 would in fact achieve real, permanent, quantifiable, verifiable and enforceable offsets. M-GHG-1 required the purchase of offsets through CARB-approved registries, but that was insufficient. The county also had to establish and approve the protocols itself and had not done so. *Id.* at 511. The court rejected the county's argument that the registries would ensure the validity of the offsets. *Id* at 512. The court also emphasized that a proposed protocol cannot be approved by a public agency unless the approval is preceded by public notice, a comment period and a public hearing, similar to the rulemaking process required prior to CARB's approval of a Cap-and-Trade Program protocol. *Id.*

The comment makes no reference to the *Golden Door* decision and suggests that OIAA can impose a GHG offset mitigation measure by selecting a carbon registry program that will "undertake protocols which ensure that the offsets are being achieved, regardless of where they originate, and make lists publicly available for purchase," and that several such registries are

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26 "'Real' means that "the GHG reductions must result from a demonstrable action or set of actions; be quantified using appropriate, accurate, and conservative methodologies that account for all GHG emissions sources, GHG sinks, and GHG reservoirs within the offset project boundary and account for uncertainty and the potential for activity-shifting leakage and market shifting leakage." (Cal. Code Regs., tit. 17, § 95802.) "'Permanent' means that GHG reductions are not reversible, or when [they] may be reversible, that mechanisms must be in place to replace any reversed GHG emission reductions to ensure that all credited reductions endure for at least 100 years." (*Ibid.*) "'Quantifiable' means the ability to accurately measure and calculate GHG reductions relative to a project baseline in a reliable and replicable manner for all GHG emission sources." (*Ibid.*) "'Verifiable' means that an Offset Project Data Report assertion is well documented and transparent such that it lends itself to an objective review by an accredited verification body and the emissions reductions are "enforceable" such that the agency has the authority to hold a particular party liable and to take appropriate action for violations. *Golden Door,* 50 Cal. App. 5th at 506-507. "Enforceable" generally means that a public agency has the authority to hold a particular party liable and to take appropriate action for violations. (Cal. Code Regs., tit. 17, § 95802.)

available. However, as previously discussed, *Golden Door* found that this type of mitigation measure would be invalid because OIAA cannot lawfully rely on the protocols established by a registry, but rather must adopt its own protocols that are at least substantially similar to the CARB Cap-and-Trade Program protocols following compliance with due process principles, including public notice and an opportunity to comment. The court found that, without such action, it could have no assurance that any GHG offset mitigation measure was real, permanent, quantifiable, verifiable and enforceable, which thereby precludes a finding that the mitigation measure was effective under CEQA.

To date, OIAA has not adopted any such offset protocols that include review, verification, monitoring, and enforcement processes and has no current plans to do so. Moreover, it is unaware of any law or regulation that mandates its adoption of such offset protocols.

Furthermore, it would be extremely challenging and disruptive for a single-purpose authority like OIAA to develop GHG offset protocols. OIAA is a joint powers authority established to oversee the operation, maintenance, management, administration, development, and marketing of ONT, a commercial service airport. As such, OIAA lacks the expertise and resources to develop, administer, or monitor the deployment of a carbon offset program that is informed by GHG reduction quantification methodologies, including the protocols for particular offsetting activities.

Development of offset protocols requires subject matter expertise regarding specific GHG reduction and GHG avoidance activities, including the ability to delineate quantitative parameters for the modeling and estimation of calculated reduction or avoidance benefits. Examples of the topical content of offset protocols can be seen at the Climate Action Reserve's website (https://www.climateactionreserve.org/) and include but are not limited to: protocols for natural climate solutions (*e.g.*, biochar, forest management, soil enrichment, rice cultivation); waste handling and methane destruction (*e.g.*, livestock and landfill management); and industrial processes and gases (*e.g.*, nitric acid production, ozone depleting substantives, adipic acid production, coal mine methane capture). As can be seen, these topical content areas are hardly a natural or good fit for, and are beyond the expertise of, an airport operator/proprietor.

OIAA is also unaware of any local government or authority in California that has chosen to adopt offset protocols following the *Golden Door* decision in a non-Cap-and-Trade Program context in order to establish an effective GHG offset mitigation measure. Relatedly, no relevant jurisdictional authorities with potential expertise in the subject area (*e.g.*, CARB, SCAQMD, SCAG) have developed statewide or regional carbon offset programs and protocols for application or use in any context other than the Cap-and-Trade Program.

The comment identifies "several offsets available" for potential use. Each is described further in **Table H-1: Offset-Generating Projects**, below, based on information made available through the American Carbon Registry's (ACR) "Projects Report" database available at Public Registry — American Carbon Registry. As shown, each of the offset-generating projects referenced by the comment is being administered by a carbon offset project developer pursuant to quantification protocols established by ACR acting in its capacity as a private, voluntary GHG registry. These protocols have not been developed and adopted by any public agency pursuant to a public process, and were not specifically designed for application in any context other than the Cap-and-Trade Program. Moreover, these are the very types of offsets that the *Golden Door* court found did not pass CEQA muster, as they were developed pursuant to a private registry's standards. As such, any offsets available for purchase from these ACR projects are not appropriate for use here.

TABLE H-1
OFFSET-GENERATING PROJECTS

Project ID	Evaluation
ACR581	This wetland restoration project is being implemented under a voluntary offset protocol that is "not ARB eligible," meaning the credits generated under the protocol are not eligible for use in California's Cap-and-Trade Program market.
ACR168	This forest carbon project is being implemented under a voluntary offset protocol that is "not ARB eligible," meaning the credits generated under the protocol are not eligible for use in California's Cap-and-Trade Program market.
ACR672	This forest carbon project is being implemented under a voluntary offset protocol that is "not ARB eligible," meaning the credits generated under the protocol are not eligible for use in California's Cap-and-Trade Program market.
ACR732	This forest carbon project is being implemented under a voluntary offset protocol that is "not ARB eligible," meaning the credits generated under the protocol are not eligible for use in California's Cap-and-Trade Program market.
ACR734	This forest carbon project is being implemented under a voluntary offset protocol that is "not ARB eligible," meaning the credits generated under the protocol are not eligible for use in California's Cap-and-Trade Program market.

The comment further suggests that "[t]he Project can create its own local or on-site measures to sequester GHG emissions or offset the Project emissions, such as a conservation easement or restoration to preserve and rehabilitate the surrounding project site and therefore sequester carbon emissions."

This comment is not well-taken and the suggested mitigation measure is infeasible. First, as discussed in **Topical Response 1: Sustainable Project Design Features and Mitigation Measures**, the Draft EIR includes numerous project design features and recommended mitigation measures to minimize the Project's GHG and air quality emissions related to on-site operational activities, including carbon neutral building design, the electrification of onsite vehicles and equipment and a commitment to onsite solar energy production, as well as the use of electric delivery trucks and aircraft.

Second, ONT is already developed. There is no habitat to preserve on the airport property through a conservation easement, nor any habitat to restore.

Third, and practically speaking, it is not feasible for OIAA or the Project Applicant to identify, administer, and undertake off-site GHG reduction activities within the region to generate CEQA-compliant carbon offsets. Such an effort would require OIAA (or the Project Applicant) to initiate and complete the following efforts, among others:

- identify potential off-site locations that are likely under different ownership, and survey such locations for potential GHG reduction opportunities;
- evaluate the constraints of each off-site location and the preliminary magnitude of GHG reduction potential;
- negotiate the legal rights necessary to make GHG reduction improvements at such off-site locations;
- work with carbon offset project developers to create new types of reduction activities that likely are *not* the subject of existing, scientifically-vetted methodologies and quantification protocols;
- create and adopt methodologies and protocols for the specific type of reduction activity that meet the relevant environmental integrity standards;
- negotiate contractual terms required to implement such reduction activities;
- administer and fund such activities; and
- accomplish each of the steps outlined herein prior to issuance of project permits.

As discussed above, the quantification protocols would need to be subject to a public review process and adopted by OIAA. In addition, each GHG reduction activity itself would also likely require administrative review, CEQA review, public hearings, and approval by another public agency (*i.e.*, the agency with land use jurisdiction over the off-site location). As discussed further below, this is not a feasible mitigation option for numerous reasons.

CEQA "does not demand [the implementation of mitigation measures that are] not realistically possible, given the limitation of time, energy, and funds." *Concerned Citizens of South Central L.A. v. Los Angeles Unified School Dist.*, 24 Cal. App. 4th 826, 841 (1994) (*Concerned Citizens*); see also *Clover Valley*, 197 Cal. App. 4th at 243. In *Concerned Citizens*, for example, appellants argued an EIR for the construction of an elementary school should have considered mitigation measures for the project's impact on housing loss to include building replacement housing, putting money in a housing fund, or working with groups to rehabilitate housing. (*Id.* at p. 841.) The court found appellant's arguments "that the [agency] was obligated to consider the mitigation measures of funding replacement housing or building replacement housing itself are novel claims offered without any applicable legal authority to establish that such measures are economically or legally feasible." (*Id.* at p. 842.) Ultimately, the court concluded that it was "aware of no authority which would *require* the [agency], under the circumstances of this case, to consider a mitigation measure which itself may constitute a project at least as complex, ambitious, and costly as the [proposed] project itself." (*Id.*)

Here, requiring OIAA or the Project Applicant to identify, administer and undertake its own off-site GHG reduction activities is likely not capable of being accomplished in a successful manner within a reasonable period of time. Like the mitigation in *Concerned Citizens*, no evidence has been presented that it is feasible for OIAA or the Applicant to undertake its own off-site GHG reduction activities. To the contrary, there is substantial evidence of great uncertainty associated with the undertaking of an off-site GHG reduction activity, rendering the potential mitigation strategy *infeasible* under CEQA and the CEQA Guidelines.

Moreover, there is substantial uncertainty as to whether the off-site GHG reduction activities would be approved by the land use agency with jurisdiction over the off-site location. In *Save Panoche Valley v. San Benito County,* 217 Cal. App. 4th 503 (2013), the court held an alternative was infeasible in part because there was uncertainty regarding whether it would be approved by another jurisdiction. (*Id.* at p. 522.) The court explained that an alternative is not infeasible simply because it lies outside the boundaries of an agency's jurisdiction; "[h]owever, whether or not an alternative site is located within the boundaries of a county is certainly a factor that may be considered when determining a project's feasibility." *Id.* at p. 522; see also *Citizens of Goleta Valley v. Board of Supervisors,* 52 Cal. 3d 553, 575 (1990) (holding that a lead agency "could properly find that a property located outside of its decision making authority was not a feasible project alternative"). The court upheld the agency's determination that the project alternative was infeasible because "there was no way to determine with confidence whether [the outside jurisdiction] would even consider approving such a project." *Id.* at p. 522.

In addition, it is unlikely that off-site GHG reduction activities could be accomplished within a reasonable period of time. In order to ensure that GHG emissions are not mitigated "too late,"

the necessary off-site GHG reduction activities would need to be identified, administered and undertaken prior to the issuance of permits affiliated with the emissions-generating activities. However, the efforts required to reach the implementation phase of an off-site GHG reduction activity makes clear the process would be a multi-year endeavor, given the numerous actions needed to identify, administer and undertake an off-site GHG reduction activity. As discussed above, such actions include, among other things, preliminary investigative work to identify reduction opportunities, the necessary negotiation of property access and other contractual terms, the retention of experts and contractors to undertake the activity, and development and approval of a quantification protocol or methodology. Under any standard of "reasonableness," the multi-year process to implement an off-site GHG reduction activity would be unreasonable and unworkable here.

In conclusion, mitigation that requires OIAA or the Project Applicant to identify, administer and undertake a GHG reduction activity outside of the Project site and in the region, in the absence of an existing agency-administered plan or program, including quantification protocols, for such activities, is infeasible under CEQA and the CEQA Guidelines. Furthermore, such mitigation is unreasonable and not roughly proportional to the extent and impacts of the proposed Project, making the mitigation inconsistent with statutory and constitutional requirements.

Comment H-13:

The EIR has concluded that the Project's GHG emissions will significant after mitigation, and so CEQA requires the lead agency to mitigate all of the Project's GHG impacts, but the DEIR fails to require this, in spite of the fact that there are feasible mitigation measures, alternatives, and offsets that should be considered, such as offsets or solar panels on site. The lead agency has not met its burden of showing that such measures are infeasible, and therefore the DEIR should be amended to reflect all feasible mitigation, as well as a reasonable range of project alternatives, to mitigate all the Project's "fair share" of GHG emissions. Please put me on the interest list to receive updates about the progress of this project.

Response H-13:

The comprehensive suite of PDFs and mitigation measures recommended in the Final EIR would reduce the proposed Project's GHG emissions to the extent feasible. Relatedly, the GHG emissions reduction framework addressed in the Final EIR appropriately covers those emission sources over which OIAA maintains jurisdictional authority and regulatory control. The Final EIR also evaluates a reasonable range of alternatives to the proposed Project in Section 6.0: Alternatives to the Proposed Project in the Draft EIR, identifying Alternative 2 (the Reduced Project Size Alternative) as the environmentally superior alternative while also disclosing its

inability to fully meet the proposed Project objectives. In this respect, the EIR is consistent with the requirements of CEQA.

More specifically, regarding the alleged failure of the Draft EIR to recommend all feasible mitigation measures, see **Topical Response 1: GHG and Air Quality Mitigation Measures** and **Responses to Comments H-3** through **H-9**, above. Regarding the use of on-site solar panels, see **Response to Comment H-9**, above. With respect to the potential use of offsets, see **Response to Comment H-12**, above. As to mitigating the Project's "fair share" of GHG emissions, see **Response to Comment H-3**, above.

Advocates for the Environment has been added to the list of organizations to receive notifications related to the proposed Project. No further response is necessary.

Leanna Williams

Subject: FW: He IOR for the propose S. Airport, cargo center project at Ontario airport

From: Keith, Kevin <kkeith@flyontario.com>
Sent: Monday, March 20, 2023 3:31 PM
To: DEBBIE DUNCAN <fern3408@aol.com>
Cc: Avant Ramsey <aramsey@ricondo.com>; Arya Moalemi <amoalemi@ricondo.com>
Subject: RE: He IOR for the propose S. Airport, cargo center project at Ontario airport

Good afternoon Debbie,

You are in the right section of the website, the Draft EIR is listed under Notices. Here is the direct link for you:
https://www.flyontario.com/sites/default/files/2023-03/ONT_SACC_DEIR_NOA_English_030923.pdf

Let us know if you need anything else.
Thanks,

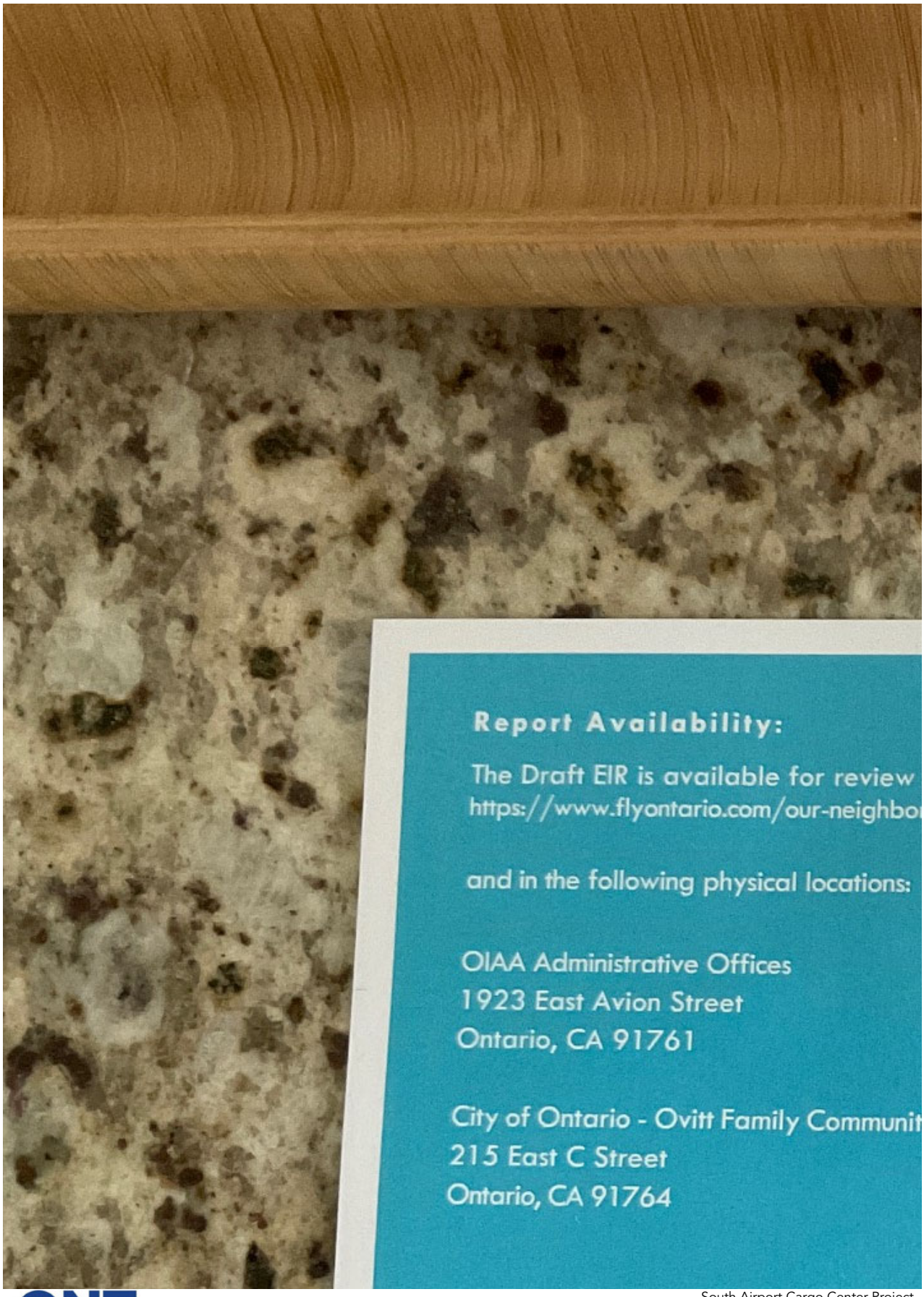
Kevin Keith
Director of Planning
Ontario International Airport
M: 720.201.6165 | **O:** 909.544.4225
kkeith@flyontario.com | @flyONT

From: DEBBIE DUNCAN <fern3408@aol.com>
Sent: Thursday, March 16, 2023 10:34 AM
To: Keith, Kevin <kkeith@flyontario.com>
Subject: He IOR for the propose S. Airport, cargo center project at Ontario airport

I went on the website fly Ontario\our neighbors\environment I cannot locate the environmental draft that I'm supposed to be looking at because I live near the Ontario airport.
The majority of the items on the page were old items. Perhaps I'm not looking in the right spot and I have as you can see the mailer that came that directed me where to go but I need some help. Where can I read the draft? I am 6.2 miles away, and while it probably does not affect me being this far away, I cannot tell because I can't find the EIR.

I-1

Kindest Regards


Report Availability:
The Draft EIR is available for review
https://www.flyontario.com/our-neighbo
and in the following physical locations:
OIAA Administrative Offices
1923 East Avion Street
Ontario, CA 91761
City of Ontario - Ovitt Family Communit
215 East C Street
Ontario, CA 91764

Debbie Duncan
4554 S Afton Privado
Ontario

COMMENT LETTER I

Debbie Duncan
March 16, 2023

Comment I-1:

I went on the website fly Ontario\our neighbors\environment I cannot locate the environmental draft that I'm supposed to be looking at because I live near the Ontario airport. The majority of the items on the page were old items. Perhaps I'm not looking in the right spot and I have as you can see the mailer that came that directed me where to go but I need some help. Where can I read the draft? I am 6.2 miles away, and while it probably does not affect me being this far away, I cannot tell because I can't find the EIR.

Response I-1:

A direct link to the NOA and Draft EIR was provided to Ms. Duncan on March 20, 2023. No further response is necessary.

4.0 MITIGATION MONITORING AND REPORTING PROGRAM

4.1 INTRODUCTION

Public Resources Code Section 21081.6 and Section 15097 of the California Environmental Quality Act (CEQA) Guidelines require public agencies to establish monitoring or reporting programs for projects approved by a public agency whenever approval involves the adoption of either a mitigated negative declaration or specified environmental findings related to environmental impact reports.

This is the Mitigation Monitoring and Reporting Program (MMRP) for the South Airport Cargo Center Project (proposed Project). The intent of the MMRP is to ensure the successful implementation of the mitigation measures identified in the Final Environmental Impact Report (Final EIR) for the proposed Project.

4.2 MITIGATION MEASURES

The mitigation measures in the Final EIR are assigned the same title as in the Draft EIR. Additional new mitigations measures from **Section 2.0: Additions and Corrections** are assigned the same title as in the Final EIR. The MMRP shown in **Table 4-1: Mitigation Monitoring and Reporting Program** describes the actions to be taken to implement each mitigation measure, the timing of these actions, the entities responsible for implementing and monitoring the actions, and, where appropriate, the entities responsible for ensuring that reporting responsibilities are carried out.

In some instances, mitigation measures require a monitor or community liaison to be retained or designated. In those instances, the person or entity designated to perform this task shall be identified to OIAA, and OIAA will review that person or entity's qualifications to confirm that the designated party has the requisite expertise or qualifications.

The MMRP also includes a table identifying "Project Design Features" (PDFs) (**Table 4-2: Project Design Features**). This information is included for convenience and comprehensiveness. These PDFs are not "mitigation measures" as defined by CEQA. PDFs consist of elements or features that have been incorporated into the proposed Project that may reduce the environmental effects of the proposed Project. These PDFs are included in a separate table in order to ensure that these features are implemented.

4.3 MMRP COMPONENTS

The components of the attached tables, which contain applicable mitigation measures and project design features, are addressed briefly, below:

- Impact: This column summarizes the impact stated in the Draft EIR, as revised in the Final EIR.
- Mitigation Measure: All mitigation measures identified in the Draft EIR, as revised in the Final EIR, are presented and titled accordingly.
- Implementing Party: The column entitled "Implementing Party" identifies the entity that will undertake the required action. The Implementing Party is most often the Contractor/Applicant, who will be responsible for the design, construction, or operation of each site, phase, or component of the proposed Project. The Contractor/Applicant responsible for undertaking a required action may include the owner or operator of the proposed Project component, as appropriate. In some instances, the required action will or should be undertaken by another party. This column therefore provides clarity regarding the entity that is primarily responsible for carrying out the action.
- Monitoring Party: This column identifies the specific party responsible for monitoring. OIAA is primarily responsible for monitoring that mitigation measures are successfully implemented. Though the proposed Project is within the Airport, the Airport is located in the City of Ontario. Therefore, the City of Ontario would have responsibility for monitoring some aspect of the overall proposed Project.
- Timeframe/Monitoring Milestone: Implementation of the action must occur prior to or during some part of Project approval, Project design or construction, or during ongoing Project operations. The timing and the monitoring milestone for each measure is identified in this column.
- Reporting Requirements (if applicable): Certain measures identify reporting responsibility. In those instances, the MMRP identifies the report or plan that must be prepared so that the monitoring party can confirm that the required action(s) have been implemented. This column also provides additional information that provide clarity concerning how the measure will be carried out.

TABLE 4-1
MITIGATION MONITORING AND REPORTING PROGRAM

Impact		Mitigation Measures	Implementing Party	Monitoring Party	Timeframe/ Monitoring Milestone	Reporting Requirements (if applicable)
AIR QUALITY						
Threshold AQ-2: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard?	**MM AQ-1:**	The Applicant shall require that construction vendors, contractors, and/or haul truck operators commit to using 2010 model year trucks (e.g., material delivery trucks and soil import/export with a gross vehicle weight rating of at least 14,001 pounds), that meet CARB's 2010 engine emissions standards or newer, cleaner trucks. The OIAA shall confirm that the Applicant includes this requirement in applicable bid documents, purchase orders, and contracts. Operators shall maintain records of all trucks associated with Project construction to document that each truck used meets these emission standards and make the records available for inspection.	OIAA & Applicant	OIAA	Prior to and during construction.	• Maintain records of applicable bid documents, purchase orders, and contracts. • Records maintained for all trucks and make them available for inspection.
	MM AQ-2:	The Applicant shall require that construction equipment such as concrete/industrial saws, pumps, aerial lifts, light stands, air compressors, and forklifts be electric or alternative-fueled (i.e., non-diesel), where feasible. Pole power shall be utilized at the earliest feasible point in time and shall be used to the maximum extent feasible in lieu of generators.	Applicant	OIAA	Prior to and during construction.	• Maintain records of applicable bid documents, purchase orders, and contracts.
	MM AQ-3:	The Applicant shall support and encourage ridesharing and transit incentives for the construction crew by providing crews with the resources needed to organize rideshares, such as bulletin boards or email announcements. The Applicant shall also partially subsidize transit fares or passes for the construction crew members who can feasibly use transit. The Applicant shall set a goal to achieve ten percent total construction worker participation in ridesharing programs and transit use.	Applicant	OIAA	During construction.	• Maintain records documenting the ridesharing and transit incentive program offered to the construction crew.

TABLE 4-1
MITIGATION MONITORING AND REPORTING PROGRAM

Impact		Mitigation Measures	Implementing Party	Monitoring Party	Timeframe/ Monitoring Milestone	Reporting Requirements (if applicable)
	MM AQ-4:	The Applicant shall require, in addition to the GSE noted within PDF AQ-3, all other on-site cargo-handling equipment, such as yard trucks, holsters, yard goats, pallet jacks, and similar equipment, to be electric, with the necessary electrical charging stations provided.	Applicant	OIAA	During operation.	• Maintain logs documenting engine types for all on-site, cargo-handling equipment.
	MM AQ-5:	The Applicant shall require, if and to the extent feasible, the use of zero-emission or near zero-emission on-road heavy duty trucks as part of business operations beginning in 2025 (within at least 25 percent of the Project fleet). The Applicant also shall require, if and to the extent feasible, the use of zero-emission or near zero emission on-road heavy duty trucks as part of the business operations beginning in 2029 (within at least 50 percent of the Project fleet).	Applicant	OIAA	During operation	• Maintain annual logs documenting delivery truck fleet composition, including engine types, beginning in 2025 and for all Project operational years subsequent thereto.
	MM AQ-6:	The Applicant shall include in the design requirements for the Project, cool roof installation to the extent roof space is not occupied by solar panels, in order to reduce energy use and urban heat island effects.	Applicant	OIAA	Pre-construction and prior to certificate of occupancy.	• Review and approval of plans.
	MM AQ-7:	The Applicant shall encourage the use of single engine taxi operations for Project aircraft.	Applicant	OIAA	During operation.	• Maintain records documenting encouraged taxi operation protocols for Project aircraft.
	MM AQ-8:	The Applicant shall utilize Energy Star heating, cooling, and lighting devices, and appliances (e.g., Heating, Ventilation, and Air Conditioning (HVAC) units in the form of energy efficient commercial heat pumps) within the interior of the Air Cargo Sort Building.	Applicant	OIAA	Pre-construction and prior to certificate of occupancy.	• Review and approval of plans.
	MM AQ-9:	In order to reduce trips to and from the Project site during construction, the Applicant shall provide on-site food trucks during meal times.	Applicant	OIAA	During construction.	• Maintain records documenting presence of on-site food vendors.

TABLE 4-1
MITIGATION MONITORING AND REPORTING PROGRAM

Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timeframe/ Monitoring Milestone	Reporting Requirements (if applicable)
	MM AQ-10: Interior- and exterior-facing signs, including signs directed toward all dock and delivery areas, shall be posted by the Applicant to identify contact information to report idling violations to CARB, SCAQMD, and the building manager. These signs also shall inform truck drivers to shut off their engines when not in use.	Applicant	OIAA	During operation.	• Maintain logs documenting signage content, posting locations, and posting dates.
	MM AQ-11: Electric plugs for electric transport refrigeration units shall be provided at dock doors located at the Air Cargo Sort Building.	Applicant	OIAA	Prior to certificate of occupancy.	• Maintain logs documenting installation and location of plugs for electric transport refrigeration units.
	MM AQ-12: The Applicant shall train operational managers and employees on efficient scheduling and load management to eliminate unnecessary queuing of trucks.	Applicant	OIAA	During operation.	• Maintain logs documenting frequency of trainings and attendee names.
	MM AQ-13: Signs shall be posted by the Applicant at every truck exit driveway providing directional information to use truck routes as designated by the City of Ontario.	Applicant & OIAA	OIAA	During operation.	• Maintain logs documenting signage content, posting locations, and posting dates.
	MM AQ-14: The Applicant shall require its facility operator(s) to train the staff in charge of keeping vehicle records on diesel technologies and compliance with CARB regulations by attending CARB-approved courses. Also, the Applicant shall require its facility operator(s) to maintain records on-site demonstrating regulatory compliance and make records available for inspection by OIAA, SCAQMD, and State of California upon request.	Applicant	OIAA	During operation.	• Maintain logs documenting frequency of trainings and attendee names. • Records on-site demonstrating compliance and to be made available for inspection.
	MM AQ-15: The Applicant shall include a provision in all operational freight hauling contracts requiring the use of 2010 model year trucks that meet CARB's 2010 engine emission standards, or newer and cleaner trucks, if and to the extent feasible.	Applicant	OIAA	During operation.	• Maintain logs documenting applicable contractual term(s) and model years comprising the trucking fleet.

TABLE 4-1
MITIGATION MONITORING AND REPORTING PROGRAM

Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timeframe/ Monitoring Milestone	Reporting Requirements (if applicable)
	MM AQ-16: During construction, the Applicant shall post interior- and exterior-facing signs to inform construction contractors to shut off truck and equipment engines when not in use.	Applicant	OIAA	During construction.	• Maintain logs documenting signage content, posting locations, and posting dates.
	MM TRANS-1, MM TRANS-2, MM TRANS-3, MM TRANS-4, and **MM TRANS-5.**	See under Threshold TRA-2.	See under Threshold TRA-2.	See under Threshold TRA-2.	• See under Threshold TRA-2.
BIOLOGICAL RESOURCES					
Threshold BIO-1: Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	**MM BIO-1:** **Burrowing Owl**. All disturbed areas of the Project site that were determined to have a low potential to provide suitable habitat for burrowing owls, which primarily includes the existing track infield grassy areas of the Project site, require focused preconstruction surveys to be conducted; the first take avoidance survey shall be conducted within 14 days prior to ground disturbance and the second take avoidance survey shall be conducted 24 hours prior to ground disturbance to determine presence of burrowing owls. These surveys shall conform to the survey protocol established by the CDFW Staff Report on Burrowing Owl Mitigation (CDFW 2012) and will be conducted by a qualified biologist across all suitable breeding, wintering, and foraging habitat within the Project and appropriate buffer. Copies of the survey results shall be submitted to CDFW and OIAA. • If no burrowing owls are detected, no further mitigation is necessary. • If burrowing owls are detected during focused surveys and/or take avoidance surveys, CDFW will be immediately informed of its location and status. The project will avoid all impacts to burrowing owls onsite. If	Applicant & Qualified biologist	Qualified Biologist, OIAA, USFWS, and CDFW if BUOW found	Prior to construction activities: • 14 days prior to ground disturbance • 24 hours prior to ground disturbance	• Survey results submitted to CDFW and OIAA • BUOW Protection and Relocation Plan (if applicable)

TABLE 4-1
MITIGATION MONITORING AND REPORTING PROGRAM

Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timeframe/ Monitoring Milestone	Reporting Requirements (if applicable)
	this is not feasible, a Burrowing Owl Protection Plan will be prepared by a qualified biologist, which must be approved by CDFW prior to initiating the project. The Burrowing Owl Protection Plan will include conserving all nesting, occupied, and satellite burrows and/or burrowing owl habitat such that the habitat acreage, number of burrows, and burrowing owls impacted are maintained and/or replaced. Further coordination with CDFW will occur to identify mitigation for the loss of habitat through the acquisition, conservation, and management of in-kind habitat. Lands conserved will include 1) sufficiently large acreage with fossorial mammals present; 2) permanent protection through a conservation easement for the purpose of conserving burrowing owl habitat and prohibiting activities incompatible with burrowing owl use; 3) development and implementation of a mitigation land management plan to address long-term ecological sustainability and maintenance of the site for burrowing owls; and 4) funding for the maintenance and management of mitigation land through the establishment of a long-term funding mechanism such as an endowment (CDFW, 2012).				
	MM BIO-2: **Nesting Birds.** **Bird** nesting season generally extends from February 1 through September 15 in southern California and, specifically, April 15 through August 31 for migratory passerine birds and January 15 to August 31 for raptors. In order to ensure compliance with the Migratory Bird Treaty Act and to avoid impacts to nesting birds (common and special status) during the nesting season, a qualified Avian Biologist must be	Applicant & Qualified biologist	Qualified Biologist, OIAA, and USFWS if active nests found	During nesting season: • Pre-construction survey no more than three days prior to the commencement of	• Pre-construction survey report, and reports for any necessary subsequent surveys

TABLE 4-1
MITIGATION MONITORING AND REPORTING PROGRAM

Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timeframe/ Monitoring Milestone	Reporting Requirements (if applicable)
	retained to conduct pre - construction Nesting Bird Surveys (NBS) will occur prior to Project - related disturbance to nestable vegetation to identify any active nests. The NBS shall be performed no more than three days prior to the commencement of construction activities. The survey(s) will occur at the appropriate time of day/night, during appropriate weather conditions. Surveys will encompass all suitable areas, including trees, shrubs, bare ground, burrows, cavities, and structures. Survey duration will take into consideration the acreage of the Project impacts; density, and complexity of the habitat; number of survey participants; survey techniques employed; and will be sufficient to ensure the data collected is complete and accurate. Pre-construction surveys will focus on both direct and indirect evidence of nesting, including nest locations and nesting behavior (i.e., copulation, carrying of food or nest materials, nest building, removal of fecal sacks, flushing suddenly from atypically close range, agitation, aggressive interactions, feigning injury or distraction displays, or other behaviors). The results of the NBS shall be documented by the qualified biologist. If construction is inactive for more than seven days, an additional survey shall be conducted. If no active nests are found, no further action will be required. If a nest is suspected, but not confirmed, the qualified biologist will establish a disturbance-free buffer until additional surveys can be completed, or until the location can be inferred based on observations. The qualified biologist will not risk failure of the nest to determine the exact location or status and will make every effort to limit the nest to potential predation as a result of the survey/monitoring efforts (i.e., limit number of surveyors, limit time spent at/near the nest, scan the site for potential nest predators before approaching, or immediately			construction activities • Additional surveys required if construction is inactive for more than seven days during breeding season	

TABLE 4-1
MITIGATION MONITORING AND REPORTING PROGRAM

Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timeframe/ Monitoring Milestone	Reporting Requirements (if applicable)
	depart nest area if indicators of stress or agitation are displayed). If a nest is observed, but thought to be inactive, the qualified biologist will monitor the nest for 1 hour (4 hours for raptors during the nonbreeding season) prior to approaching the nest to determine status. The qualified biologist will use their best professional judgement regarding the monitoring period and whether approaching the nest is appropriate. If an active nest is found, the biologist will set appropriate no - work buffers (typically 300 feet for passerine and non-special-status species, and 500 feet for hawks and special-status species) around the nest, which will be based upon the nesting species, its sensitivity to disturbance, nesting stage and expected types, intensity, and duration of disturbance – typically 300 feet of a migratory bird and 500 feet for raptors. Once the buffer is established, the qualified biologist will document baseline behavior, stage of reproduction, and existing site conditions, including vertical and horizontal distances from proposed work areas, visual or acoustic barriers, and existing level of disturbance. Following documentation of baseline conditions, the qualified biologist may choose to make adjustments to the buffer based on site characteristics, stage of reproduction, and types of Project activities proposed at/near that location. The qualified biologist will monitor the nest at the onset of Project activities, and at the onset of any changes in Project activities (i.e., increase in number or type of equipment, change in equipment usage, etc.) to determine the efficacy of the buffer. If the qualified biologist determines that Project activities may be causing an adverse reaction, the qualified biologist will adjust the buffer accordingly. The qualified biologist will be onsite daily to monitor all existing nests, the efficacy of established buffers, and to document any new nesting				

TABLE 4-1
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Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timeframe/ Monitoring Milestone	Reporting Requirements (if applicable)
	occurrences. The qualified biologist will document the status of all existing nests, including the stage of reproduction and the expected fledge date. If a nest is suspected to have been abandoned or failed, the qualified biologist will monitor the nest for a minimum of 1 hour (4 hours for raptors), uninterrupted, during favorable field conditions. If no activity is observed during that time, the qualified biologist may approach the nest to assess the status. The permittee, under the direction of the qualified biologist, may also take steps to discourage nesting on the Project site, including moving equipment and materials daily, covering material with tarps or fabric, and securing all open pipes and construction materials. The qualified biologist will ensure that none of the materials used pose an entanglement risk to birds or other species. The buffer shall remain until the young have fledged the nest and the nest is confirmed to no longer be active, or as determined by the qualified biologist. The nests and buffer zones shall be field checked weekly by a qualified biological monitor. The approved no - work buffer zone shall be clearly marked in the field, within which no disturbance activity shall commence until the qualified biologist has determined the young birds have successfully fledged and the nest is inactive.				
MM BIO-3:	**Roosting Bats**. A pre-construction bat roosting survey shall be conducted by a qualified bat biologist on structures and trees being removed or impacted by construction on site that may provide suitable roosting opportunities for local common bat species within 14 days prior to construction. If bats are determined to be present, CDFW shall be consulted on creating a bat mitigation plan.	Applicant & Qualified bat biologist	Qualified Bat Biologist, OIAA, USFWS, and CDFW if bats found	Prior to construction activities: • 14 days prior to ground disturbance	• Survey results submitted to CDFW and OIAA • Bat Mitigation Plan (if applicable)

TABLE 4-1
MITIGATION MONITORING AND REPORTING PROGRAM

Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timeframe/ Monitoring Milestone	Reporting Requirements (if applicable)
CULTURAL RESOURCES					
Threshold CUL-2: Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	**MM CUL-1: Archaeological Monitoring of All Ground-Disturbing Activities During Construction of Phase 1 and Phase 2.** 1. Prior to the issuance of grading permits by the City of Ontario for Phase 1 and Phase 2 of the proposed Project, the OIAA and/or its construction contractor must retain a qualified professional archeologist meeting the Secretary of Interior's PQS for Archaeology (as defined in the Code of Federal Regulations, 36 CFR Part 61). The qualified archaeologist will be retained to conduct monitoring of rough grading activities conducted during both Project phases. The qualified archaeologist shall have the authority to redirect earthmoving activities in the event that suspected cultural resources are unearthed during construction activities. 2. The qualified archaeologist shall prepare a Cultural Resources Monitoring and Treatment Plan that will describe processes for archaeological monitoring and for handling incidental discovery of objects, features, and cultural resources for all ground-disturbing construction and preconstruction activities. 3. Prior to the issuance of a grading permit, all construction workers involved with grading and trenching operations shall receive training by the qualified archaeologist to recognize unique archaeological resources, including tribal cultural resources, should such resources be unearthed during ground-disturbing construction activities. The training of all construction workers involved with grading and trenching operations shall explain the importance and legal basis for the protection of significant archaeological resources. It will include a brief review of the cultural	OIAA	OIAA and qualified professional archaeologist	Prior to issuance of grading permits for Phase 1 and Phase 2.	• A Cultural Resources Monitoring and Treatment Plan prepared by a qualified archaeologist.

TABLE 4-1
MITIGATION MONITORING AND REPORTING PROGRAM

Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timeframe/ Monitoring Milestone	Reporting Requirements (if applicable)
	sensitivity of the construction area and the surrounding area; what resources could potentially be identified during earthmoving activities; the requirements of the monitoring program; the protocols that apply in the event inadvertent discoveries of cultural resources are identified, including who to contact and appropriate avoidance measures until the find(s) can be properly evaluated; and any other appropriate protocols. All new construction personnel involved with grading and trenching operations that begin work following the initial training session must take the training prior to beginning work; the qualified archaeologist shall be available to provide the training on an as needed basis. 4. In the event subsurface artifacts or features are encountered during ground-disturbing activities, the construction supervisor shall be required by his contract to immediately halt and redirect grading operations within a 100-foot radius of the discovery and see identification and evaluation of the suspected resource by the qualified archaeologist for listing in the NRHP and CRHR. This requirement shall be noted on all grading plans and the construction contractor shall be obligated to comply with the note. 5. After the qualified archaeologist makes his/her initial assessment of the nature of the find. The archaeologist shall pursue either protection in place or recovery, salvage, and treatment of the deposits. Recovery, salvage, and treatment protocols shall be developed in accordance with applicable provisions of Public Resource Code Section 21083.2 and State CEQA Guidelines 15064.5 and 15126.4 in consultation with OIAA or with a recognized scientific or				

TABLE 4-1
MITIGATION MONITORING AND REPORTING PROGRAM

Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timeframe/ Monitoring Milestone	Reporting Requirements (if applicable)
	educational repository, including the SCCIC. Preservation in place shall be the preferred means to avoid impacts to archaeological resources qualifying as historical resources, consistent with CEQA Guidelines Section 15126.4(b)(3)(C).				
GEOLOGY AND SOILS					
Threshold GEO-1:					
i. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:					
ii. Strong seismic ground shaking?	**MM GEO-5: Geotechnical Investigation Recommendations**. The proposed Project shall implement and incorporate the recommendations in the Geotechnical Investigation, Section 5.0 Conclusion and Recommendations (see pages 7 through 24 of Appendix 5.6-1 of this EIR). Prior to contract bidding, site grading and foundation plans shall be reviewed and approved by Cotton, Shires and Associates, Inc. or a certified Geologist, for consistency with the Geotechnical Investigation recommendations.	Applicant & OIAA	OIAA and certified geologist.	Prior to contract bidding and ground disturbance.	• Site grading and foundation plans shall be reviewed and approved by Cotton, Shires and Associates, Inc. or a certified Geologist, for consistency with the Geotechnical Investigation recommendations.
iii. Seismic-related ground failure, including liquefaction and lateral spreading?	Implementation of **MM GEO-5**.	See above under Threshold GEO-1 (ii).	See above under Threshold GEO-1 (ii).	See above under Threshold GEO-1 (ii).	See above under Threshold GEO-1 (ii).
Threshold GEO-2: Result in substantial soil erosion or the loss of topsoil?	Implementation of **MM GEO-5**.	See above under Threshold GEO-1 (ii).	See above under Threshold GEO-1 (ii).	See above under Threshold GEO-1 (ii).	See above under Threshold GEO-1 (ii).

TABLE 4-1
MITIGATION MONITORING AND REPORTING PROGRAM

Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timeframe/ Monitoring Milestone	Reporting Requirements (if applicable)
Threshold GEO-3: Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	Implementation of **MM GEO-5**.	See above under Threshold GEO-1 (ii).	See above under Threshold GEO-1 (ii).	See above under Threshold GEO-1 (ii).	See above under Threshold GEO-1 (ii).
Threshold GEO-4: Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	Implementation of **MM GEO-5**.	See above under Threshold GEO-1 (ii).	See above under Threshold GEO-1 (ii).	See above under Threshold GEO-1 (ii).	See above under Threshold GEO-1 (ii).
Threshold GEO-6: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	**MM GEO-1: Paleontological Resources Mitigation and Monitoring Plan (PRMMP).** A professional paleontologist shall be retained to monitor earth-disturbing construction activities. Prior to the commencement of ground-disturbing activities, the qualified paleontologist, meeting the Society of Vertebrate Paleontology (SVP) Standards, must prepare a Paleontological Resources Mitigation and Monitoring Plan (PRMMP) for the proposed Project. The PRMMP shall describe the monitoring required during excavations that extend into Pleistocene sediment, at approximately 9 feet bgs, and the location of areas deemed to have a high paleontological resource potential. The results of the geotechnical investigation conducted for the proposed Project shall be consulted to determine the approximate depth of Pleistocene sediment in the Project site. Paleontological monitoring shall entail the visual inspection of excavated and graded areas and trench sidewalls. If the qualified Paleontologist determines full-time	OIAA	OIAA and qualified paleontologist.	Prior to and during earth-disturbing activities.	• Paleontological Resources Mitigation and Monitoring Plan (PRMMP)

TABLE 4-1
MITIGATION MONITORING AND REPORTING PROGRAM

Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timeframe/ Monitoring Milestone	Reporting Requirements (if applicable)
	monitoring is no longer warranted, based on the geologic conditions at depth, he or she may recommend that monitoring be reduced or cease entirely.				
	MM GEO-2: Workers Environmental Awareness Program (WEAP). Prior to the start of the proposed Project ground-disturbing activities, all field personnel shall receive a worker's environmental awareness training on paleontological resources. The training must provide a description of the laws and ordinances protecting fossil resources, the types of fossil resources that may be encountered in the proposed Project area, the role of the paleontological monitor, outline steps to follow in the event that a fossil discovery is made and provide contact information for the qualified Paleontologist. The training must be developed by the qualified Paleontologist and can be delivered concurrent with other training.	Applicant	OIAA	Prior to the start of ground disturbance.	N/A
	MM GEO-3: Fossil Discoveries. In the event that a paleontological resource is discovered, the Paleontological monitor shall have the authority to temporarily divert the construction equipment around the find until it is assessed for scientific significance and, if appropriate, collected. If the resource is determined to be of scientific significance, the Paleontologist shall complete the following: 1. **Salvage of Fossils.** If fossils are discovered, all work in the immediate vicinity shall be halted to allow the paleontological monitor, and/or Project-qualified Paleontologist to evaluate the discovery and determine if the fossil may be considered significant. If the fossils are determined to be potentially significant, the Project-qualified Paleontologist shall recover them following standard field procedures for collecting paleontological as	OIAA	OIAA and qualified paleontologist.	During ground disturbance, if any paleontological resources are discovered.	• If fossils are discovered, fossil specimens must be delivered to the accredited museum or repository no later than 90 days after all fieldwork is completed

TABLE 4-1
MITIGATION MONITORING AND REPORTING PROGRAM

Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timeframe/ Monitoring Milestone	Reporting Requirements (if applicable)
	outlined in the PRMMP prepared for the project. Typically, fossils can be safely salvaged quickly by a single paleontologist and not disrupt construction activity. In some cases, larger fossils, such as complete skeletons or large mammal fossils, require more extensive excavation and longer salvage periods. In this case the Paleontologist shall have the authority to temporarily direct, divert or halt construction activity to ensure that the fossil(s) can be removed in a safe and timely manner. 2. **Fossil Preparation and Curation**. The PRMMP must identify a museum that has agreed to accept fossils that may be discovered during project-related excavations. Upon completion of fieldwork, all significant fossils collected must be prepared in a properly equipped laboratory to a point ready for curation. Preparation may include the removal of excess matrix from fossil materials and stabilizing or repairing specimens. During preparation and inventory, the fossils specimens must be identified to the lowest taxonomic level practical prior to curation at an accredited museum. The fossil specimens must be delivered to the accredited museum or repository no later than 90 days after all fieldwork is completed. The cost of curation shall be assessed by the repository and shall be the responsibility of the client.				
	MM GEO-4: Final Paleontological Mitigation Report. Upon completion of ground disturbing activity, and curation of fossils if necessary, the qualified Paleontologist shall prepare a final mitigation and monitoring report outlining the results of the mitigation and monitoring program. The report shall include discussion of the location, duration and methods of the monitoring, stratigraphic sections, any recovered fossils, and	OIAA	OIAA and qualified paleontologist.	After completion of ground disturbing activities.	• Final mitigation and monitoring report outlining the results of the mitigation and monitoring program

TABLE 4-1
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Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timeframe/ Monitoring Milestone	Reporting Requirements (if applicable)
	the scientific significance of those fossils, and where fossils were curated.				
GREENHOUSE GAS EMISSIONS					
Threshold GHG-1: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Implementation of **MM AQ-1, MM AQ-2, MM AQ-3, MM AQ-4, MM AQ-5, MM AQ-6, MM AQ-7, MM AQ-8, MM AQ-9, MM AQ-10, MM AQ-11, MM AQ-12, MM AQ-13, MM AQ-14, MM AQ-15, MM AQ-16, MM TRANS-1, MM TRANS-2, MM TRANS-3, MM TRANS-4,** and **MM TRANS-5.**	See under Threshold AQ-2 and Threshold TRA-2.	See under Threshold AQ-2 and Threshold TRA-2.	See under Threshold AQ-2 and Threshold TRA-2.	See under Threshold AQ-2 and Threshold TRA-2.
HAZARDS AND HAZARDOUS MATERIALS					
Threshold HAZ-2: Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	**MM HAZ-1: Soil Management Plan.** A Soil Management Plan (SMP) containing soil criteria and soil management and construction risk management protocols to be implemented during proposed Project development shall be prepared prior to disturbance of soils on the site by construction activities and implemented during construction to address any soil containing or suspected to contain PFAs on the proposed Project site and any previously undetected contamination encountered during construction. Special attention shall be made to soils disturbed in the Guardian Jet Center, southern hangar and structure previously housing fire prevention equipment due to the known presence of PFAs in these areas. Additional soil sampling shall be conducted as necessary to delineate the extent of PFAs contamination to enable segregation and proper disposal of any contaminated soil during construction.	OIAA	OIAA	Approvals prior to disturbance of soils and implemented during construction.	• Soil Management Plan (SMP)
	MM HAZ-2: Vapor Intrusion Mitigation System. A vapor intrusion mitigation system (VIM system) shall be installed under Phase II of the proposed Air Cargo Building to	OIAA	OIAA	Approvals prior to disturbance of soils	• Review and approval of plans.

TABLE 4-1
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Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timeframe/ Monitoring Milestone	Reporting Requirements (if applicable)
	address the potential for vapor intrusion from the subsurface. Alternatively, a soil vapor extraction remediation system could be utilized to reduce trichloroethene (TCE) and chloroform vapor concentrations through removal of volatile organic compounds (VOCs) in Phase II development area.			and implemented during construction.	
Threshold HAZ-5: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	Implementation of **MM NOI-1.**	See below under Threshold N-1.	See below under Threshold N-1.	See below under Threshold N-1.	See below under Threshold N-1.
NOISE					
Threshold N-3: Located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, if the project would expose people residing or working in the project area to excessive noise levels.	**MM NOI-1:** **Residential Sound Insulation Program (RSIP).** Non-compatible residential land uses within the 65+ decibel (dB) contour with habitable areas inside the home with average noise levels of 45 dB or greater with all windows closed would be eligible for the RSIP. The goal of the Program is to reduce the interior noise level within affected homes by at least five (5) decibels (dB). The results may vary depending upon the existing structural characteristics of the home. In order to achieve this goal, modifications may include the retrofit of exterior doors and windows, installation of a ventilation system, and other miscellaneous treatments. The RISP would include the following: A noise audit will be conducted for each home in the RISP to measure the noise reduction properties of a residence in its	OIAA	OIAA	Prior to Project construction.	• A noise audit conducted for each home in the RISP • Signature of an avigation easement by Property Owners who qualify for the RISP • Upon completion of the RSIP, disclosure by current owners that the residence was included in the RISP and is subject to an avigation easement.

TABLE 4-1
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Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timeframe/ Monitoring Milestone	Reporting Requirements (if applicable)
	existing condition to confirm that average interior aircraft sound levels are greater than a Community Noise Equivalent Level (CNEL) of 45 decibels (dB), and to provide an indication of the potential effectiveness of noise reducing treatments. The goal of the RISP is to reduce the average interior CNEL of habitable rooms by a minimum of 5 dB (i.e., a clearly detectable reduction), and reduce the average interior CNEL of habitable rooms to below 45 dB. Sound levels will be measured using aircraft as the noise source or simulation methods (loudspeaker(s)). Property owners will be required to sign an avigation easement, guaranteeing the right of flight over a residence, as a requirement to participate in the RISP. Upon completion, current owners will be required to disclose the residence was included in the RISP and is subject to an avigation easement. If housing units do not meet the local building codes required to qualify for sound insulation, a homeowner shall be given the option to sell the property. The residence may be resold to a new owner. The housing unit may or may not be sound insulated and/or upgraded prior to resale but will be subject to an avigation easement.				
TRANSPORTATION					
Threshold TRA-2: Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	**MM TRANS-1: Voluntary Commute Reduction Program.** The proposed Project shall implement Voluntary Commute Trip Reduction (CTR) programs that discourage single-occupancy vehicle trips and encourage alternative modes of transportation, such as carpooling, taking transit, walking, and	Applicant	OIAA	During Project operation.	N/A

TABLE 4-1
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Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timeframe/ Monitoring Milestone	Reporting Requirements (if applicable)
	biking. Voluntary CTR programs shall include the following elements to apply the VMT reductions reported in literature: • Employer-provided services, infrastructure, and/or incentives for commuting to work using alternative modes (e.g., walking, biking, carpooling/vanpooling, or taking transit). • Provide information, coordination, and marketing for employee rideshare services, provide onsite infrastructure to support carpools/vanpools, and provide incentives (e.g., free transit passes, monthly bonus for carpooling 3 or more times a week, etc.). Employer costs may include recurring costs for carpool/vanpool subsidies, capital and maintenance costs for the alternative transportation infrastructure (e.g., showers and lockers), and labor costs for staff to manage the program.				
	MM TRANS-2: Provide Ridesharing Program. A ridesharing program shall be implemented for employees of the site. The following elements designed to support the Project's ridesharing program: • Provide vanpool parking with designated passenger loading/unloading area near employee entrance. • Create a Carpool Incentive Program. – Provide a minimum of ten (10) carpool parking spaces provided closer to the employee entrance than standard parking spaces. – Provide access to a carpool database (Metro rideshare) and/or an on-site matching program for employees.	Applicant	OIAA	During Project operation.	N/A

TABLE 4-1
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	– Provide a monthly incentive for employees that carpool a minimum of three (3) days per week (e.g., $50 gas card or a $50 green commuter bonus). In addition, a staff person would be designated to for provide rideshare information to employees and monitoring the effectiveness of the program. It is assumed all employees are eligible and that additional carpool spaces could be designated if warranted by demand.				
	MM TRANS-3: Implement Subsidized or Discounted Transit Program. Subsidized, discounted, or free Omnitrans, Metrolink or Amtrak transit passes shall be provided to employees to encourage use of transit routes/stops located less than a mile from the Project. It is assumed free transit passes are available to all employees. Based on the given shift times of the Project, shifts that start or end at 11:00 PM shall have limited available options as most routes do not provide service that late. This shall limit approximately half the employees from the ability to rely on transit.	Applicant	OIAA	During Project operation.	N/A
	MM TRANS-4: Bicycle Facilities. On-site bicycle parking and end-of-trip facilities shall be provided for employee use. End-of-trip facilities include bike parking, bike lockers, showers, and personal lockers. A bike share program (standard or electric bikes) for employees shall supplement bicycle facilities.	Applicant	OIAA	During Project operation.	N/A
	MM TRANS-5: Employer-Sponsored Vanpool Program. An employer-sponsored vanpool service shall be implemented and be fully funded by the tenant as follows:	Applicant	OIAA	During Project operation.	N/A

TABLE 4-1
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Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timeframe/ Monitoring Milestone	Reporting Requirements (if applicable)
	• Provide a minimum of one (1) and up to three (3) vanpool vehicles and associated parking with designated passenger loading/unloading area near employee entrance. • Pay for the lease of a minimum of one (1) van and up to three (3) vans for the purpose of employee vanpooling. .3 • A ten percent voluntary participation rate is assumed to be the high end of the range for this project.				
TRIBAL CULTURAL RESOURCES					
Threshold TRI-1: Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:					
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	Implementation of **MM CUL-1**.	See above under Threshold CUL-2.	See above under Threshold CUL-2.	See above under Threshold CUL-2.	See above under Threshold CUL-2.
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence,	**MM TCR-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities.**	OIAA and appropriate	Approved Native	Prior to ground disturbing activities.	• Executed monitoring agreement

TABLE 4-1
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Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timeframe/ Monitoring Milestone	Reporting Requirements (if applicable)
to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	a. The project applicant/lead agency shall retain a Native American Monitor from or approved by the appropriate Native American Tribe(s). The monitor shall be retained prior to the commencement of any ground-disturbing activity for the subject project at all project locations (i.e., both onsite and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching. b. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity. c. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the proposed Project	Native American Tribe(s).	American Monitor.		• Daily monitoring logs performed by the approved Native American Monitor • (1) Written confirmation to the appropriate Native American Tribe(s) from a designated point of contact for the proposed Project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) A determination and written notification by the appropriate Native American Tribe(s) to the proposed Project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the Project site possesses the potential to impact Native American Tribe TCRs.

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Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timeframe/ Monitoring Milestone	Reporting Requirements (if applicable)
	applicant/lead agency upon written request to the appropriate Native American Tribe(s). d. On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the appropriate Native American Tribe(s) from a designated point of contact for the proposed Project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the appropriate Native American Tribe(s) to the proposed Project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the Project site possesses the potential to impact Native American Tribe TCRs. e. Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Native American monitor and/or Native American archaeologist. The appropriate Native American Tribe(s) will recover and retain all discovered TCRs in the form and/or manner the Native American Tribe(s) deem appropriate, in the Tribe's sole discretion, and for any purpose the Native American Tribe(s) deem appropriate, including for educational, cultural and/or historic purposes.				
	MM TCR-2: Unanticipated Discovery of Human Remains and Associated Funerary Objects. a. Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any	OIAA and appropriate Native American Tribe(s).	Approved Native American Monitor.	During ground-disturbing activities, if Native American	N/A

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MITIGATION MONITORING AND REPORTING PROGRAM

Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timeframe/ Monitoring Milestone	Reporting Requirements (if applicable)
	state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute. b. If Native American human remains and/or grave goods discovered or recognized on the project site, then all construction activities shall immediately cease. Health and Safety Code Section 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and all ground-disturbing activities shall immediately halt and shall remain halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe they are Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission, and Public Resources Code Section 5097.98 shall be followed. c. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2). d. Construction activities may resume in other parts of the Project site at a minimum of 200 feet away from discovered human remains and/or burial goods, if the appropriate Native American Tribe(s) determine in its sole discretion that resuming construction activities at that distance is acceptable and provides the project manager express consent of that determination (along with any other mitigation measures the appropriate Native American Tribe(s) and/or archaeologist deems necessary). (CEQA Guidelines Section 15064.5(f)).			human remains are found.	

TABLE 4-1
MITIGATION MONITORING AND REPORTING PROGRAM

Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timeframe/ Monitoring Milestone	Reporting Requirements (if applicable)
	e. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods, if feasible. Any historic archaeological material that is not Native American in origin (non-TCR) shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes. f. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.				
	MM TCR-3: Procedures for Burials and Funerary Remains. a. The appropriate Native American Tribe(s) burial policy shall be implemented. b. If the discovery of human remains includes four or more burials, the discovery location shall be treated as a cemetery and a separate treatment plan shall be created. c. The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects. Cremations will either be removed in bulk or by means as necessary to ensure complete recovery of all sacred materials.	OIAA and appropriate Native American Tribe(s).	Approved Native American Monitor.	During ground-disturbing activities, if Native American human remains are found.	• Treatment Plan for cemetery, if applicable. • Documentation including detailed descriptive notes and sketches of the tribal resources discovered.

TABLE 4-1
MITIGATION MONITORING AND REPORTING PROGRAM

Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timeframe/ Monitoring Milestone	Reporting Requirements (if applicable)
	d. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours. The Tribe will make every effort to recommend diverting the project and keeping the remains in situ and protected. If the project cannot be diverted, it may be determined that burials will be removed. e. In the event preservation in place is not possible despite good faith efforts by the proposed Project applicant/developer and/or landowner, before ground-disturbing activities may resume on the Project site, the landowner shall arrange a designated site location within the footprint of the proposed Project for the respectful reburial of the human remains and/or ceremonial objects. f. Each occurrence of human remains and associated funerary objects will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony will be removed to a secure container on site if possible. These items should be retained and reburied within six months of recovery. The site of reburial/repatriation shall be on the project site but at a location agreed upon between the Tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered. The proposed Project's qualified archaeologist will work closely with the appropriate Native American Tribe(s) to ensure				

TABLE 4-1
MITIGATION MONITORING AND REPORTING PROGRAM

Impact	Mitigation Measures	Implementing Party	Monitoring Party	Timeframe/ Monitoring Milestone	Reporting Requirements (if applicable)
	that the excavation is treated carefully, ethically and respectfully. If data recovery is approved by the appropriate Native American Tribe(s), documentation shall be prepared and shall include (at a minimum) detailed descriptive notes and sketches. All data recovery data recovery-related forms of documentation shall be approved in advance by the appropriate Native American Tribe(s). If any data recovery is performed, once complete, a final report shall be submitted to the appropriate Native American Tribe(s) and the NAHC.				

TABLE 4-2
PROJECT DESIGN FEATURES

Project Design Features		Implementing Party	Monitoring Party	Timeframe/Monitoring Milestone	Reporting Requirements (if applicable)
AIR QUALITY					
PDF AQ-1:	For all phases of construction activity, the Applicant shall require use of off road-construction equipment that is zero emission, if and to the extent available, or diesel-fueled off-road construction equipment that meets the USEPA's Tier 4 emissions standards for offroad diesel-powered construction equipment with 50 horsepower (hp) or greater. To ensure that Tier 4 or the cleanest construction equipment available would be used during the Project's construction, the OIAA shall confirm that the Applicant includes this requirement in applicable bid documents, purchase orders, and contracts. Additionally, the OIAA shall confirm that the Applicant also requires periodic reporting and provision of written construction documents by construction contractor(s) and conducts regular inspections to the maximum extent feasible to ensure and enforce compliance.	Applicant	OIAA	During construction activities.	• Applicant includes requirement in applicable bid documents, purchase orders, and contracts • Applicant provides periodic reporting and provision of written construction documents by construction contractor(s) • OIAA conducts regular inspections to the maximum extent feasible to ensure and enforce compliance
PDF AQ-2:	The Applicant shall conduct concrete/asphalt demolition on-site to reuse concrete/asphalt generated during construction. During Phase 1, demolition would involve removal of approximately 2,047,320 square feet of asphalt/concrete, which would be recycled within the project site and not require off-site haul truck trips (i.e., avoiding 2,616 haul truck trips). During Phase 2, demolition would involve removal of approximately 1,045,440 square feet of asphalt/concrete, which would be recycled within the project site and not require off-site haul truck trips (i.e., avoiding 910 haul truck trips).	Applicant	OIAA	During construction activities.	• Applicant provides periodic reporting and provision of written construction documents by construction contractor(s) • OIAA conducts regular inspections to the maximum extent feasible to ensure and enforce compliance

TABLE 4-2
PROJECT DESIGN FEATURES

	Project Design Features	Implementing Party	Monitoring Party	Timeframe/Monitoring Milestone	Reporting Requirements (if applicable)
PDF AQ-3:	The Ground Support Equipment (GSE), including (but not limited to) aircraft tugs, baggage tugs, belt loaders, cargo loaders, forklifts, and ground power units, ramp support carts/vans, servicing aircrafts shall be electric by Phase 2.	Applicant & OIAA	OIAA	During construction activities.	• Applicant provides periodic reporting and provision of written construction documents by construction contractor(s) • OIAA conducts regular inspections to the maximum extent feasible to ensure and enforce compliance
PDF AQ-4:	A portion of the proposed Project's aircraft fleet shall include electric cargo aircraft. (See Table 3.4 in Section 3.0: Project Description).	Applicant	OIAA	During operation of the Project.	• Maintain log of aircraft fleet associated with Project operations.
PDF AQ-5:	All new aircraft parking positions shall be equipped with ground power and pre-conditioned air, therefore reducing the need to operate auxiliary power units.	Applicant	OIAA	During operation of the Project.	• Maintain records documenting presence of ground power and pre-conditioned air at all aircraft parking positions.
PDF AQ-6:	The Applicant shall conduct maintenance and/or testing on each of the seven standby generators on separate days to limit daily emissions from maintenance/testing activities.	Applicant	OIAA	During operation of the Project.	• Maintain log of maintenance and/or testing activities associated with standby generators that records dates and details.
PDF AQ-7:	The Air Cargo Sort Building shall meet Leadership in Energy and Environmental Design (LEED) certification standards, shall include enhanced building automation systems, and shall utilize advanced low energy HVAC systems.	Applicant & OIAA	OIAA	Prior to certificate of occupancy.	• Review and approval of permits and plans.
PDF AQ-8:	The visitor parking lot shall include 29 parking stalls, 6 of which shall have access to electric charging points. The employee parking structure shall include 932 parking stalls, 300 of which shall have access to electric charging points.	Applicant	OIAA	Prior to certificate of occupancy.	• Review and approval of permits and plans.

TABLE 4-2
PROJECT DESIGN FEATURES

	Project Design Features	Implementing Party	Monitoring Party	Timeframe/Monitoring Milestone	Reporting Requirements (if applicable)
PDF AQ-9:	The Air Cargo Sort Building shall incorporate all of the following design specifications and technologies: • Building automation • Efficient, heat pump HVAC • Natural ventilation • Purchase of electricity from the SCE 100% Clean Rate Program, if and to the extent feasible • Efficient dock seals • Rapid rise doors • Solar shades • Low use water appliances • Sustainable, drought-tolerant landscaping featuring a native, non-invasive vegetation palette • Submeters with advanced energy monitoring • Main meter energy monitoring • Efficient transformers • Battery storage-ready infrastructure • Building automation by an enhanced building management system • Enhanced glazing	Applicant	OIAA	Prior to certificate of occupancy.	• Review and approval of permits and plans.
PDF AQ-10:	The Project shall include electric charging infrastructure in the truckyard that, at a minimum, accords with all applicable requirements of California's Building Energy Efficiency Standards, as set forth within Title 24, Part 6, of the California Code of Regulations.	Applicant	OIAA	During operation of the Project.	• Review and approval of permits and plans.

TABLE 4-2
PROJECT DESIGN FEATURES

Project Design Features		Implementing Party	Monitoring Party	Timeframe/Monitoring Milestone	Reporting Requirements (if applicable)
PDF AQ-11:	The storage and maintenance of Project-related delivery trucks shall occur only on site. In the event that overnight parking of delivery trucks is necessary, such trucks shall be parked within the Project site.	Applicant	OIAA	During operation of the Project.	• Review and approval of permits and plans.
			GHG		
PDF GHG-1:	The Air Cargo Sort Building shall be all-electric (no natural gas usage).	Applicant	OIAA	Prior to certificate of occupancy.	• Review and approval of permits and plans.
PDF GHG-2:	The proposed Project shall include a 3.8-Megawatt Solar PV Panel System on the rooftop of the Air Cargo Sort Building and Parking Structure.	Applicant	OIAA	Prior to certificate of occupancy.	• Review and approval of permits and plans.