

Appendix A

Notice of Preparation (NOP)

Responses to NOP

MMRP (Pending)



City of Rancho Cucamonga
Notice of Preparation of a Draft EIR
And Notice of Public Scoping Meeting

Date: November 18, 2019

To: Responsible and Trustee Agents/Interested Organizations and Individuals

Subject: **Notice of Preparation of a Draft Environmental Report and Notice of a Public Scoping Meeting
9th & Vineyard Development Project**

Lead Agency:

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

Consulting Firm

KIMLEY-HORN AND ASSOCIATES, INC.
3880 Lemon Street, Suite 420
Riverside, CA 92501
Candyce Burnett

This NOP includes a project description and a list of the environmental issues to be examined in the environmental impact report (EIR).

Due to the time limits mandated by State law, your response must be sent at the earliest possible date, but no later than 30 days after receipt of this notice.

Please send your response to David F. Eoff IV, Senior Planner, at the City of Rancho Cucamonga address shown above. Please include the name, phone number, email, and address of a contact person in your response.

Project Title: 9th & Vineyard Development Project

Location: The Project site is located south of E. 9th Street, directly west of Vineyard Avenue, directly north of the Burlington Northern Santa Fe (BNSF) Railway, and directly east of Baker Avenue in the City of Rancho Cucamonga in San Bernardino County, California. The 47.07-acre site is located approximately 1.4 miles north of the I-10 Freeway/Vineyard Avenue on/off ramp, approximately 2.9 miles south of the SR-210 Freeway/Carnelian Street on/off ramp, and 2.3 miles east of State Route 83.

A. Project Overview CP Logistics Vineyard LLC (CPL) is proposing to develop a site configuration that would include the construction of three warehouse buildings to include approximately 13,000 sf of office space and 1,024,467 sf of warehouse space for a total of 1,037,467 sf. The proposed 9th & Vineyard development Project (proposed Project) is comprised of three warehouse buildings with ancillary office space and associated parking and landscaping on approximately 47.07 acres. **Exhibit 3: Building Site Configuration.**



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The Project site is located on the following nine (9) Assessor Parcel Numbers (APN Nos.):

1. 0207-271-25
2. 0207-271-27
3. 0207-271-39
4. 0207-271-40
5. 0207-271-89
6. 0207-271-93
7. 0207-271-94
8. 0207-271-96
9. 0207-271-97

The Project would require a total of 370 automobile parking spaces and would provide a total of 415 automobile parking spaces. The Project would require 141 trailer parking stalls and would provide 195 total trailer parking spaces. Refer to Table 1 for further breakdown regarding individual parking provided for each building.

Table 1: Three Building Site Summary

Building	Warehouse (sf)	Office 1st Floor (sf)	Office 2 nd Floor (sf)	Total Building (sf)	Automobile Parking Stalls		Trailer Parking Stalls	
					Required	Provided	Required	Provided
Building 1	632,580	4,000	0	636,580	195	195	100	148
Building 2	126,531	2,000	2,000	130,531	68	73	13	13
Building 3	265,356	2,500	2,500	270,356	107	147	28	34

The warehouse distribution buildings are currently planned as “speculative buildings.” Consequently, the future tenants or buyers of the buildings are not currently known. Without knowing the future tenants or buyers, an exact number of future employees or hours of operation cannot be determined. Therefore, the Environmental Impact Report (EIR) and associated technical reports will use approximate potential on-site employees, hours of operation, and vehicular traffic generation based on the Project’s proposed square footage and use as warehouse distribution facilities. A more in-depth analysis in addition to full evaluation of the historic building located near the western project boundary will be provided in the forthcoming Draft EIR.

Landscaping

Proposed landscaping would cover approximately 11.9% or 243,585 sf of the site. Landscaping would be



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installed in all areas not devoted to buildings, parking, traffic and specific user requirements, in accordance with the City's Municipal Code Section 17.36.040 which specifies landscape design guidelines for industrial districts. Building setbacks would be 35 feet along Vineyard Avenue (Secondary Highway) and 25 feet along both 9th Street (Collector Street) and Baker Avenue (Collector Street).

Construction

Construction would include the demolition of existing structures with the exception of the ±1,260 SF building located at 8803 Baker Avenue, which was deemed historically significant by the City, and the existing cell tower located approximately 300 linear feet west of Vineyard Avenue that is compliant with the City of Rancho Cucamonga's Construction and Demolition Diversion Program. CPL will pay the demolition permit and administration fee for cleanup purposes provided by Burrtec Waste Industries. Construction of the proposed Project is expected to commence in August 2020 (est.) with a construction duration of approximately 15 months (including required demolition) and would be completed in one (1) phase with buildout in November 2021 (est.). Total excavation and fill of soils for the proposed Project is anticipated to balance, with no required soil import or export.

B. Project Setting

Adjacent properties to the north are zoned for Industrial Park (IP), General Industrial (GI), Medium Density Residential (M), and General Commercial (GC) uses. Properties to the west are zoned Low Density Residential (L). The BNSF railway and properties zoned for industrial uses directly south of the site are located within the City of Ontario. The site is bordered to the east by Vineyard Avenue and the Cucamonga Creek, a concrete-lined stormwater drainage channel. Cucamonga Creek originates in the San Gabriel Mountains to the north of the site and flows roughly north to south into the Santa Ana River at the Prado Dam.

C. Requested Project Approvals

Project entitlement will include the following applications:

- **Design Review (DR)(DRC2019-00742):** The application includes the proposed review of three (3) industrial buildings totaling approximately 1,037,467 square feet that range in size from 130,531 to 636,580 square feet on approximately 47.07 acres.
- **Tentative Parcel Map (TPM)(SUBTPM20173):** The application includes the proposed review of a collapse of the nine (9) existing parcels into three (3) proposed parcels, along with the required land dedications, vacations and easements.
- **General Plan Amendment (GPA)(DRC2019-00851):** The application includes the review of a proposed amendment of the land use designation of approximately 7.06 acres located at the southwest corner of the site fronting Baker Avenue, between APN No. 0207-271-89 to the north and the BNSF Railway to the south, from General Industrial to Industrial Park.



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- **Zoning Map Amendment (ZMA)(DRC2019-00852):** The application includes the review of a proposed amendment of the zoning designation of approximately 7.06 acres located at the southwest corner of the site fronting Baker Avenue, between APN No. 0207-271-89 to the north and the BNSF Railway to the south, from General Industrial (GI) to Industrial Park (IP).
- **Uniform Sign Program (USP)(DRC2019-00855):** The application includes the review of a Uniform Sign Program which governs the design and construction of all planned and future signage at the proposed Project.
- **Tree Removal Permit (DRC2019-00853):** The application includes the review of the proposed removal of approximately one hundred ninety seven (197) trees on the site, of which seventy one (71) are considered “heritage trees” by the City. These trees will be replaced by approximately five hundred and one (501) new trees as part of the proposed Project.
- **Certificate of Appropriateness (DRC2019-00854):** The application includes the review of the proposed rehabilitation of the historically significant ±1,260 square foot building located at 8803 Baker Avenue.
- **Notice of Filing Sign Permit (DRC2019-00756):** The application includes the request to install signs on the site in order to properly notice the public of upcoming public hearings for the Project.

D. Project Characteristics

General Plan Designation: The majority of the Project site is designated as General Industrial with the exception of approximately 5.71 acres at the northwest corner of the site fronting Baker Avenue (APN No. 0207-271-89) which is designated as Industrial Park.

Zoning: The majority of the Project site is zoned as General Industrial (GI) with the exception of approximately 5.71 acres at the northwest corner of the site fronting Baker Avenue (APN No. 0207-271-89) which is zoned as Industrial Park (IP). The site is not currently governed by a Specific Plan.

E. Circulation and Parking

Vehicular access to the proposed Project would consist of six project driveways, one on 9th Street, two on Vineyard Avenue, and three on Baker Avenue. All entrances to the site would be unsignalized. Street improvements would also be provided along Vineyard Ave, E. 9th Street, and Baker Ave at the Project frontage to include improvements which may consist of the following: sidewalk, parkway landscaping, curb & gutter, dry utility undergrounding, street lights, fire hydrants, traffic signal equipment (offsite intersections), rehabilitation of existing asphalt pavement, offsite utility connections, and signing and striping as required. As shown in **Exhibit 3 – Building Site Configuration** and **Table 1 – Three Building Site Summary** (shown above), the proposed Project would meet the parking requirements for all proposed



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buildings.

Environmental Issues to be Evaluated in the EIR

Pursuant to Section 21165 of the California Public Resources Code and Section 15050 of the California Environmental Quality Act (CEQA) Guidelines, the City of Rancho Cucamonga will be the lead agency for an environmental impact report (EIR) that will be prepared to address potential impacts associated with the proposed 9th and Vineyard Development Project. CEQA Guidelines §15063 provide that if a lead agency determines that an EIR will clearly be required for a project, an Initial Study is not required. In this case, the City has already determined that an EIR will need to be prepared based on the Project's potential to create short-term, long-term and cumulative impacts associated with other developments. Therefore, an EIR will be prepared to fully evaluate the potential impacts of the proposed Project. The EIR will be comprehensive in nature evaluating all identified issues from the 2019 CEQA Initial Study Checklist.

The following issues are anticipated to be addressed in the EIR:

- Aesthetics • Agriculture and Forestry Resources • Air Quality • Biological Resources • Cultural Resources
- Energy • Geology and Soils • Greenhouse Gas Emissions • Hazards and Hazardous Materials • Hydrology and Water Quality • Land Use and Planning • Mineral Resources • Noise • Population and Housing • Public Services • Recreation • Transportation • Tribal Cultural Resources • Utilities and Service Systems • Wildfire

The EIR will address the short- and long-term effects of the Project on the environment, including the impacts of any off-site improvements. It will also evaluate the potential for the Project to cause direct and indirect growth-inducing impacts, as well as cumulative impacts. Alternatives to the proposed Project will be evaluated that may reduce impacts that are determined to be significant in the EIR. Mitigation may be proposed for those impacts that are determined to be significant. A mitigation monitoring program will also be developed as required by §15097 of the CEQA Guidelines. The environmental determination in this Notice of Preparation is subject to a 30-day public review period per Public Resources §21080.4 and CEQA Guidelines §15082. Public agencies, interested organizations, and individuals have the opportunity to comment on the proposed Project, to identify those environmental issues potentially affected by the Project which should be addressed further by the City of Rancho Cucamonga in the EIR.

As they are completed and distributed, the EIR/Environmental Documentation for the Project will be made available to download from the City's website: www.cityofrc.us



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The EIR/Environmental Documentation will be made available for review Monday through Thursday, between 7:00 AM and 6:00 PM at the following location:

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

Public Review Period

CEQA requires a 30-day public review period for an NOP. In accordance with CEQA, should you have any comments, please provide a written response to this NOP within the 30-day NOP period between **November 19, 2019 through December 18, 2019**.

The City is requesting comments and guidance on the scope and content of the EIR from Responsible and Trustee agencies, interested public agencies, organizations, and the general public (pursuant to CEQA Guidelines §15082). All parties that have submitted their names and mailing addresses will be notified as part of the Project's CEQA review process. If you wish to be placed on the mailing list or have any questions or need additional information, please contact the lead agency contact noted below.

Agencies: The City requests each Responsible and Trustee agency's views on the scope and content of environmental issues relevant to your agency's statutory responsibilities in connection with the proposed Project, in a manner consistent with California Code of Regulations, Title 14, Section 15082(b). Your agency may use the EIR prepared by the City when considering any permits that your agency must issue, or other approvals for the Project.

Public Comments

The City requests your careful review and consideration of this notice, and invites **written comments** from interested agencies, persons, and organizations regarding the preparation of the EIR. Please indicate a contact person for your agency or organization. Please send your written comments to:

Attn: David F. Eoff IV, Senior Planner
City of Rancho Cucamonga
Planning Department
10500 Civic Center Drive
Rancho Cucamonga, CA 91730
Phone: (909) 774-4312
Email: david.eoff@cityofrc.us



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Please include the name, phone number, email, and address of a contact person in your response.

You may also provide oral or written comments in person at the **Scoping Meeting** noted below. Comments in response to this notice must be submitted to the City through close of business (5:00 PM) on December 19, 2019.

Public Scoping Meeting

The City will have a Scoping Meeting to present updates to the Project and the CEQA process, and to receive public comments and suggestions regarding the scope and content of the EIR. The meeting will be held at the following location, date and time:

Date: December 12, 2019

Location: City of Rancho Cucamonga
Rancho Cucamonga Civic Center, Tri-Communities Room
10500 Civic Center Drive
Rancho Cucamonga, CA 91730

Time: 6:30 PM

Special Accommodations. Should you require special accommodations at the public scoping meeting, such as for the hearing impaired or an English translator, please contact the City of Rancho Cucamonga no later than December 2, 2019 (see contact information above).

Attachments:

Exhibit 1 – Regional Map

Exhibit 2 – Local Vicinity Map

Exhibit 3 – Building Site Configuration



CITY OF RANCHO CUCAMONGA

10500 Civic Center Drive | Rancho Cucamonga, CA 91730 | 909.477.2700 | www.CityofRC.us

NOTICE OF PUBLIC SCOPING MEETING AND PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT

Notice is Hereby Given that a public scoping meeting will be held on December 12, 2019 at 6:30 PM at 10500 Civic Center Drive, Rancho Cucamonga, CA 91730 in The Rains conference room inside City Hall.

The Planning Department has received an application to construct 1,037,467 square feet of industrial warehouse space. The development is comprised of three warehouse buildings with ancillary office space, associated parking and landscaping on roughly 47.07 acres of land. The project site is located south of 9th Street, directly west of Vineyard Avenue, directly north of the Burlington Northern Santa Fe (BNSF) Railway, and directly east of Baker Avenue.

In compliance with the California Environmental Quality Act (CEQA), the City (as the Lead Agency) has determined that an Environmental Impact Report (EIR) will need to be prepared to fully evaluate the potential impacts of the proposed project. The EIR will be comprehensive in nature evaluating all identified issues from the 2019 CEQA Initial Study Checklist. The City of Rancho Cucamonga invites you to submit your written views regarding the scope of environmental issues recommended to be addressed in the EIR, and to seek your comments on what environmental effects and alternatives the EIR should study. Oral or written comments may be provided in person at the Scoping Meeting noted above. Written comments may also be provide by mail to:

City of Rancho Cucamonga Planning Department
Attn: David F. Eoff IV, Senior Planner
10500 Civic Center Drive
Rancho Cucamonga, CA 91730

Or by email to David.Eoff@cityofrc.us.

No decision on the project will be made at this time. The purpose of the Scoping Meeting is to receive public comment regarding the preparation of the EIR only. Additional correspondence on future meetings and public hearings will be provided at a later date prior to any decisions being made on the project. Comments and responses provided by mail or email must be received no later than 5:00 PM on December 19, 2019.

If you have any questions or concerns regarding this project or this meeting, you may contact David F. Eoff IV, Senior Planner, at 909-774-4312 or by email at David.Eoff@cityofrc.us, Monday through Thursday, between the hours of 7:00 AM and 6:00 PM.

PROJECT CASE NO.: DRC 2019-00742 (9th and Vineyard Project)

DATE NOTICE MAILED: December 3, 2019



1300 I STREET, SUITE 125
P.O. BOX 944255
SACRAMENTO, CA 94244-2550

Public: (916) 445-9555
Telephone: (916) 210-6384
Facsimile: (916) 327-2319
E-Mail: Jessica.Wall@doj.ca.gov

February 11, 2020

David F. Eoff
Senior Planner
City of Rancho Cucamonga Planning Department
10500 Civic Center Drive
Rancho Cucamonga, CA 91730

RE: Notice of Preparation for the 9th & Vineyard Development Project (SCH # 2019110456)

Dear Mr. Eoff:

Thank you for the opportunity to provide comments on the City of Rancho Cucamonga's Notice of Preparation (NOP) for the 9th & Vineyard Development Project ("the Project"). The NOP indicates that the City seeks comments regarding environmental concerns from the implementation of this Project located on East 9th Street, west of Vineyard Avenue in the City of Rancho Cucamonga in San Bernardino County. The Project would allow the development of three warehouse buildings totaling more than 1 million square feet near homes, schools, and a park. Given the Project's setting in a community of color that already suffers some of the worst pollution in the State, we submit these comments for the City's consideration as it prepares the draft environmental impact report (EIR).¹

I. THE PROJECT

The Project would allow the development of approximately 47 acres into more than 1 million square feet of warehouses, with 141 dock doors for trucks to load and unload. The Project is expected to have 415 parking spots for cars and 195 parking spots for truck trailers. While the NOP does not say, warehouse projects typically operate 24 hours a day, seven days a week. The NOP also does not disclose whether the facilities will include refrigerated uses. Cold storage warehouses require diesel trucks with transport refrigeration units (TRUs), which emit significantly higher levels of toxic diesel particulate matter (PM), nitrogen oxides (NO_x), and greenhouse gas emissions than trucks without TRUs. The Project site is zoned for industrial use and presently consists of a mixture of vacant land and older structures.

¹ The Attorney General submits these comments pursuant to his independent power and duty to protect the environment and natural resources of the State. (*See* Cal. Const., art. V, § 13; Gov. Code, §§ 12511, 12600–12; *D'Amico v. Bd. of Medical Examiners* (1974) 11 Cal.3d 1, 14–15.)

II. THE PROJECT SITE IS SURROUNDED BY SENSITIVE RECEPTORS ALREADY EXPOSED TO SIGNIFICANT POLLUTION BURDENS.

The Project would allow for the development of a large warehouse complex adjacent to hundreds of residential homes on three sides and within 500 feet of two elementary schools and a preschool that predominately serve low income students and students of color.² An additional four schools are located in the adjacent neighborhood, as well as a skate park. (See Appendix A.) While directly south of the Project site, there are some railroad tracks and a narrow strip of auto repair facilities, beyond those facilities is a large residential neighborhood in the City of Ontario. To the west and northwest of the Project are more homes and apartments. A drainage channel borders the Project site on the eastern boundary, beyond which are other industrial uses. According to the most recent data from the American Community Study, 1,972 people live within roughly 1,000 feet of the Project site.³

According to CalEnviroScreen 3.0, CalEPA's screening tool that ranks each census tract in the state for pollution and vulnerability, the residential area immediately south of the Project site, located in the City of Ontario, ranks worse than 90–95% of the state. About 86% of the residents of this community are people of color and 78% of them are Latinx. This community already faces considerable air quality pollution. It is in the 91st percentile for ozone pollution, 93rd percentile for PM_{2.5} pollution, 94th percentile for diesel pollution, and 80th percentile for toxic chemical releases.⁴ This Project would further add to the environmental and health problems faced by the families that live in this region.

III. THE CITY MUST COMPREHENSIVELY EVALUATE THE PROJECT'S ENVIRONMENTAL IMPACTS, INCLUDING CUMULATIVE IMPACTS ON SENSITIVE RECEPTORS.

The purpose of CEQA is to ensure that a lead agency fully evaluates, discloses, and, whenever feasible, mitigates a project's significant environmental effects.⁵ An EIR serves as an "informational document" that informs the public and decisionmakers of the significant

² San Antonio Christian School is a private elementary school that has 46 students, 91.3% of whom are people of color. National Center for Education Statistics, *available at* <https://nces.ed.gov/ccd/schoolsearch/> (as of December 31, 2019). Los Amigos Elementary has 526 students, 94.87% of whom are people of color and 81.37% qualify for free or reduced price lunches. National Center for Education Statistics, *available at* <https://nces.ed.gov/ccd/schoolsearch/> (as of December 31, 2019). Children's Montessori School is a school and daycare that educates children ages 2–12. *See* <http://childrensmontessorica.com/> (as of January 3, 2020).

³ *Environmental Protection Agency, EJSCREEN*, <<https://ejscreen.epa.gov/mapper/demogreportpdf.aspx?report=acs2017>> (as of Dec. 30, 2019).

⁴ In CalEnviroScreen, a census tract with a high score is one that experiences a higher pollution burden than one with a low score.

⁵ Pub. Resources Code, §§ 21000–21002.1.

environmental effects of a project and ways in which those effects can be minimized.⁶ CEQA requires an EIR to include “enough detail ‘to enable those who did not participate in its preparation to understand and to consider meaningfully the issues raised by the proposed project.’ ”⁷ In the context of air quality analysis, an EIR must “make[] a reasonable effort to substantively connect a project’s air quality impacts to likely health consequences.”⁸

The City’s EIR must analyze the full environmental impacts of the Project, which will add a considerable number of diesel truck trips, and their attendant air pollution, to this already overburdened area. That includes the Project’s impact on the sensitive receptors that surround the Project to the north and south who already suffer the health impacts of environmental pollution.⁹ The area is a non-attainment area for ozone and particulate matter and Project operations will likely increase emissions of those pollutants.

The City also must sufficiently relate pollutant data to specific adverse human health effects in the Project’s EIR. The California Supreme Court recently found a project’s air quality impact analysis to be inadequate under CEQA because its “general description of symptoms that are associated with exposure” “fail[ed] to indicate the concentrations at which such pollutants would trigger the identified symptoms” and did not provide the public with an “idea of the health consequences that result when more pollutants are added to a nonattainment basin.”¹⁰ The Project’s EIR can avoid this problem by detailing the existing conditions and projecting the impact that additional pollution will have on the community.

For instance, studies have shown that increases in near-roadway air pollution are associated with reduced lung function in non-asthmatic children.¹¹ Exposure may be particularly harmful during the first year of life, resulting in decreased lung function into adolescence.¹²

⁶ CEQA Guidelines, § 15121, subd. (a).

⁷ *Sierra Club v. County of Fresno [Friant Ranch]* (2018) 6 Cal.5th 502, 516.

⁸ *Ibid.* at p. 510.

⁹ Because sensitive receptors are uniquely vulnerable to the health effects of environmental damage, CARB recommends 1,000 feet separation between sensitive receptors and distribution centers or other land uses that would generate more than 100 trucks per day. (California Air Resources Board, *Air Quality and Land Use Handbook: A Community Health Perspective* (April 2005) (“CARB Handbook”), p. 4.)

¹⁰ *Friant Ranch*, *supra*, 6 Cal.5th at p. 519.

¹¹ Urman, et al., *Associations of Children’s Lung Function with Ambient Air Pollution: Joint Effects of Regional and Near-Roadway Pollutants* (2014) 69 *Thorax* 540, 546; Chen, et al., *Chronic Effects of Air Pollution On Respiratory Health in Southern California Children: Findings from The Southern California Children’s Health Study* (2015) 7 *Journal of Thoracic Disease* 46, 49.

¹² Schultz, et al., *Early-Life Exposure to Traffic-Related Air Pollution and Lung Function in Adolescence* (2016) 193 *American Journal of Respiratory and Critical Care Medicine* 171, 174–75; Usemann, et al., *Exposure to Moderate Air Pollution and Associations with Lung Function at School-Age: A Birth Cohort Study* (2019) 126 *Environment International* 682, 688.

Increased NO_x emissions are also associated with an increased risk of developing asthma.¹³ Human health is not the only potential impact from Project-generated air emissions. Chronic exposure to air pollution may negatively influence children's cognitive processing and memory.¹⁴ Since the Project seeks to build near elementary schools, a preschool, and a park, the EIR should account for the Project's cumulative impacts on the community.

IV. THE CITY SHOULD CONSIDER ALL FEASIBLE MEASURES TO MITIGATE ANY POTENTIALLY SIGNIFICANT PROJECT IMPACTS

CEQA requires a lead agency to adopt all feasible mitigation measures that minimize the significant environmental impacts of a project.¹⁵ The lead agency is expected to develop mitigation in an open public process,¹⁶ and mitigation measures must be fully enforceable and nondeferrable.¹⁷ To the extent the EIR determines the Project will have significant environmental impacts—especially any affecting sensitive receptors—the City should consider robust mitigation measures to avoid or limit those impacts.

For example, a non-exhaustive list of possible air quality mitigation measures¹⁸ includes:

- Requiring buffer zones of at least 1,000 feet between warehouses and sensitive receptors;
- Ensuring that operations of diesel trucks or equipment on site are as far from sensitive receptors as possible;
- Limiting operation and construction days and times;
- Establishing and enforcing truck routes that avoid sensitive receptors;
- Requiring special consideration and mitigation for warehouses with cold storage capability, including requiring the use of zero-emission or all-electric, plug-in capable TRUs;
- Establishing fleet requirements for warehouse tenants and carriers serving tenants, such as requiring the exclusive use of zero-emission delivery trucks and vans and requiring

¹³ Gauderman, et. al., *Childhood Asthma And Exposure To Traffic And Nitrogen Dioxide* (2005) 16 *Epidemiology* 737, 742; Nishimura, et al., *Early-Life Air Pollution and Asthma Risk in Minority Children. The GALA II and SAGE II Studies* (2013) 188 *American Journal of Respiratory and Critical Care Medicine* 309, 312.

¹⁴ Grineski, et al., *Hazardous Air Pollutants Are Associated With Worse Performance In Reading, Math, And Science Among US Primary Schoolchildren* (2019) *Environmental Research* 108925.

¹⁵ Pub. Resources Code, § 21100, subd. (b)(3).

¹⁶ *Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 93.

¹⁷ CEQA Guidelines, § 15126.4

¹⁸ For more in-depth information about potential air quality mitigation measures near high volume roadways, see CARB's Technical Advisory on the topic and, more generally, the CARB Handbook, which offers more mitigation ideas. Both are available at <https://www.arb.ca.gov/ch/landuse.htm>. The mitigation measures included here are focused on air quality; however, additional mitigation measures may be necessary for traffic, noise, or other significant impacts.

- any Class 8 trucks entering the site use zero-emissions technology or meet CARB's lowest optional NO_x emissions standard;
- Requiring installation of indoor air filtration at nearby residences;
 - Requiring installation of indoor air filtration and climate control at the warehouse to reduce-impacts on workers;
 - Requiring electric vehicle charging infrastructure for both cars and trucks necessary to support zero-emission vehicles and equipment on site;
 - Requiring and enforcing no idling policies;
 - Requiring the use of electric-powered yard equipment onsite;
 - Requiring that all construction equipment meet Tier 4 emission standards;
 - Constructing new or improved transit stops, sidewalks, bicycle lanes, crosswalks, and traffic control or traffic safety measures, such as speed bumps or speed limits;
 - Improving vegetation and tree canopy for community members in and around the Project site;
 - Requiring methods to reduce employee vehicle traffic, such as van shuttles, transit and carpool incentives, and bicycle parking and facilities for employees;
 - Requiring installation of solar panels with backup energy storage on each building roof area with a capacity that matches the maximum allowed for distributed solar connections to the grid;
 - Adhering to California green building standards; and
 - Constructing the warehouse to meet Leadership in Energy and Environmental Design standards.

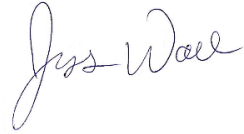
Mitigation measures like these have been adopted by similar projects throughout California. The Attorney General's Office would be happy to provide any assistance it can as the City considers how best to mitigate the Project's environmental impacts.

V. CONCLUSION

This Project's EIR affords the City the opportunity to serve its constituents by transparently evaluating, disclosing, and mitigating the environmental impacts of this proposed Project. When implemented well, CEQA builds public trust and promotes sustainable development that will serve the local community for years to come. The Project could result in a large expansion of industrial uses in Rancho Cucamonga, along with those uses' environmental impacts. The City is correct that a project of this size and potential impacts necessitates an EIR. In drafting the EIR, we urge the City to identify and evaluate the Project's impacts comprehensively, particularly those affecting the many nearby sensitive receptors. CEQA entitles this already-overburdened community to full disclosure and mitigation of the environmental impacts of the Project prior to its approval.

Please do not hesitate to contact me if you have any questions or would like to discuss these issues further.

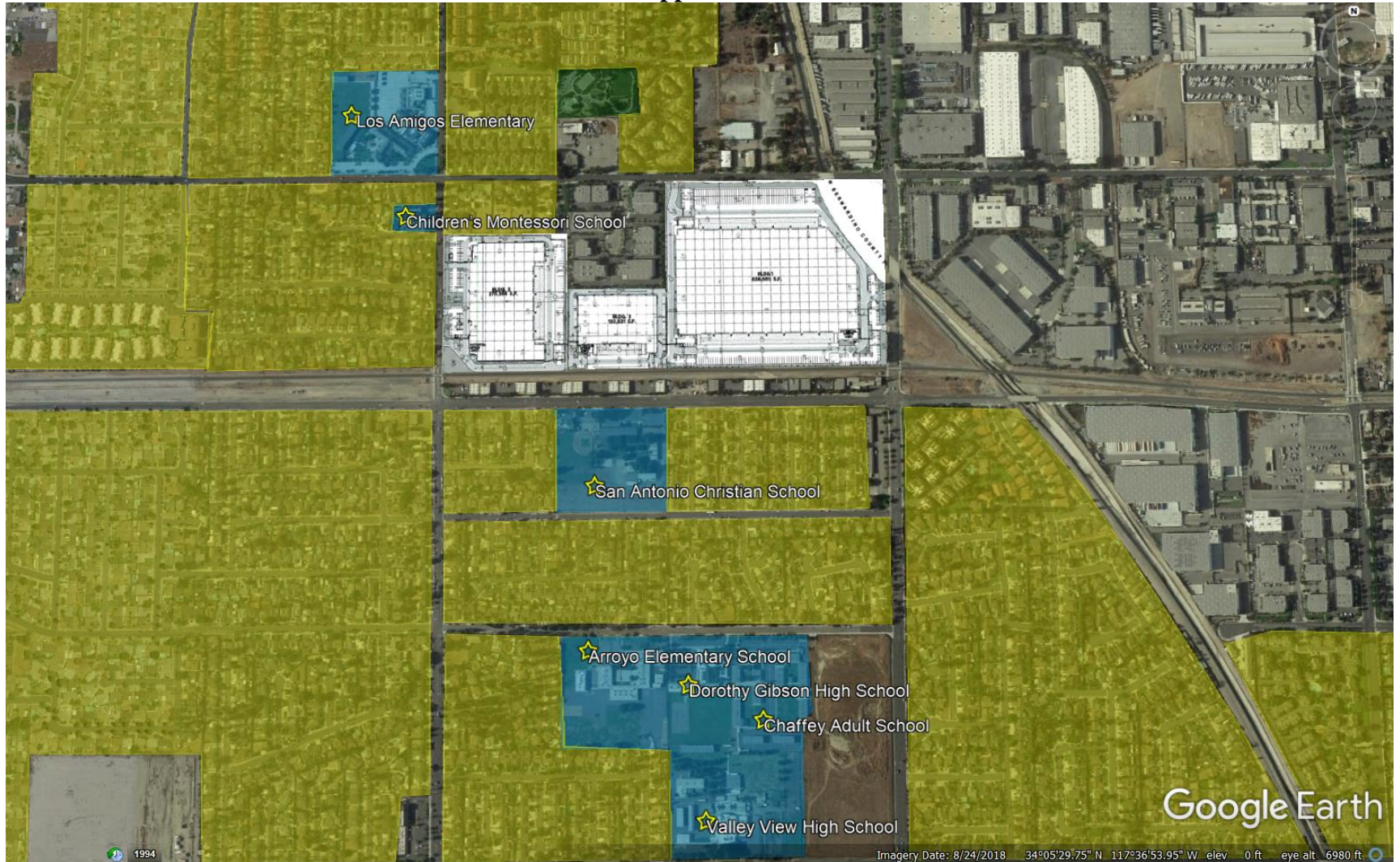
Sincerely,

A handwritten signature in cursive script that reads "Jess Wall". The signature is written in black ink and is positioned above the printed name.

JESSICA WALL
Deputy Attorney General

For XAVIER BECERRA
Attorney General

Appendix:



**Satellite Image of Project Area with Blueprint of Proposed Warehouses,
Existing Residential in Yellow, Schools in Blue, and Parks in Green**