

## **Appendix B1    NOP EIR Comments**

## Appendices

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**From:** Thomas Grahn <[TGrahn@ontarioca.gov](mailto:TGrahn@ontarioca.gov)>  
**Sent:** Tuesday, November 14, 2023 10:09 AM  
**To:** Kimberly Ruddins <[Kruddins@ontarioca.gov](mailto:Kruddins@ontarioca.gov)>; Nicole Vermilion <[nvermilion@placeworks.com](mailto:nvermilion@placeworks.com)>  
**Subject:** Fwd: Ontario Regional Sports Complex

- Tom

Begin forwarded message:

**From:** CEQAReview <[ceqareview@dtsc.ca.gov](mailto:ceqareview@dtsc.ca.gov)>  
**Date:** November 14, 2023 at 7:41:47 AM PST  
**To:** Thomas Grahn <[TGrahn@ontarioca.gov](mailto:TGrahn@ontarioca.gov)>  
**Cc:** "Purvis, Tamara@DTSC" <[Tamara.Purvis@dtsc.ca.gov](mailto:Tamara.Purvis@dtsc.ca.gov)>, "Wiley, Scott@DTSC" <[Scott.Wiley@dtsc.ca.gov](mailto:Scott.Wiley@dtsc.ca.gov)>  
**Subject:** Ontario Regional Sports Complex

Hi Thomas Grahn-

The Department of Toxic Substances Control received the NOP of the DEIR with a State Clearinghouse number of 2023110328. Our records indicate that there is also a similar project (difference of 9 acres in the project description) with a State Clearinghouse of 2006111009. The 2006 project was part of the Armstrong Specific Plan, and the 2023 description did not mention it. Is this the reason it became a new project? Should we reference the two SCH #'s as one project or should we expect the 2006 project to have its own DEIR forthcoming?

Thanks for your response and reach out if you would like more clarification of my inquiry!



[\[dtsc.ca.gov\]](http://dtsc.ca.gov)

**Dave Kereazis**

Associate Environmental  
Planner  
HWMP-Permitting (CEQA  
Unit)

916-255-6446

[Dave.Kereazis@dtsc.ca.gov](mailto:Dave.Kereazis@dtsc.ca.gov)

Department of Toxic  
Substances Control  
California Environmental  
Protection Agency



# NATIVE AMERICAN HERITAGE COMMISSION

November 16, 2023

Governor's Office of Planning &amp; Research

**Nov 17 2023**
**STATE CLEARINGHOUSE**

Thomas Grahn  
City of Ontario  
303 East B Street  
Ontario, CA 91764

**Re: 2023110328, Ontario Regional Sports Complex Project, San Bernardino County**

Dear Mr. Grahn:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b))). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1))). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

**Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.**

AB 52


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Chumash

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Miwok, Nisenan

**NAHC HEADQUARTERS**  
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[NAHC.ca.gov](http://NAHC.ca.gov)

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

**1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:**

Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

- a. A brief description of the project.
- b. The lead agency contact information.
- c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
- d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

**2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:** A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subs. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1 (b)).

- a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

**3. Mandatory Topics of Consultation If Requested by a Tribe:** The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

- a. Alternatives to the project.
- b. Recommended mitigation measures.
- c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).

**4. Discretionary Topics of Consultation:** The following topics are discretionary topics of consultation:

- a. Type of environmental review necessary.
- b. Significance of the tribal cultural resources.
- c. Significance of the project's impacts on tribal cultural resources.
- d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

**5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process:** With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

**6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document:** If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

- a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
- b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- a.** The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
  - b.** A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- a.** Avoidance and preservation of the resources in place, including, but not limited to:
    - i.** Planning and construction to avoid the resources and protect the cultural and natural context.
    - ii.** Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
  - b.** Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
    - i.** Protecting the cultural character and integrity of the resource.
    - ii.** Protecting the traditional use of the resource.
    - iii.** Protecting the confidentiality of the resource.
  - c.** Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
  - d.** Protecting the resource. (Pub. Resource Code §21084.3 (b)).
  - e.** Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
  - f.** Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- a.** The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
  - b.** The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
  - c.** The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: [http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation\\_CalEPAPDF.pdf](http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf)

## SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: [https://www.opr.ca.gov/docs/09\\_14\\_05\\_Updated\\_Guidelines\\_922.pdf](https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf).

Some of SB 18's provisions include:

1. **Tribal Consultation**: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation**. There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality**: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation**: Consultation should be concluded at the point in which:
  - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
  - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

### NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center ([https://ohp.parks.ca.gov/?page\\_id=30331](https://ohp.parks.ca.gov/?page_id=30331)) for an archaeological records search. The records search will determine:
  - a. If part or all of the APE has been previously surveyed for cultural resources.
  - b. If any known cultural resources have already been recorded on or adjacent to the APE.
  - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
  - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
  - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
  - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.



3. Contact the NAHC for:
  - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
  - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
  
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
  - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
  - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
  - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address:  
[Cameron.Vela@nahc.ca.gov](mailto:Cameron.Vela@nahc.ca.gov).

Sincerely,

*Cameron Vela*

Cameron Vela  
Cultural Resources Analyst

cc: State Clearinghouse

**From:** [Thomas Grahn](#)  
**To:** [Nicole Vermilion](#); [Lexie Zimny](#)  
**Cc:** [Moses Kim](#)  
**Subject:** FW: Notice of Preparation (NOP) - Response - Ontario Sports Complex  
**Date:** Monday, December 11, 2023 3:28:52 PM  
**Attachments:** [Outlook-d0uepcxo.png](#)  
[5.1 City of Eastvale - NOP of SEIR Regional Sports Complex Response Letter \(11.16.23\).pdf](#)

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**From:** Allen Lim <[alim@eastvaleca.gov](mailto:alim@eastvaleca.gov)>  
**Sent:** Monday, November 20, 2023 3:56 PM  
**To:** Thomas Grahn <[TGrahn@ontarioca.gov](mailto:TGrahn@ontarioca.gov)>  
**Cc:** Jamie Cerda <[jderca@eastvaleca.gov](mailto:jderca@eastvaleca.gov)>; David Murray <[dmurray@eastvaleca.gov](mailto:dmurray@eastvaleca.gov)>; Gustavo Gonzalez <[ggonzalez@eastvaleca.gov](mailto:ggonzalez@eastvaleca.gov)>  
**Subject:** Notice of Preparation (NOP) - Response - Ontario Sports Complex

Hello Thomas,

Thank you for giving the City of Eastvale the opportunity to review the NOP. Please view the following response letter in regard to the proposed Ontario Regional Sports Complex.

Should you have any questions please feel free to reach out.

Kind Regards,  
Allen



**Allen Lim** | Associate Planner

**CITY OF EASTVALE** | T: 951.361.0900 | D: 951.703.4461  
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# CITY OF EASTVALE

12363 Limonite Avenue | Suite 910 | Eastvale, CA 91752  
951.361.0900

November 20, 2023

Thomas Grahn, Senior Planner  
Ontario Planning Department  
303 East "B" Street  
Ontario, CA 91764

Sent via email to: [tgrahn@ontarioca.gov](mailto:tgrahn@ontarioca.gov)

**RE: NOTICE OF PREPERATION (NOP) AND SCOPING MEETING FOR THE ONTARIO REGIONAL SPORTS COMPLEX  
NON-TIERED ENVIRONMENTAL IMPACT REPORT (EIR) – NOTICE RECEIVED 11.16.23**

Dear Mr. Grahn:

Thank you for the opportunity to comment on the Notice of Preparation (NOP) and Scoping Meeting for the Ontario Regional Sport Complex Non-Tiered Environmental Impact Report (EIR). Eastvale values its relationship with neighboring jurisdictions and is not opposed to development of this site; however, this project has the potential to generate traffic impacts in Ontario and Eastvale. The City of Eastvale offers the following comments for your consideration:

- **Area to be Studied** – According to the Riverside County Transportation Department’s Traffic Impact Analysis (TIA) Guidelines, *the minimum area to be studied shall include any intersection of “Collector” or higher classification street, with “Collector” or higher classification streets, at which the proposed project will add 50 or more peak hour trips, not exceeding a 5-mile radius from the project site. The Transportation Department may require deviation from these requirements based on area conditions.*

Please view the attached exhibit illustrating the intersections that the City of Eastvale requests be included as part of the study area within the TIA. In addition, contribution of fair share costs for any mitigations needed for the applicable intersections (as provided in the attached exhibit), shall also be considered.

- **Draft EIR** - The City of Eastvale will be awaiting to review the Draft EIR for the Ontario Regional Sports Complex.

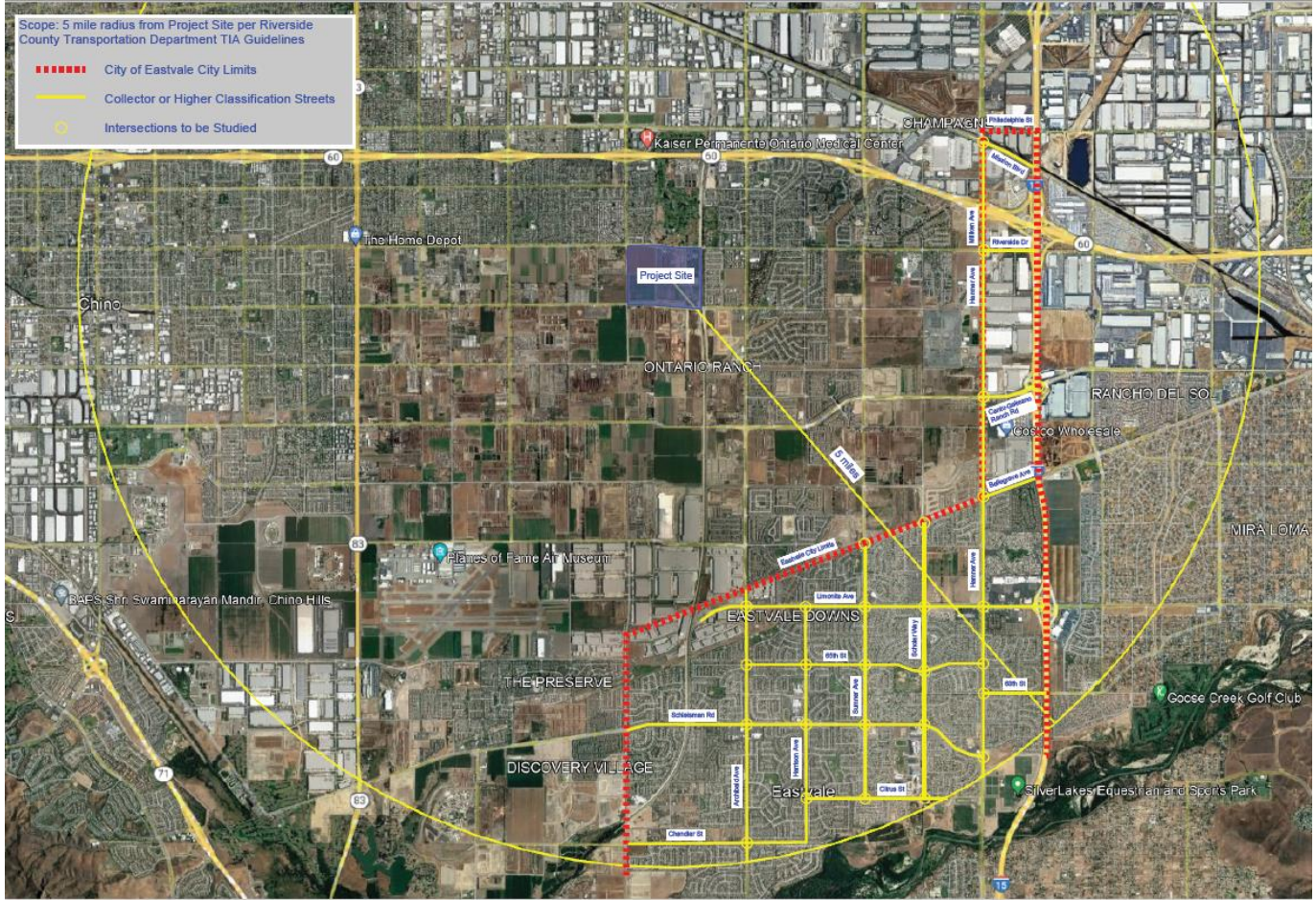
Eastvale staff would like to request a meeting to discuss these comments and potential solutions that address concerns for both cities. Please contact me at (951) 703-4499 or [ggonzalez@eastvaleca.gov](mailto:ggonzalez@eastvaleca.gov) to set a date and time to meet.

We look forward to working cooperatively with the City of Ontario on regional issues that affect our respective communities.

Sincerely,

Gustavo N. Gonzalez, AICP  
Community Development Director

**Exhibit:**



City of Ontario  
City Hall, Planning Department  
Attn: Mr. Thomas Grahn  
303 East "B" Street  
Ontario, CA 91764

November 28, 2023

Dear Mr. Grahn:

I have reviewed the Notice of Preparation for the Ontario Regional Sports Complex, dated November 14, 2023 (SCH Number 2023110328.) Please see the comments below regarding the scope and content to be addressed for the proposed project.

- a. Since the indicated parcels are zoned as agricultural, to include dairy operations, what are the associated environmental impacts and issues that warrant mitigation?
- b. What are the environmental impacts, including cumulative impacts, and associated mitigation measures to local wildlife such as the burrowing owl and other sensitive species?
- c. What are the negative effects of artificial lighting from this sports complex on local wildlife and migrating birds?
- d. What are the environmental impacts, including cumulative impacts, and associated mitigation measures to declining vegetation communities to include sensitive species, such as alluvial fan sage scrub?
- e. What are the proposed project's construction and operational emissions and compare those emissions to South Coast AQMD's recommended regional and localized CEQA air quality significance thresholds?
- f. What mitigation measures are warranted due to the increase in traffic flow in terms of a higher risk for safety of drivers and pedestrians as well as delays and backups along the surrounding residential streets?
- g. Ask that a priority be placed constructing infrastructure for public transportation, creating pedestrian-oriented environments, bike paths, which will reduce reliance on the automobile for access to the sports complex.
- h. Establish and use design standards that improve the visual quality of the sports complex development and create unified, distinctive, and attractive mixed-use esthetics.
- i. What are the sports complex operating hours and the impact of these hours on the quality of life for local residents along the routes and traffic corridors?
- j. What are the environmental impacts from noise during construction, amount of light pollution to local residential areas, and stormwater runoff to include protection of the Cucamonga Creek Channel?

Thank you for your time and consideration.

Lois Sicking Dieter  
[LPSicking@cs.com](mailto:LPSicking@cs.com)  
(c/text) (909) 560-2092  
Resident of Upland, CA

EUNICE M. ULLOA  
Mayor

KAREN C. COMSTOCK  
Mayor Pro Tem



CURTIS BURTON  
CHRISTOPHER FLORES  
MARC LUCIO  
Council Members

DR. LINDA REICH  
City Manager

## CITY of CHINO

December 13, 2023

Thomas Grahn  
City of Ontario Planning Department  
303 East "B" Street  
Ontario, CA 91764

Re: Notice of Preparation (NOP) and Scoping Meeting for Ontario Regional Sports Complex Subsequent Environmental Impact Report (SEIR)

Dear Thomas,

This letter is in response to the Notice of Preparation (NOP) and Scoping Meeting for Ontario Regional Sports Complex Subsequent Environmental Impact Report (SEIR), made available on November 14, 2023. The City's comments are outlined below:

### Traffic / Transportation

- 1) The projects Traffic Impact Analysis should include the LOS analysis of any intersections and roadway segments expected to have 50 or more peak hour trips added by the project. The peak hour should not only include the typical morning and afternoon peak periods but an analysis of anticipated event arrival and dismissal peak periods for major events including weekends. A worse-case scenario should be included in the analysis. Impacts to adjacent facilities should be identified and mitigation measures recommended and conditioned upon the project.
- 2) As the project is expected to attract regional use, impacts to regional facilities such as freeways, major arterials and public transportation systems should be included to determine anticipated needs for services and impacts to the transportation system to ensure regional movement of traffic is not significantly impacted.

### Public Works

- 3) The Regional Sports complex seems to be tributary to the Lower Cucamonga Spreading Grounds and Cucamonga Creek. Cucamonga Creek does convey to Mill Creek please describe the changes, if applicable, to any of the constructed wetlands in the Mill Creek wetlands.



- 4) Please specify any deviations from the Regional Board letter dated 11/14/2016 to the design capture volume of the regional natural treatment system wetlands BMP to which this was a part of the development known as New Model Colony to which captured and treated areas by the Mill Creek Wetlands were roughly allocated by land use type.

**Noise**

- 5) The EIR should include an analysis on what mitigation measures would be put in place to mitigate noise impacts from the proposed baseball stadium or other parts of the complex that could be used for other events such as concerts, festivals, monster truck events, etc.

If you have any questions, please contact me by email at [mhitz@cityofchino.org](mailto:mhitz@cityofchino.org), or you can call me at 909-334-3448.

Sincerely,



Chris Cortez  
Assistant Planner

cc: Andrea Gilbert, Acting City Planner  
Dennis Ralls, Transportation Manager

Mr. Thomas Grahn, Senior Planner  
City of Ontario  
303 East B Street  
Ontario, CA 91764

13 December 2023

Re: Proposed EIR-Ontario Regional Sports Complex

Mr. Grahn,

The following is a short list of subjects I would like to see thoroughly discussed and resolved during the preparation of the EIR.

1. TRAFFIC: What is the complete plan for speedy traffic into and out of the Stadium during baseball games and other significant activities held at the Complex?
2. STREET IMPROVEMENTS: What is the plan for major improvements to the adjacent streets to accommodate the increased traffic?
3. UNION CONTRACTORS: Will you make an effort to bring local labor unions in to consult about the planned construction and include a PLA to insure quality workmanship?
4. SOLAR PANELS: Will you commit to the use of Solar panels and batteries to the greatest extent possible for Stadium electrical power?
5. COMMUNITY INPUT: Please provide more education and opportunity for citizen participation not just the minimum.

Sincerely,

Raymond Smith  
3937 San Lorenzo River Road  
Ontario 91761  
rfs702@verizon.net



City of Ontario  
City Hall, Planning Department  
Attn: Mr. Thomas  
Grahm TGrahm@ontarioca.gov  
303 East "B" Street  
Ontario, CA 91764

December 14, 2023

Dear Mr. Grahm:

I have reviewed the Notice of Preparation (NOP) for the Ontario Regional Sports Complex, dated November 14, 2023. Please see the comments below regarding my concerns that need to be addressed for this proposed project.

I agree with the NOP list of the following project issues: Aesthetics, Agriculture and Forestry Resources, Air Quality, Biological Resources, Cultural Resources, Cumulative Effects, Drainage/Absorption, Economics/Jobs, Energy, Flood Plain/Flooding, Geology/Soils, Greenhouse Gas Emissions, Growth Inducement, Hazards & Hazardous Materials, Hydrology/Water Quality, Land Use/Planning, Mandatory Findings of Significance, Mineral Resources, Noise, Population/Housing, Public Services, Recreation, Schools/Universities, Septic System, Sewer Capacity, Solid Waste, Transportation, Tribal Cultural Resources, Utilities/Service Systems, Vegetation, Wetland/Riparian, and Wildfire.

As a resident living close to this proposed project, the issues of the highest priority to my family and neighborhood are:

- a. Transportation, specifically an increase in traffic for an already busy residential area. This includes Air Quality and Greenhouse Gas Emissions. What will the city do to keep trucks off streets where they are not permitted?
- b. This land has been used for many years as dairy farms and currently has manure/effluent pits. What is the specific process to clean and dispose of manure in order to provide for safe drinking water, no contamination to the water table, and make the land safe for use as a sports park? Is the manure considered a hazardous waste?
- c. What are the proposed project environmental impacts, including direct, indirect, and cumulative impacts to residents, plants and wildlife?
- d. Due to the increase in traffic during construction and when the project is completed, what public safety measures will be in place to protect the safety of drivers, pedestrians and bicyclists?
- e. What are the hours this sports park will be open and the sports field lights on (noise and light pollution)? Will the lights be on a shut off timer and it be fenced in to prevent use after hours?

Thank you for your time and consideration.

Tina Silva  
Volunteer for Truck Safety Coalition  
[Tsilva6766@msn.com](mailto:Tsilva6766@msn.com)  
1321 S. Dahlia Ave.  
Ontario, CA 91762

December 15, 2023

SENT VIA EMAIL

RETURN RECEIPT REQUESTED VIA EMAIL

City of Ontario  
City Hall, Planning Department  
Attn: Mr. Thomas Grahn  
TGrahn@ontarioca.gov  
303 East "B" Street  
Ontario, CA 91764

RE: NOP Ontario Regional Sports Complex EIR

Dear Mr. Grahn:

I have reviewed the City of Ontario's Notice of Preparation (NOP) for the Ontario Regional Sports Complex, dated November 14, 2023. By this letter, I'm providing my comments below, and want the EIR for this proposed project to address my concerns.

I agree with the City's NOP list of the following project issues:

Aesthetics, Agriculture and Forestry Resources, Air Quality, Biological Resources, Cultural Resources, Cumulative Effects, Drainage/Absorption, Economics/Jobs, Energy, Flood Plain/Flooding, Geology/Soils, Greenhouse Gas Emissions, Growth Inducement, Hazards & Hazardous Materials, Hydrology/Water Quality, Land Use/Planning, Mandatory Findings of Significance, Mineral Resources, Noise, Population/Housing, Public Services, Recreation, Schools/Universities, Septic System, Sewer Capacity, Solid Waste, Transportation, Tribal Cultural Resources, Utilities/Service Systems, Vegetation, Wetland/Riparian, and Wildfire.

As a resident affected by this proposed project, the issues of the highest priority to my family are:

1. Transportation, specifically an increase in traffic for an already busy residential area. This includes Air Quality and Greenhouse Gas Emissions.
2. This land has been used for many years as dairy farms and currently has manure/effluent pits. What is the specific process to clean and dispose of manure to provide safe drinking water, no contamination to the water table, and make the land safe for use as a sports park? Is the manure considered a hazardous waste?
3. What are the proposed project environmental impacts, including direct, indirect, and cumulative impacts on residents, plants, and wildlife?
4. Due to the increase in traffic during construction and when the project is completed, what public safety measures will be in place to protect the safety of drivers, pedestrians and bicyclists?
5. What are the hours this sports park will be open and the sports field lights on (noise and light pollution)? Will the lights be on a shutoff timer and fenced in to prevent use after hours?
6. Cultural and historical. These lands were occupied by indigenous peoples for thousands of years prior to the City of Ontario's existence. What is being done to protect the historic record and honor those people? Since the dairy industry has played a significant role in the history of Ontario and its economy, how will that be preserved and respected?

7. This project will require increased amounts of signage for directing traffic and advertising the amenities/businesses within. Signage size, type, and amount can become excessive and should be significantly restricted to accommodate the aesthetics of the community.
8. What is the expected carbon footprint of construction and on-going operation? This should be lowered beyond today's standards since the project will be long-lasting. Alternative energy sources should be considered?
9. Economically, if this project reaches the construction phase, it should be built with 100% union labor. The hotel and other businesses or contracted services should have a unionized workforce. All effort should be made to prioritize hiring from Ontario so that 90% of the workforce lives in the city. There must be a commitment to fostering diversity and promoting minority, women, Veteran, and small business through this project by providing supportive efforts that help them bid for construction, operation, and maintenance with a minimum of 90% of awards going to them. Large contractors/operators must be required to use 75% minority, women, veteran, small Ontario businesses to win contracts/bids.
10. With high winds and flash flooding regular occurrences in Ontario, what is the plan to mitigate and protect the project and surrounding community/neighborhoods?
11. From a fiscal aspect, how will this proposed project compare to using the same funds to generate equivalent amenities throughout Ontario rather than concentrating them in this one area that is difficult to access by 70% of residents? What are the operational costs for the city?
12. Water supply. What is being done to use reclaimed water for irrigation? How much additional water will be needed to support this project in both construction and on-going operations? Where will that water come from and how will it be sustained over time given the increased housing construction and warehousing in the city? How will sewer systems be impacted?
13. What is the impact on utilities and service systems? How will the increased demand generated by this project be addressed so that it will not impact residents? Will power and communication systems be trenched? If trenched, how far will this impact streets and other rights of way beyond the footprint of this project?
14. Will residents be given priority for use of this "Regional" project? What are the estimates of resident/non-resident usage? How much of the resulting project will be open to the public, free of charge and how much will be pay-for-use? Will a police substation be included? Will a fire station or paramedic center be included?
15. What kind of retail/shopping will be allowed? What will their hours of operation be? What type of hotel and its hours of operation?

Respectfully submitted,

Chris Robles  
Chris@FairOntario.com  
1945 E. Harvard Privado #C  
Ontario, CA 91764



## CITY OF RANCHO CUCAMONGA

10500 Civic Center | Rancho Cucamonga, CA 91730 | 1-909-477-2700 | [www.CityofRC.us](http://www.CityofRC.us)

Via Electronic Mail

December 15, 2023

Thomas Grahn  
Senior Planner  
City of Ontario  
303 East "B" Street  
Ontario, CA 91764

Re: Comments on Notice of Preparation for the Ontario Regional Sports Complex Subsequent EIR

Dear Mr. Grahn:

I am writing to comment on the updated Notice of Preparation (NOP) for the proposed Ontario Regional Sports Complex Subsequent EIR. The City of Rancho Cucamonga appreciates the opportunity to participate in the scoping process for this significant project, which seeks to develop a new minor league baseball stadium and sports complex in Ontario Ranch. In response to the initial release of the NOP, the City of Rancho Cucamonga provided comments on October 16, 2023. We have reviewed the updated NOP, and thank you for updating the project description. It has been expanded to include new details, including a map showing which parcels are proposed to be utilized for SB330 and SB166 compliance. However, the project description and updated NOP only address some of our comments.

Our previous letter also addressed statements from several City of Ontario officials expressing the City's desire to create a new home for the Rancho Baseball, LLC., franchise, which currently plays its home games at LoanMart Field (the Epicenter) in the City of Rancho Cucamonga, with the stated intent of relocating the team from Rancho Cucamonga to this new facility in the City of Ontario. If this is indeed Ontario's intended course of action, the City of Rancho Cucamonga asked that it be disclosed in the revised NOP as part of the project description. The revised NOP includes information about the proposed development of a Regional Sports Complex with a semiprofessional baseball stadium. However, no clarification is provided on the statements made by several City of Ontario officials expressing the City's desire to create a new home for the Rancho Baseball, LLC. franchise. Since no clarification is provided on this issue, we assume the City of Ontario will work to establish a second minor league baseball team in the area. Alternatively, if the City of Ontario intends to create a new home for the Rancho Baseball, LLC. franchise, the environmental impacts of moving this *local and regional* draw from one city to another should be disclosed in the Subsequent EIR, including impacts to the City of Rancho Cucamonga. Otherwise, if Ontario's intent is to establish a new team to play at the stadium, then that should likewise be disclosed in the Subsequent EIR. Without fully understanding the intent to relocate the Rancho Baseball, LLC., franchise, it is difficult to fully comment on the necessary considerations and analysis for the Subsequent EIR.

While we acknowledge and appreciate that some changes were made to the NOP, we still request that the Subsequent EIR address each of the comments made in our October 16, 2023 letter. A copy of that letter is attached for your reference. In conclusion, we emphasize the importance of a comprehensive and transparent environmental review process for the proposed Ontario Regional Sports Complex. We are excited about the potential benefits for the region such a facility might provide. Please consider all of our comments during the development of the EIR, and feel free to contact me if you require any additional information or clarification. We

appreciate the City of Ontario sharing the NOP with the City of Rancho Cucamonga and request that you continue to notify the City of Rancho Cucamonga of all future steps and opportunities to participate in the environmental review process.

Sincerely,



Matt Marquez  
Director of Planning and Economic Development  
City of Rancho Cucamonga

Attachments (1)

- 1) October 16, 2023 Letter from the City of Rancho Cucamonga

**From:** [Thomas Grahn](#)  
**To:** [Nicole Vermilion](#); [Lexie Zimny](#)  
**Cc:** [Kimberly Ruddins](#)  
**Subject:** FW: Ontario Sports Complex comment  
**Date:** Friday, December 15, 2023 3:12:18 PM

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**From:** Estela Ballon <egballon2@gmail.com>  
**Sent:** Friday, December 15, 2023 12:59 PM  
**To:** Thomas Grahn <TGrahn@ontarioca.gov>  
**Subject:** Ontario Sports Complex comment

December 15, 2023

City of Ontario  
City Hall, Planning Department  
Attn: Mr. Thomas Grahn  
[TGrahn@ontarioca.gov](mailto:TGrahn@ontarioca.gov)  
303 East "B" Street  
Ontario, CA 91764

Dear Mr. Grahn:

I have reviewed the Notice of Preparation (NOP) for the Ontario Regional Sports Complex, dated November 14, 2023. I oppose this project at this time primarily because the residents in the area have not been notified in a meaningful and targeted way, that I know of. This is a project which according to city advertisements will bring 1.2 million people to this area. Residents in a 2 mile radius should be targeted with information about this project because it will impact the area in a significant way. I am a college-educated, English dominant resident of 20 years, and I was not even aware of the city newsletter that is considered one form of notifying residents of projects. I fear that other residents don't have access to notices about the project. Please see the comments below regarding my concerns that need to be addressed for this proposed project.

I agree with the NOP list of the following project issues: Aesthetics, Agriculture and Forestry Resources, Air Quality, Biological Resources, Cultural Resources, Cumulative Effects, Drainage/Absorption, Economics/Jobs, Energy, Flood Plain/Flooding, Geology/Soils, Greenhouse Gas Emissions, Growth Inducement, Hazards & Hazardous Materials, Hydrology/Water Quality, Land Use/Planning, Mandatory Findings of Significance, Mineral Resources, Noise, Population/Housing, Public Services, Recreation, Schools/Universities, Septic System, Sewer Capacity, Solid Waste, Transportation, Tribal Cultural Resources, Utilities/Service Systems, Vegetation, Wetland/Riparian, and Wildfire.

As a longtime resident living close to this proposed project, the issues of the highest priority to my family are:

- a. Transportation, specifically an increase in traffic for an already busy residential area. This area already has a lot of semi-trucks traffic as well. This includes Air Quality and Greenhouse Gas Emissions. All of the 60 freeway exits from Grove to Haven including

Vineyard and Archibald) may be impacted as well Riverside Dr. itself. There are many houses and a mobile home park (at Vineyard) along Riverside Drive that will be impacted.

- b. This land has been used for many years as dairy farms and currently has manure/effluent pits. What is the specific process to clean and dispose of manure in order to provide for safe drinking water, no contamination to the water table, and make the land safe for use as a sports park? Is the manure considered a hazardous waste?
- c. What are the proposed project environmental impacts, including direct, indirect, and cumulative impacts on residents, plants, and wildlife?
- d. What are the hours this sports park will be open and the sports field lights on (noise and light pollution)? Will the lights be on a shutoff timer and fenced in to prevent use after hours?

Again, in addition to the environmental concerns noted above, I would like for the residents in a 2 mile radius to be informed of this large project in an effective and thorough way so that they can comment on it. Thank you for your time and consideration.

***Estela G. Ballón***

Estela G. Ballon  
[egballon2@gmail.com](mailto:egballon2@gmail.com)  
2854 S Hope Ave  
Ontario CA 91761

**From:** [Thomas Grahn](#)  
**To:** [Nicole Vermilion](#); [Lexie Zimny](#)  
**Cc:** [Kimberly Ruddins](#)  
**Subject:** FW: Notice of Preparation (NOP) for the Ontario Regional Sports Complex, dated November 14, 2023.  
**Date:** Friday, December 15, 2023 11:56:24 AM

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**From:** ESQ ESQ <esqprecious@yahoo.com>  
**Sent:** Friday, December 15, 2023 10:48 AM  
**To:** Thomas Grahn <TGrahn@ontarioca.gov>  
**Subject:** Notice of Preparation (NOP) for the Ontario Regional Sports Complex, dated November 14, 2023.

City Hall, Planning Department  
Attn: Mr. Thomas Grahn  
Page  
December 15, 2023  
City of Ontario  
City Hall, Planning Department  
Attn: Mr. Thomas Grahn  
[TGrahn@ontarioca.gov](mailto:TGrahn@ontarioca.gov)  
303 East "B" Street  
Ontario, CA 91764

Dear Mr. Grahn:

I have reviewed the Notice of Preparation (NOP) for the Ontario Regional Sports Complex, dated November 14, 2023. Please see the comments below regarding my concerns that need to be addressed for this proposed project.

I agree with the NOP list of the following project issues: Aesthetics, Agriculture and Forestry Resources, Air Quality, Biological Resources, Cultural Resources, Cumulative Effects, Drainage/Absorption, Economics/Jobs, Energy, Flood Plain/Flooding, Geology/Soils, Greenhouse Gas Emissions, Growth Inducement, Hazards & Hazardous Materials, Hydrology/Water Quality, Land Use/Planning, Mandatory Findings of Significance, Mineral Resources, Noise, Population/Housing, Public Services, Recreation, Schools/Universities, Septic System, Sewer Capacity, Solid Waste, Transportation, Tribal Cultural Resources, Utilities/Service Systems, Vegetation, Wetland/Riparian, and Wildfire.

As a resident living close to this proposed project, the issues of the highest priority to my family are:

1. Transportation, specifically an increase in traffic for an already busy residential area. This includes Air Quality and Greenhouse Gas Emissions.
2. This land has been used for many years as dairy farms and currently has manure/affluent pits. What is the specific process to clean and dispose of manure in order to provide for safe drinking water, no contamination to the water table, and make the land safe for use as a sports park? Is the manure considered a hazardous waste?
3. What are the proposed project environmental impacts, including direct,



indirect, and cumulative impacts on residents, plants, and wildlife?

4. Due to the increase in traffic during construction and when the project is completed, what public safety measures will be in place to protect the safety of drivers, pedestrians and bicyclists?
5. What are the hours this sports park will be open and the sports field lights on (noise and light pollution)? Will the lights be on a shutoff timer and fenced in to prevent use after hours?

The ripple effect: historically speaking, sports complexes lead to increased rents including small businesses and increased overall cost of living. A lot of us are already living paycheck to paycheck just to keep up with the rents. Homelessness will increase even more because of greedy landlords. Landlords are at the root of working ppl becoming homeless. Seventy percent of CA are renters....the Roman Empire fell after they built the Colosseum...Ontario already has other sports complexes, do we really need another one?

Thanks.

Esther Schmall  
1221 n vineyard Ave 73  
Ontario ca 91764

December 15, 2023

City of Ontario  
City Hall, Planning Department  
Attn: Mr. Thomas Grahn  
TGrahn@ontarioca.gov  
303 East "B" Street  
Ontario, CA 91764

Dear Mr. Grahn:

I have reviewed the Notice of Preparation (NOP) for the Ontario Regional Sports Complex, dated November 14, 2023. Please see the comments below regarding my concerns that need to be addressed for this proposed project.

I agree with the NOP list of the following project issues: Aesthetics, Agriculture and Forestry Resources, Air Quality, Biological Resources, Cultural Resources, Cumulative Effects, Drainage/Absorption, Economics/Jobs, Energy, Flood Plain/Flooding, Geology/Soils, Greenhouse Gas Emissions, Growth Inducement, Hazards & Hazardous Materials, Hydrology/Water Quality, Land Use/Planning, Mandatory Findings of Significance, Mineral Resources, Noise, Population/Housing, Public Services, Recreation, Schools/Universities, Septic System, Sewer Capacity, Solid Waste, Transportation, Tribal Cultural Resources, Utilities/Service Systems, Vegetation, Wetland/Riparian, and Wildfire.

As a resident living close to this proposed project, my family's primary concerns revolve around:

- a. Transportation, specifically the potential increase in traffic for an already bustling residential area, considering Air Quality and Greenhouse Gas Emissions.
- b. Given that the land has historically been used for dairy farming and currently features manure/effluent pits, I seek clarity on the precise process for cleaning and disposing of manure. This is to ensure the provision of safe drinking water, prevent contamination of the water table, and guarantee the land's safety for use as a sports park. Additionally, I am curious whether the manure is classified as hazardous waste.
- c. What are the proposed project environmental impacts, including direct, indirect, and cumulative impacts on residents, plants, and wildlife?
- d. In light of the expected increase in traffic during both construction and post-completion phases, I am interested in understanding the public safety measures that will be implemented to safeguard drivers, pedestrians, and bicyclists.

e. Finally, I would appreciate information on the operating hours of the sports park and the schedule for sports field lights. Specifically, will there be measures such as a shutoff timer and fencing to mitigate noise and light pollution and prevent unauthorized use after hours?

Thank you for dedicating your time to consider these inquiries.

Sincerely

Calvin Yee and Katie Cheng

[katiekcheng@me.com](mailto:katiekcheng@me.com)

1125 N Solano Privado, #A

Ontario, CA 91764

**From:** [Thomas Grahn](#)  
**To:** [Nicole Vermilion](#); [Lexie Zimny](#)  
**Cc:** [Kimberly Ruddins](#)  
**Subject:** FW: Ontario Regional Sports Complex (File No. PGPA23-002 & PZC23-004)  
**Date:** Friday, December 15, 2023 3:13:22 PM

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**From:** Mina Young <mina.young@gmail.com>  
**Sent:** Friday, December 15, 2023 1:17 PM  
**To:** Thomas Grahn <TGrahn@ontarioca.gov>  
**Subject:** Ontario Regional Sports Complex (File No. PGPA23-002 & PZC23-004)

December 15, 2023

City of Ontario - Planning Department  
Attn: Mr. Thomas Grahn  
303 East "B" Street  
Ontario, CA 91764  
[TGrahn@ontarioca.gov](mailto:TGrahn@ontarioca.gov)

Re: Ontario Regional Sports Complex (File No. PGPA23-002 & PZC23-004)

Hello Mr. Grahn,

I looked at the Notice of Preparation (NOP) for the Ontario Regional Sports Complex (dated 11.14.23) and wanted to express some concerns on the proposed project.

There were multiple project issues listed on the NOP and I live close to the project location. Here are my concerns:

1. Traffic – There will be increased traffic and Riverside Drive is already congested as it narrows down to one lane.
  
2. Environmental Impact - With more vehicles going through residential areas, there will be negative effects to air quality due to greenhouse gas emissions.
  
3. Security/Safety
  - A. Auto - The increase in traffic (during construction and once the complex is open) opens up the potential for an increase in traffic accidents. What safety measures will be put in place to protect drivers, pedestrians, and bicyclists?

B. Residential – With more people coming into the City of Ontario to use the complex, there is the likelihood of more crimes being committed in the residential areas near the complex. It is already a concern as a resident living near Haven Avenue. Are there plans for more Police Officers patrolling the area? What measures will be put in place to ensure the safety of residents and their property?

4. Hazardous Waste - This land housed dairy farms. Will there be measures to ensure that the waste from any leftover manure pits does not contaminate drinking water for residents and the sports complex?

Thank you for your time and consideration.

Regards,

Mina Young  
2806 Oak Creek Dr. Unit B  
Ontario, CA 91761  
[mina.young@gmail.com](mailto:mina.young@gmail.com)

SENT VIA E-MAIL:

December 15, 2023

[tgrahn@ontarioca.gov](mailto:tgrahn@ontarioca.gov)

Thomas Grahn, Senior Planner  
City of Ontario  
Planning Department  
303 East "B" Street  
Ontario, CA 91764

**Notice of Preparation of a Draft Environmental Impact Report for the  
Ontario Regional Sports Complex (Proposed Project)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. Our comments are recommendations on the analysis of potential air quality impacts from the Proposed Project that should be included in the Environmental Impact Report (EIR). Please send a copy of the EIR upon its completion and public release directly to South Coast AQMD as copies of the EIR submitted to the State Clearinghouse are not forwarded. **In addition, please send all appendices and technical documents related to the air quality, health risk, and greenhouse gas analyses (electronic versions of all emission calculation spreadsheets, air quality modeling, and health risk assessment input and output files, not PDF files). Any delays in providing all supporting documentation for our review will require additional review time beyond the end of the comment period.**

**CEQA Air Quality Analysis**

Staff recommends that the Lead Agency use South Coast AQMD's CEQA Air Quality Handbook and website<sup>1</sup> as guidance when preparing the air quality and greenhouse gas analyses. It is also recommended that the Lead Agency use the CalEEMod<sup>2</sup> land use emissions software, which can estimate pollutant emissions from typical land use development and is the only software model maintained by the California Air Pollution Control Officers Association.

South Coast AQMD has developed both regional and localized significance thresholds. South Coast AQMD staff recommends that the Lead Agency quantify criteria pollutant emissions and compare the emissions to South Coast AQMD's CEQA regional pollutant emissions significance thresholds<sup>3</sup> and localized significance thresholds (LSTs)<sup>4</sup> to determine the Proposed Project's air quality impacts. The localized analysis can be conducted by either using the LST screening tables or performing dispersion modeling.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of

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<sup>1</sup> South Coast AQMD's CEQA Handbook and other resources for preparing air quality analyses can be found at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>.

<sup>2</sup> CalEEMod is available free of charge at: [www.caleemod.com](http://www.caleemod.com).

<sup>3</sup> South Coast AQMD's CEQA regional pollutant emissions significance thresholds can be found at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>.

<sup>4</sup> South Coast AQMD's guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips, and hauling trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers and air pollution control devices), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, emissions from the overlapping construction and operational activities should be combined and compared to South Coast AQMD's regional air quality CEQA *operational* thresholds to determine the level of significance.

In the event that implementation of the Proposed Project requires a permit from South Coast AQMD, South Coast AQMD should be identified as a Responsible Agency for the Proposed Project in the EIR. The assumptions in the air quality analysis in the EIR will be the basis for evaluating the permit under CEQA and imposing permit conditions and limits. Questions on permits should be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

The California Air Resources Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective*<sup>5</sup> is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process with additional guidance on strategies to reduce air pollution exposure near high-volume roadways available in CARB's technical advisory<sup>6</sup>.

The South Coast AQMD's *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*<sup>7</sup> includes suggested policies that local governments can use in their General Plans or through local planning to prevent or reduce potential air pollution impacts and protect public health. It is recommended that the Lead Agency review this Guidance Document as a tool when making local planning and land use decisions.

### **Mitigation Measures**

In the event that the Proposed Project results in significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize these impacts. Any impacts resulting from mitigation measures must also be analyzed. Several resources to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project include South Coast AQMD's CEQA Air Quality Handbook,<sup>8</sup> South Coast AQMD's Mitigation Monitoring and Reporting Plan for the 2022 Air Quality Management Plan,<sup>9</sup> and Southern California Association of Government's Mitigation Monitoring and Reporting Plan for the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy.<sup>10</sup>

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

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<sup>5</sup> CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* can be found at:

<http://www.arb.ca.gov/ch/handbook.pdf>.

<sup>6</sup> CARB's technical advisory can be found at: <https://www.arb.ca.gov/ch/landuse.htm>.

<sup>7</sup> South Coast AQMD. 2005. *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*. Available at: <http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf>.

<sup>8</sup> <https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>

<sup>9</sup> South Coast AQMD's 2022 Air Quality Management Plan can be found at: <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan> (Chapter 4 - Control Strategy and Implementation).

<sup>10</sup> Southern California Association of Governments' 2020-2045 RTP/SCS can be found at:

[https://www.connectsocial.org/Documents/PEIR/certified/Exhibit-A\\_ConnectSoCal\\_PEIR.pdf](https://www.connectsocial.org/Documents/PEIR/certified/Exhibit-A_ConnectSoCal_PEIR.pdf).

- Maximize 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.

Design considerations for the Proposed Project that the Lead Agency should consider 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, day care 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 there are no trucks 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.

South Coast AQMD staff is available to work with the Lead Agency to ensure that air quality, greenhouse gas, and health risk impacts from the Proposed Project are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at [swang1@aqmd.gov](mailto:swang1@aqmd.gov).

Sincerely,

*Sam Wang*

Sam Wang

Program Supervisor, CEQA IGR

Planning, Rule Development & Implementation

SW  
SBC231122-15  
Control Number