City of Fontana
Planning Division
8353 Sierra Avenue
Fontana, CA 92335

Notice of Preparation of a Draft EIR and Scoping Meeting

Date: March 13, 2019

To: Public Agencies and Interested Parties

Subject: Notice of Preparation of a Draft Environmental Impact Report and Scoping Meeting

Project Title: Goodman Logistics Center Fontana III

The City of Fontana, as lead agency under the California Environmental Quality Act (CEQA), will prepare an Environmental Impact Report (EIR) for the Goodman Logistics Center Fontana III project. In accordance with Section 15082 of the CEQA Guidelines, the City has issued this Notice of Preparation (NOP) to provide responsible agencies, trustee agencies, and other interested parties with information describing the proposed project and its potential environmental effects.

The purpose of this notice is to:

1) serve as the Notice of Preparation of an Environmental Impact Report for the Office of Planning and Research (OPR), Responsible Agencies, public agencies involved in funding or approving the project, and Trustee Agencies responsible for natural resources affected by the project, pursuant to CEQA Guidelines Section 15082;

2) advise and solicit comments and suggestions regarding the preparation of the EIR, environmental issues to be addressed in the EIR, and any other related issues, from interested parties, including interested or affected members of the public; and

3) advertise a public meeting to solicit comments from public agencies and interested parties regarding the scope of study in the EIR.

Project Location

The proposed Goodman Logistics Center Fontana III project (herein "Project") is located on approximately 47.5 acres in the southern portion of the City of Fontana, San Bernardino County, California (see Figure 1, Regional Map). The Project site is located south of Santa Ana Avenue, north of Jurupa Avenue, east of Cypress Avenue, and west of Juniper Avenue (see Figure 2, Vicinity Map).

Project Description

The Project entails several discretionary approvals that would provide for the development of a three-building industrial park containing 1,118,460 s.f. of building floor area. The specific discretionary actions associated with the proposed Project are summarized below.

General Plan Amendment No. 19-01 would amend the City of Fontana's General Plan Land Use Map to change the land use designation for all parcels within the Project site from "Residential Planned Community (R-PC)" to "General Industrial (I-G)." See Figure 3.

Specific Plan Amendment No. 19-02 would amend the Southwest Industrial Park (SWIP) Specific Plan Land Use Plan to expand the SWIP boundary to include the Project site. The Project site would be incorporated into the SWIP Specific Plan's Slover East Industrial District (SED). See Figure 4.

Zone Change No. 19-01 would amend the City of Fontana Zoning District Map to change the zoning designation for all parcels within the Project site from "Residential Planned Community (R-PC)" to "Specific Plan (Southwest Industrial Park)."

Design Review No. 19-05 includes a specific development plan, including a physical site layout, architectural design, and landscaping plan, for a three-building logistics center park (herein, "Building 3," "Building 4," and "Building 5") offering warehousing distribution and supporting office space. The proposed logistics center would be developed in two phases and would, ultimately, include 1,118,460 square feet (s.f.) of total floor area. Building 3 would be constructed with 453,020 s.f. of floor area, Building 4 would be constructed with 363,380 s.f. of floor area in the first phase and would be expanded by 89,640 s.f. in the second phase (for a total floor area of 453,020 s.f.), and Building 5 would be constructed with 212,420 s.f. of floor area. See Figure 5. Buildings 3, 4, and 5 are assumed to operate 24 hours a day, 7 days per week.

Tentative Parcel Map No. 19-02 would consolidate all parcels on the Project site located east of Cypress Avenue, with the exception of APN 0255-091-23, to create three parcels: an approximately 18.8-acre (net) parcel for Building 3, an approximately 17.8-acre (net) parcel for Building 4, and an approximately 9.9-acre (net) parcel for Building 5. A **Parcel Merger** would later be required to merge APN 0255-091-23 with the parcel created for Building 4. After the parcel merger, the parcel for Building 4 would have an area of approximately 18.8 acres (net).

The Project Applicant and the City of Fontana are contemplating entering into a **Development Agreement** related to the proposed Project pursuant to California Government Code §§ 65864-65869.5. The EIR will evaluate the reasonably foreseeable environmental impacts, if any, associated with implementation of the Development Agreement.

A **Comprehensive Sign Program** has been submitted by the Project Applicant pursuant to the provisions established in the SWIP Specific Plan.

EIR Scope

In instances where an EIR is clearly required for a project, CEQA Guidelines Section 15063 grants Lead Agencies the ability to bypass preparation of an Initial Study and proceed with preparation of an EIR. In this instance, the City of Fontana has determined that the Project clearly has the potential to result in significant environmental effects and that an EIR shall be prepared that addresses the following environmental considerations:

- 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
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

The EIR will assess the effects of the Project on the environment, identify potentially significant impacts, identify feasible mitigation measures to reduce or eliminate potentially significant environmental impacts, and discuss potentially feasible alternatives to the Project that may accomplish basic objectives while lessening or eliminating any potentially significant Project-related impacts. The EIR will be prepared on behalf of and under the supervision of the City of Fontana by the consulting firm T&B Planning, Inc. located at 17542 East 17th Street, Suite 100, Tustin, CA 92780.

Opportunity for Public Review and Comment

This Notice is available for review on the City's website at: https://www.fontana.org/2137/Environmental-Documents.

Additionally, the NOP also is available for review at the below locations. Please contact locations to confirm hours.

City of Fontana
Planning Division
8533 Sierra Avenue
Fontana, CA 92335
(909) 350-6718

MON-THURS: 8 AM – 6 PM

Fontana Lewis Library
8437 Sierra Avenue
Fontana, CA 92335
(909) 574-4500

SAT: 10 AM – 6 PM
SUN: Noon – 5 PM
MON – THURS: 10 AM – 9PM

The City of Fontana would like to receive your input on the scope of the information and analysis to be included in the EIR. Due to time limits, as established by CEQA, your response should be sent at the earliest possible date, but no later than thirty (30) days after publication of this notice. Please submit your comments by 5:00 p.m. on April 11, 2019 by mail or e-mail to:

Dawn Rowe
City of Fontana
8353 Sierra Avenue
Fontana, CA 92335

Phone: (909) 350-6694
Fax: (909) 350-7676
Email: drowe@fontana.org

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

Scoping Meeting

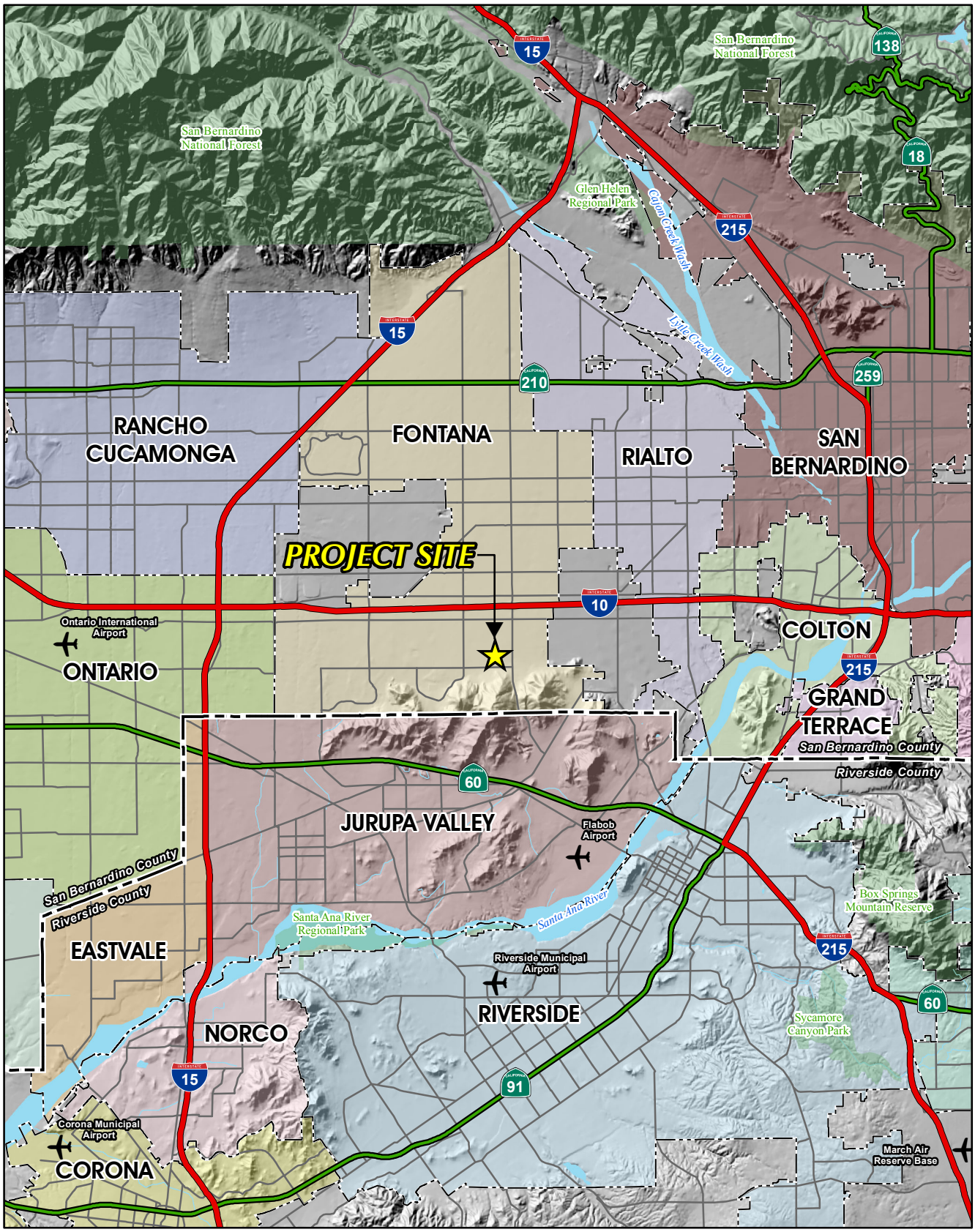
Pursuant to Section 21083.9(a)(2) of the CEQA Statute and CEQA Guidelines Section 15082(c), the City of Fontana will hold a public scoping meeting, where agencies, organizations, and members of the public will receive a brief presentation on the project and will have the opportunity to provide comments on the scope of the information and analysis to be included in the EIR.

The meeting will be held on:

Date and Time: April 3, 2019 at 5:00 p.m.

Place: City of Fontana
Development Services Office Building
8353 Sierra Avenue
(909) 350-6694

Attachments:
Figure 1 – Regional Map
Figure 2 – Vicinity Map
Figure 3 – General Plan Amendment No. 19-01
Figure 4 – Specific Plan Amendment No. 19-02
Figure 5 – Design Review No. 19-05



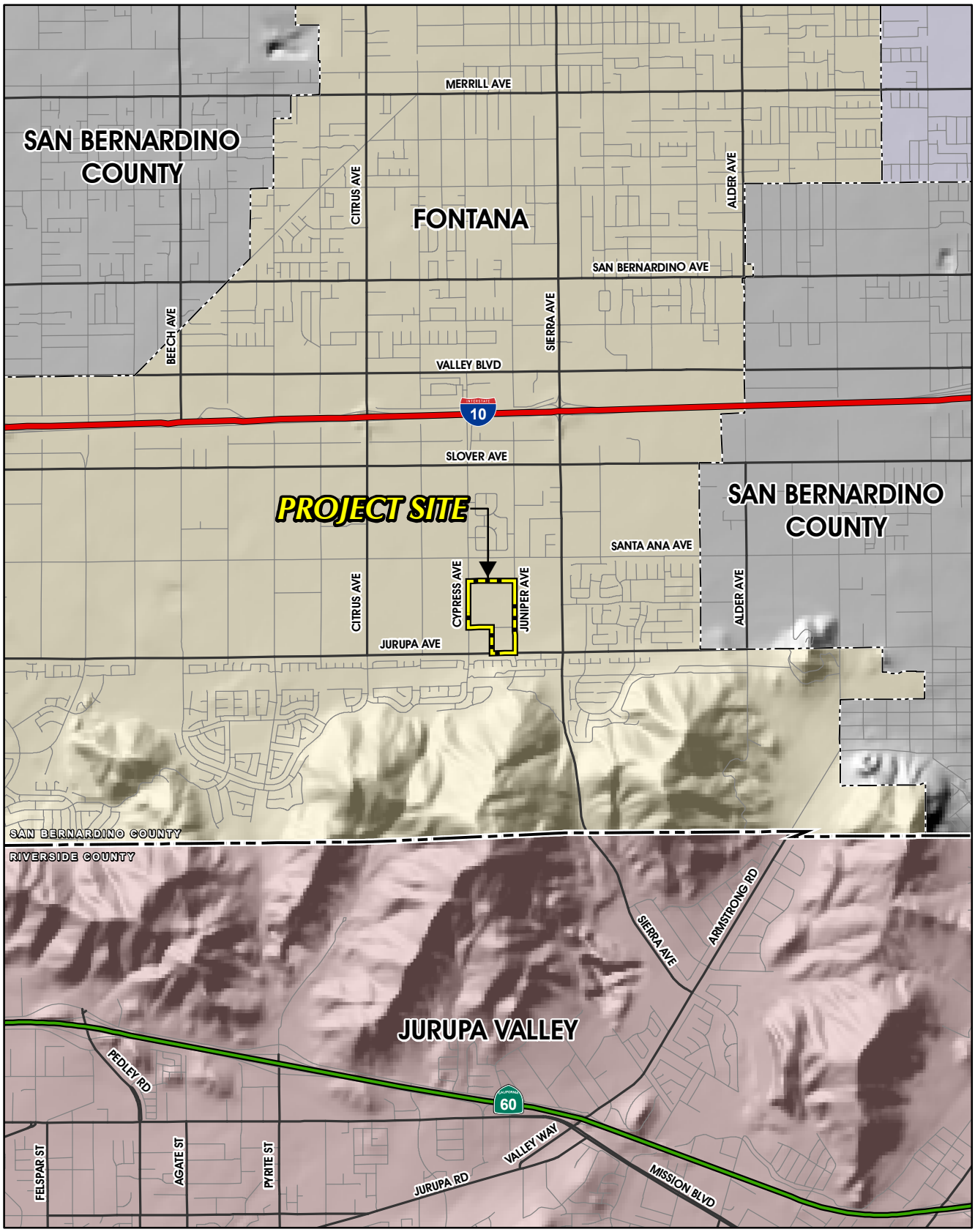
Source(s): ESRI, RCTLMA (2018), SBCTA (2018)

0 0.75 1.5 3 Miles

Figure 1

REGIONAL MAP

Project Name: Goodman Logistics Center Fontana III



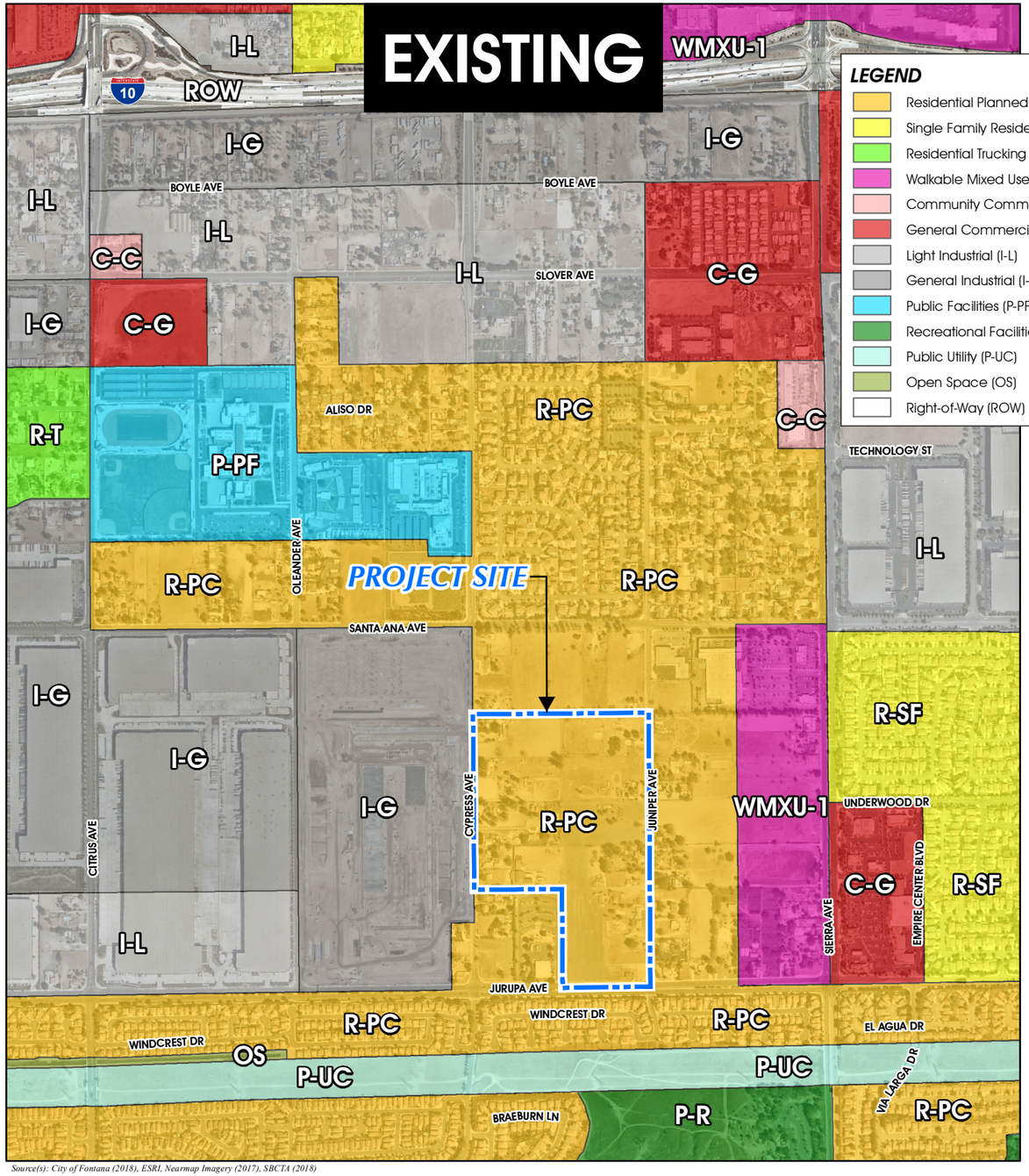
Source(s): ESRI, RCTLMA (2018), SBCTA (2018)

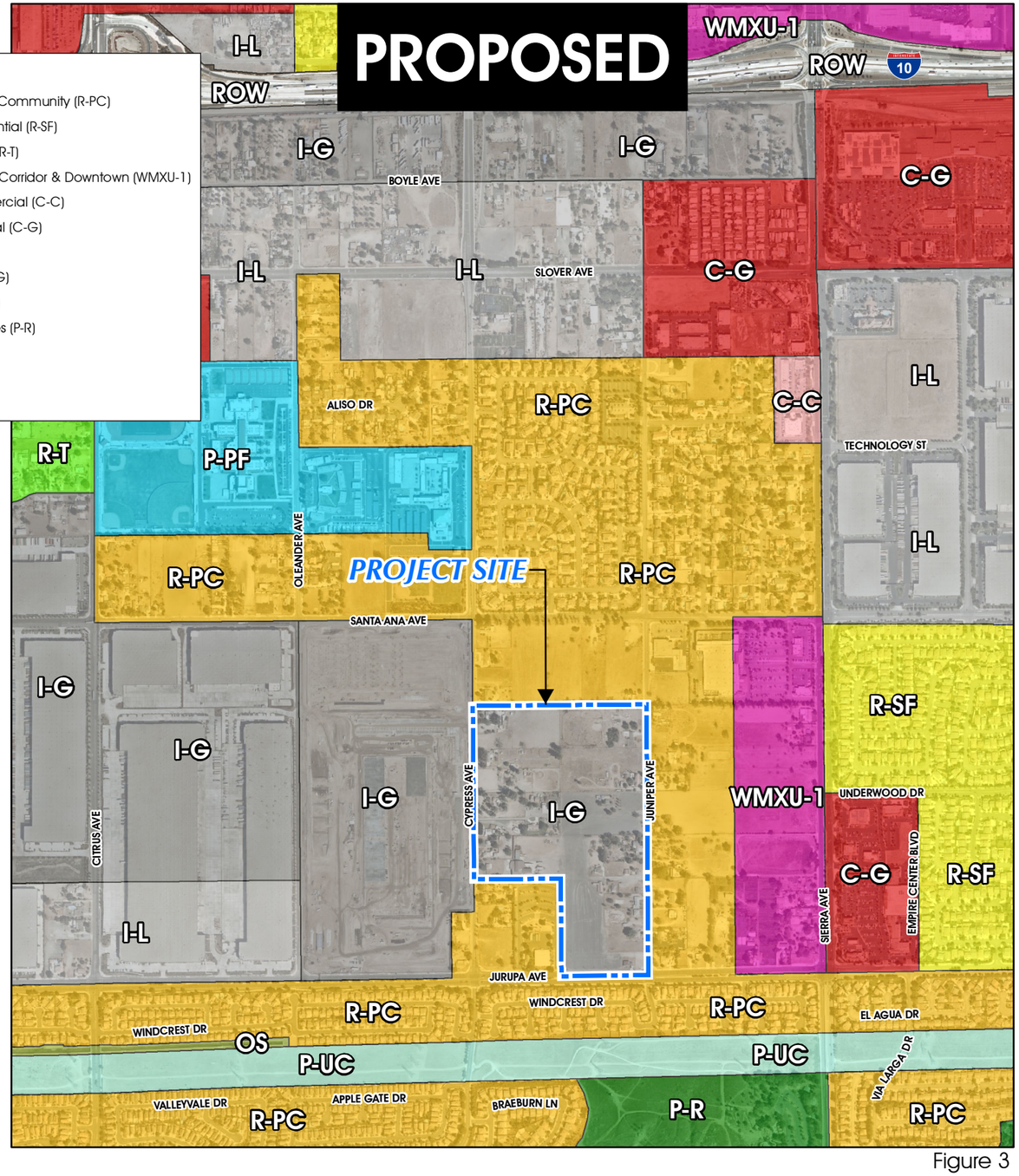
0 1,000 2,000 4,000 Feet

Figure 2

VICINITY MAP

Project Name: Goodman Logistics Center Fontana III



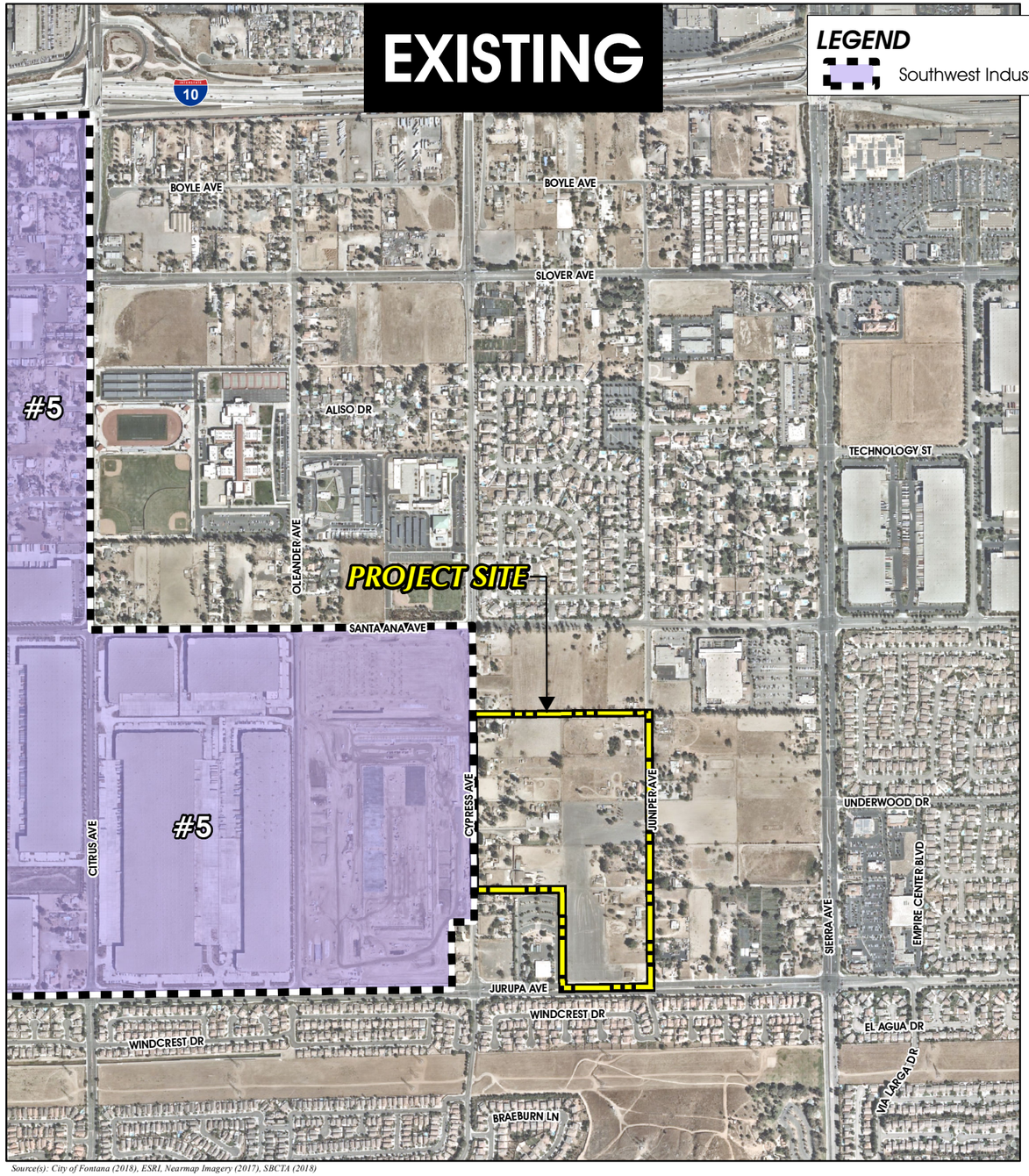


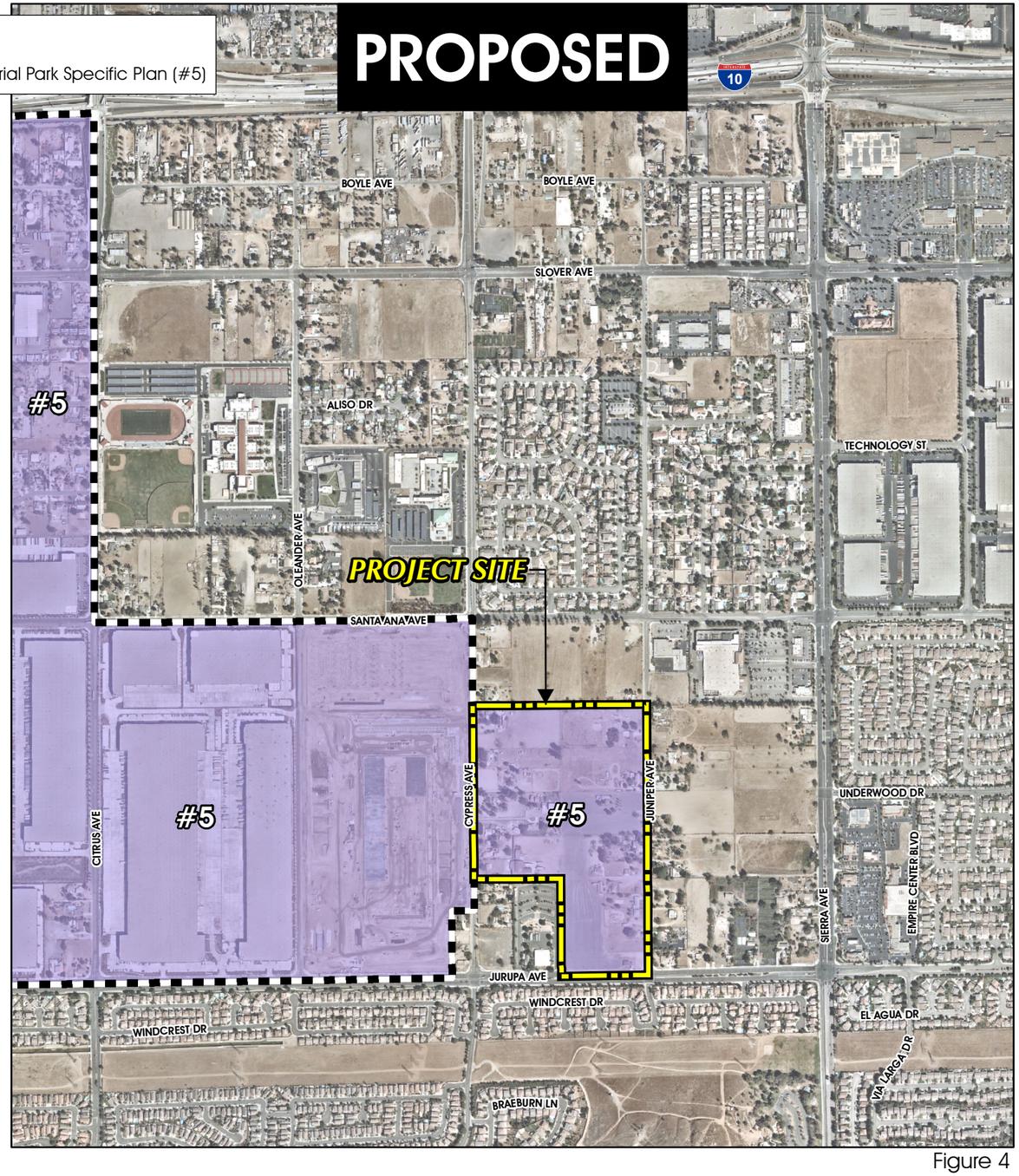
Source(s): City of Fontana (2018), ESRI, Nearmap Imagery (2017), SBCTA (2018)

Figure 3

GENERAL PLAN AMENDMENT NO. 19-01

Project Name: Goodman Logistics Center Fontana III





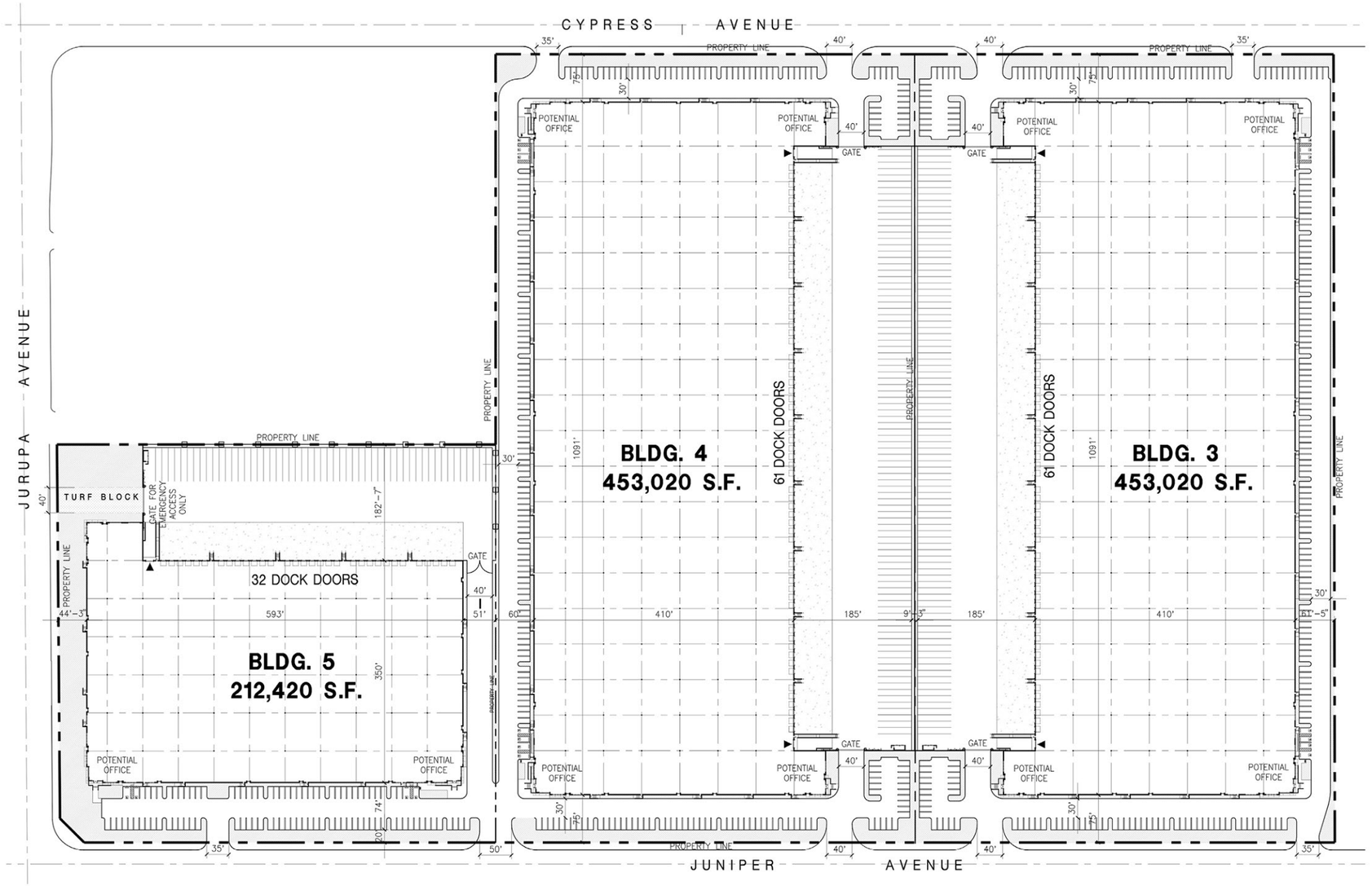
Source(s): City of Fontana (2018), ESRI, Nearmap Imagery (2017), SBCTA (2018)

0 250 500 1,000 Feet

Figure 4

SPECIFIC PLAN AMENDMENT NO. 19-02

Project Name: Goodman Logistics Center Fontana III



PROPERTY OWNER

GLC FONTANA III LLC
18201 VON KARMAN AVE., STE. 1170
IRVINE, CA 92612
TEL. NO.: (949) 407-0142
CONTACT: WARD MACE

APPLICANT'S REPRESENTATIVE

MIG
1500 IOWA AVE, STE #100
RIVERSIDE CA 92507
TEL. NO.: (951) 787-9222
CONTACT: ALEX STEELE

ADDRESS OF THE PROPERTY

NORTH OF JURUPA AVENUE BETWEEN JUNIPER AVENUE AND CYPRESS AVENUE

ASSESSOR'S PARCEL NUMBER

0255-091-09	0255-091-21	0255-091-26	0255-091-41	0255-091-54	0255-091-62
0255-091-12	0255-091-22	0255-091-27	0255-091-46	0255-091-55	
0255-091-13	0255-091-23	0255-091-29	0255-091-47	0255-091-56	
0255-091-14	0255-091-24	0255-091-32	0255-091-48	0255-091-57	
0255-091-15	0255-091-25	0255-091-33	0255-091-49	0255-091-61	

ZONING

ZONING
ZONE DESIGNATION: SWIP (SOUTHWEST INDUSTRIAL PARK)
ZONING DISTRICT: SED (SLOVER EAST INDUSTRIAL DISTRICT)
JND (JURUPA NORTH RESEARCH AND DEVELOPMENT DISTRICT)

APPLICANT

GLC FONTANA III LLC
18201 VON KARMAN AVE., STE. 1170
IRVINE, CA 92612
TEL. NO.: (949) 407-0142
CONTACT: WARD MACE

ARCHITECT

HPA INC.
18831 BARDEEN AVE, STE#100
IRVINE, CA 92612
TEL. NO.: (949) 862-2112
CONTACT: INKON KIM

PROJECT DATA

	BLDG. 3	BLDG. 4	BLDG. 5	TOTAL	
SITE AREA					
in s.f.	819,568	819,294	430,450	2,069,312	sf
in acres	18.81	18.81	9.88	47.50	ac
BUILDING AREA					
Office	10,000	10,000	6,000	26,000	sf
Warehouse	443,020	443,020	206,420	1,092,460	sf
TOTAL	**453,020**	**453,020**	**212,420**	**1,118,460**	**sf**
COVERAGE	55.3%	55.3%	49.3%	54.0%	
PARKING REQUIRED					
Office @ 1/250 s.f. (apply only if over 10% of GFA)					
Warehouse: 1st 20K @ 1/1,000 s.f.	20	20	20	60	stalls
2nd 20K @ 1/2,000 s.f	10	10	10	30	stalls
Above 40K @ 1/5,000 s.f.	83	83	35	201	stalls
TOTAL	**113**	**113**	**65**	**291**	**stalls**
AUTO PARKING PROVIDED					
Standard (9 'x 19')	225	220	95	540	stalls
Accessible Stalls (9'x19')	5	5	2	12	stalls
Accessible Stalls (12'x19') Van	2	2	2	6	stalls
TOTAL	**232**	**227**	**99**	**558**	**stalls**
TRAILER PARKING REQUIRED					
1 per 5,000 s.f. of GFA	91	91	43	225	stalls
TRAILER PARKING PROVIDED					
Trailer (10' x 53')	92	92	53	237	stalls
MAXIMUM FLOOR AREA RATIO					
F.A.R. - .55, .63 (See section 10.10 Development incentives)					
MAXIMUM BUILDING HEIGHT					
Height - 60'	50'	50'	50'		
BUILDING CLEAR HEIGHT	36'	36'	36'		
SETBACKS					
Cypress Ave. - 15'		Juniper Ave. - 20'			
Jurupa Ave. - 30'					
LANDSCAPE REQUIRED					
Percentage - 15% not including building area					
LANDSCAPE PROVIDED					
in percentage	17.3%	17.3%	25.2%	19.1%	
in s.f.	63,523	63,334	54,933	181,790	sf

Source(s): HPA (01-07-2019)

NOT TO SCALE

Figure 5

DESIGN REVIEW NO. 19-05

Project Name: Goodman Logistics Center Fontana III

CALIFORNIA
AIR RESOURCES BOARD

Mary D. Nichols, Chair
Jared Blumenfeld, CalEPA Secretary
Gavin Newsom, Governor

April 9, 2019

Ms. Dawn Rowe
Senior Planner
City of Fontana, Planning Division
8353 Sierra Avenue
Fontana, California 92335

Dear Ms. Rowe:

Thank you for providing the California Air Resources Board (CARB) with the opportunity to comment on the Notice of Preparation (NOP) for the Goodman Logistics Center Fontana III Project (Project) Draft Environmental Impact Report (DEIR), State Clearinghouse No. 2019039071. The Project consists of the construction and operation of three warehouse buildings totaling 1,118,460 square feet on 47.5 acres of land in the City of Fontana (City). Implementation of the Project would require a change to the existing land use designation from "Residential Planned Community (R-PC)" to "General Industrial (I-G)".

CARB staff is concerned about the air pollution impacts that would result should the City approve the Project, and the land use change from a residential planned community to general industrial, in order to build a large warehouse logistics center. Freight facilities, such as warehouse and distribution facilities, can result in high daily volumes of heavy-duty diesel truck traffic and operation of onsite equipment (e.g., forklifts, yard tractors, etc.) that emit toxic diesel emissions, and contribute to regional air pollution and global climate change.

Residences are located immediately south and east of the Project site, with the closest located approximately 20 feet south of the Project's southern boundary. Schools are located within one mile of the Project site, which include Ruth O. Harris Middle School, Jurupa Hills High School, and Citrus High School. The community is surrounded by existing toxic diesel emission sources, which include warehouses, the Union Pacific (UP) rail yard, and a major freeway (I-10). Due to the Project's proximity to residences and schools already disproportionately burdened by multiple sources of pollution, CARB staff is concerned with the potential cumulative health impacts associated with the construction and operation of the Project.

The State of California has placed additional emphasis on protecting local communities from the harmful effects of air pollution through the passage of Assembly Bill 617 (AB 617) (Garcia, Chapter 136, Statutes of 2017). AB 617 is a significant piece of air quality legislation that highlights the need for further emission reductions in communities

with high exposure burdens, like those in which the Project is located. Diesel emissions generated during the construction and operation of the Project would negatively impact the community, which is already disproportionally impacted by air pollution from existing freight facilities.

The California Environmental Protection Agency (CalEPA) defines a disadvantaged community as a community that scores within the top 25 percent of the census tracts, as analyzed by the California Communities Environmental Health Screening Tool Version 3.0 (CalEnviroScreen). CalEnviroScreen uses a screening methodology to help identify California communities currently disproportionately burdened by multiple sources of pollution. The census tract containing the Project is within the top 1 percent for Pollution Burden.[1] To that end, CARB urges the City to ensure that the Project and land use change do not adversely impact neighboring disadvantaged communities.

The NOP does not state whether the proposed warehouses would include cold storage. The operation of cold storage warehouses would include trucks with transport refrigeration units (TRU) that emit significantly higher levels of toxic diesel emissions, oxides of nitrogen (NO_x), and greenhouse gases than trucks without TRUs. Since it is unclear whether the Project would include cold storage warehouse space, any modeling done in support of the air quality analysis of the DEIR and associated health risk assessment (HRA) should assume that a conservative percentage of the truck and trailer fleet serving the Project are equipped with TRUs.

In addition to the health risk associated with operations, construction health risks should be included in the air quality section of the DEIR and in the Project's HRA. Construction of the Project would result in short-term diesel emissions from the use of both on-road and off-road diesel equipment. The Office of Environmental Health Hazard Assessment's (OEHHA) guidance recommends assessing cancer risks for construction projects lasting longer than two months. Since construction would very likely occur over a period lasting longer than two months, the HRA prepared for the Project should include health risks for existing residences near the Project site during construction.

The HRA performed in support of the Project should be based on the latest OEHHA guidance (2015 Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments),[2] and the South Coast Air Quality Management District's (SCAQMD) CEQA Air Quality Handbook.[3] To reduce emissions in disadvantaged communities already disproportionally impacted by air pollution, the final design of the

[1] Pollution Burden represents the potential exposures to pollutants and the adverse environmental conditions caused by pollution.

[2] Office of Environmental Health Hazard Assessment (OEHHA). Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments. February 2015. Accessed at: https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf

[3] South Coast Air Quality Management District (SCAQMD). 1993 Handbook. Accessed at: http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook

Project should include all existing and emerging zero-emission technologies to minimize NO_x and diesel emissions in all neighboring communities. CARB encourages the City and applicant to implement the measures listed in Attachment A of this comment letter to reduce the Project's construction and operational air pollution emissions.

The HRA should evaluate and present both the existing (current conditions) and future baselines (full build-out year, without the Project). The health risks modeled under both the existing and the future baselines should reflect all applicable federal, state, and local rules and regulations. By evaluating health risks using both baselines, the public and City planners will have a complete understanding of the potential health impacts that would result if 47.5 acres of land is converted from residential planned community to general industrial in order to accommodate the Project.

CARB appreciates the opportunity to comment on the NOP for the Project and is able to provide assistance on zero-emission technologies and emission reduction strategies, as needed. Please include CARB on your State Clearinghouse list of selected State agencies that will receive the DEIR as part of the comment period. If you have questions, please contact Stanley Armstrong, Air Pollution Specialist, at (916) 440-8242 or via email at stanley.armstrong@arb.ca.gov.

Sincerely,

Richard Boyd

Richard Boyd, Chief
Risk Reduction Branch
Transportation and Toxics Division

Attachment

cc: See next page.

cc: State Clearinghouse
P.O. Box 3044
Sacramento, California 95812

Carlo De La Cruz
Sierra Club
2101 Webster Street, Suite 1300
Oakland, California 94612

Morgan Capilla
NEPA Reviewer
U.S. Environmental Protection Agency
Air Division, Region 9
75 Hawthorne Street
San Francisco, California 94105

Lijin Sun
Program Supervisor - CEQA
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, California 91765

Andrea Vidaurre
Center for Community Action and Environmental Justice
P.O. Box 33124
Riverside, California 92519

ATTACHMENT A

Recommended Air Pollution Emission Reduction Measures for Warehouses and Distribution Centers

To minimize exposure burdens from air pollution, California Air Resources Board (CARB) staff recommends developers and government planners use all existing and emerging zero to near-zero emission technologies during project construction and operation. Below are some measures, currently recommend by CARB staff, specific to warehouse and distribution center projects. These recommendations are subject to change as new zero-emission technologies become available.

Recommended Construction Measures

1. Ensure the cleanest possible construction practices and equipment are used. This includes eliminating the idling of diesel-powered equipment, and providing the necessary infrastructure (e.g. electrical hookups) to support zero and near-zero equipment and tools.

2. Implement, and plan accordingly for, the necessary infrastructure to support the zero and near-zero emission technology vehicles and equipment that will be operating onsite. This includes the physical (e.g. needed footprint), energy, and fueling infrastructure for construction equipment, onsite vehicles and equipment, and medium-heavy and heavy-heavy duty trucks.

3. In construction contracts, include language that requires all off-road diesel-powered equipment used during construction to be equipped with Tier 4 or cleaner engines, except for specialized construction equipment in which Tier 4 engines are not available. In lieu of Tier 4 engines, equipment can incorporate retrofits such that emission reductions achieved equal or exceed that of a Tier 4 engine.

4. In construction contracts, include language that requires all off-road equipment with a power rating below 19 kilowatts (e.g., plate compactors, pressure washers, etc.) used during project construction be battery powered.

5. In construction contracts, include language that requires all heavy-duty trucks entering the construction site, during either the grading or building construction phases be model year 2014 or later. Starting in the year 2022, all heavy-duty haul trucks should also meet CARB's lowest optional low-NO_x standard.[1]

[1] In 2013, CARB adopted optional low-NO_x emission standards for on-road heavy-duty engines. CARB staff encourages engine manufacturers to introduce new technologies to reduce NO_x emissions below the current mandatory on-road heavy-duty diesel engine emission standards for model years 2010 and later. CARB's optional low-NO_x emission standard is available at https://www.arb.ca.gov/msprog/onroad/optionnox/optionnox.htm.

6. In construction contracts, include language that requires all construction equipment and fleets to be in compliance with all current air quality regulations. CARB staff is available to provide assistance in implementing this recommendation.

Recommended Operation Measures

1. Include contractual language in tenant lease agreements that require tenants to use the cleanest technologies available, and to provide the necessary infrastructure to support zero-emission vehicles and equipment that will be operating onsite.

2. Include contractual language in tenant lease agreements that requires all loading/unloading docks and trailer spaces be equipped with electrical hookups for trucks with transport refrigeration units (TRU) or auxiliary power units (APU). This will eliminate the amount of time that a TRU powered by a fossil-fueled internal combustion engine can operate from within the project site. Use of zero-emission all-electric plug-in TRUs, hydrogen fuel cell transport refrigeration, and cryogenic transport refrigeration are encouraged and can also be included lease agreements.[2]

3. Include contractual language in tenant lease agreements that requires all service equipment (e.g., yard hostlers, yard equipment, forklifts, and pallet jacks) used within the site to be electric or powered by compressed natural gas.

4. Include contractual language in tenant lease agreements that requires all heavy-duty trucks entering the project site to be model year 2014 or later.

5. Starting in the year 2022, include contractual language in tenant lease agreements that requires all trucks entering the project site to meet CARB's lowest optional low-NO_x standard.

[2] CARB's Technology Assessment for Transport Refrigerators provides information on the current and projected development of TRUs, including current and anticipated costs. The assessment is available at https://www.arb.ca.gov/msprog/tech/techreport/tru_07292015.pdf.

6. Include contractual language in tenant lease agreements that requires the tenant be in, and monitor compliance with, all current air quality regulations for on-road trucks including CARB's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation,[3] Periodic Smoke Inspection Program (PSIP),[4] and the Statewide Truck and Bus Regulation.[5]

7. Include contractual language in tenant lease agreements restricting trucks and support equipment from idling longer than five minutes while onsite.

8. Include contractual language in tenant lease agreements that limits onsite TRU diesel engine runtime to no longer than 15 minutes. If no cold storage operations are planned, include contractual language and permit conditions that prohibit cold storage operations unless a health risk assessment is conducted and the health impacts mitigated.

9. Include rooftop solar panels for each proposed warehouse to the extent feasible, with a capacity that matches the maximum allowed for distributed solar connections to the grid.

---

[3] In December 2008, CARB adopted a regulation to reduce greenhouse gas emissions by improving the fuel efficiency of heavy-duty tractors that pull 53-foot or longer box-type trailers. The regulation applies primarily to owners of 53-foot or longer box-type trailers, including both dry-van and refrigerated-van trailers, and owners of the heavy-duty tractors that pull them on California highways. CARB's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation is available at https://www.arb.ca.gov/cc/hdghg/hdghg.htm.

[4] The PSIP program requires that diesel and bus fleet owners conduct annual smoke opacity inspections of their vehicles and repair those with excessive smoke emissions to ensure compliance. CARB's PSIP program is available at https://www.arb.ca.gov/enf/hdvip/hdvip.htm.

[5] The regulation requires newer heavier trucks and buses must meet PM filter requirements beginning January 1, 2012. Lighter and older heavier trucks replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent. CARB's Statewide Truck and Bus Regulation is available at https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm.

DEPARTMENT OF TRANSPORTATION
DISTRICT 8
PLANNING (MS 725)
464 WEST 4th STREET, 6th FLOOR
SAN BERNARDINO, CA 92401-1400
PHONE (909) 388-7017
FAX (909) 383-5936
TTY 711
www.dot.ca.gov/dist8

Making Conservation a California Way of Life.

March 18, 2019 **File: 08-SBd-10-PM 15.843**

Dawn Rowe
City of Fontana
Planning Department
18353 Sierra Avenue
Fontana, CA 92335

Subject: Goodman Logistics Center Fontana III - Notice of Preparation of a Draft Environmental Impact Report

Dear Ms. Rowe:

Thank you for providing the California Department of Transportation (Caltrans) the opportunity to review and comment on the Notice of Preparation of a Draft Environmental Impact Report (DEIR) for the Goodman Logistics Center Fontana III (Project), located south of Santa Ana Avenue, north of Jurupa Avenue, east of Cypress Avenue, and west of Juniper Avenue, in the City of Fontana. The project proposes to develop three-building industrial park containing 1,118,460 square-foot of building floor area.

As the owner and operator of the State Highway System (SHS), it is our responsibility to coordinate and consult with local jurisdictions when a proposed development may impact our facilities. As the responsible agency under the California Environmental Quality Act, it is also our responsibility to make recommendations to offset associated impacts with the proposed project. Although the project is under the jurisdiction of the City of Fontana, due to the project's potential impact to the State facilities, including Interstate 10, it is also subject to the policies and regulations that govern the SHS.

In the preceding DEIR, we recommend a Traffic Impact Analysis (TIA) be prepared to accurately evaluate the extent of potential impacts of the project to the operational characteristics of the existing State facilities by the project area. Additionally, we recommend the TIA be submitted prior to the circulation of the DEIR to ensure timely review of the submitted materials and a preliminary scoping meeting to discuss any potential issues. We offer the following comments:

1) **Submit three hard copies of all TIA documents and one electronic files for review.** All State facilities within 5-mile radius of the Project should be analyzed in the TIA. The data used in the TIA should not be more than 2 years old, and shall be based on the Southern California Association of Governments 2016 Regional Transportation Plan Model. Use the Highway Capacity Manual 6 methodology for all traffic analyses. (See *Caltrans Guide for the Preparation of Traffic Impact Studies* at http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/tisguide.pdf)

Caltrans is committed to providing a safe transportation system for all users. We encourage the City to embark a safe, sustainable, integrated and efficient transportation system and complete street to enhance California's economy and livability. A pedestrian/bike-friendly environment served by multimodal transportation would reduce traffic congestion prevalent in the surrounding areas. (See *Complete Street Implementation Action Plan 2.0* at http://www.dot.ca.gov/hq/tpp/offices/ocp/docs/CSIAP2_rpt.pdf).

2) Provide a continuous multi-modal circulation system throughout the City, specifically for pedestrians, allowing current/future residents, employees, and guests to access the attraction places. A pedestrian friendly environment might have urban street frontages, shaded pedestrian links, and open spaces/pocket parks with the high visibility crosswalks. Consider employing roadway design features such as islands, pedestrian refuges, and pedestrian count-down signal as needed and appropriate to improve safety and to enhance walkability within the community.

3) We recommend that the City take advantage of currently available incentive programs, technical, and financial assistance from South Coast Air Quality Management District to implement efficiency measures and other low emission technology. Consider using energy efficient products, new lighting technology, "super-compliant" coatings, tree planting and the use of lighter colored roofing and paving materials which reduce energy usage by lowering the ambient temperature in the design of the new developments.

4) Relegate the parking spaces to the back of the buildings and locate preferential parking for vanpools and carpools, along with, secure, visible, and convenient bicycle parking/racks accessible to retail and office locations. Consider installing electric vehicle charging stations, and locate parking space for low-emitting, fuel-efficient, alternative-fueled vehicle visitor parking in commercial and office uses.

These recommendations are preliminary and summarize our review of materials provided for our evaluation. If this project is later modified in any way, please forward copies of revised plans as necessary so that we may evaluate all proposed changes for potential impacts to the SHS.

If you have any questions regarding this letter, please contact Jacob Mathew (909) 806-3928 or myself at (909) 383-4557.

Sincerely,

MARK ROBERTS
Office Chief, AICP
Intergovernmental Review, Community and Regional Planning

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

SENT VIA USPS AND E-MAIL: April 2, 2019

drowe@fontana.org
Dawn Rowe, Senior Planner
City of Fontana, Planning Division
8353 Sierra Avenue
Fontana, CA 92335

Notice of Preparation of a Draft Environmental Impact Report for the Proposed Goodman Logistics Center Fontana III[1]

South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. SCAQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the Proposed Project that should be included in the Draft Environmental Impact Report (EIR). Please send SCAQMD a copy of the Draft EIR upon its completion. Note that copies of the Draft EIR that are submitted to the State Clearinghouse are not forwarded to SCAQMD. Please forward a copy of the Draft EIR directly to SCAQMD at the address shown in the letterhead. **In addition, please send with the Draft EIR all appendices or technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files[2]. These include emission calculation spreadsheets and modeling input and output files (not PDF files). Without all files and supporting documentation, SCAQMD staff will be unable to complete our review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.**

Air Quality Analysis

SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from SCAQMD's Subscription Services Department by calling (909) 396-3720. More guidance developed since this Handbook is also available on SCAQMD's website at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993). SCAQMD staff also recommends that the Lead Agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: www.caleemod.com.

[1] The Proposed Project would include, among others, construction of three warehouses totaling 1,118,460 square feet on 47.5 acres.

[2] Pursuant to the CEQA Guidelines Section 15174, the information contained in an EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. Placement of highly technical and specialized analysis and data in the body of an EIR should be avoided through inclusion of supporting information and analyses as appendices to the main body of the EIR. Appendices to the EIR may be prepared in volumes separate from the basic EIR document, but shall be readily available for public examination and shall be submitted to all clearinghouses which assist in public review.

SCAQMD has also developed both regional and localized significance thresholds. SCAQMD staff requests that the Lead Agency quantify criteria pollutant emissions and compare the results to SCAQMD's CEQA regional pollutant emissions significance thresholds to determine air quality impacts. SCAQMD's CEQA regional pollutant emissions significance thresholds can be found here: http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf. In addition to analyzing regional air quality impacts, SCAQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LSTs can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the Proposed Project, it is recommended that the Lead Agency perform a localized analysis by either using the LSTs developed by SCAQMD staff or performing dispersion modeling as necessary. 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.

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 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). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), 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.

In the event that the Proposed Project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*") can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

In addition, guidance on siting incompatible land uses (such as placing homes near freeways) can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Health Perspective*, which can be found at: http://www.arb.ca.gov/ch/handbook.pdf. CARB's Land Use Handbook 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. Guidance[3] on strategies to reduce air pollution exposure near high-volume roadways can be found at: https://www.arb.ca.gov/ch/rd_technical_advisory_final.PDF.

SCAQMD Staff's Recommendation for Truck Trip Rates for High Cube Warehouse Projects

The Proposed Project will include, among others, construction of a 55,000-square-foot warehouse. SCAQMD staff recommends the use of truck trip rates from the Institute of Transportation Engineers

[3] In April 2017, CARB published a technical advisory, *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways: Technical Advisory*, to supplement CARB's Air Quality and Land Use Handbook: A Community Health Perspective. This technical advisory is intended to provide information on strategies to reduce exposures to traffic emissions near high-volume roadways to assist land use planning and decision-making in order to protect public health and promote equity and environmental justice. The technical advisory is available at: https://www.arb.ca.gov/ch/landuse.htm.

(ITE) for high cube warehouse projects located in SCAQMD (i.e. 1.68 average daily vehicle trips per 1,000 square feet and 0.64 average daily truck trips per 1,000 square feet). Consistent with CEQA Guidelines, the Draft EIR for the Proposed Project may use a non-default trip rate if there is substantial evidence supporting another rate is more appropriate for the air quality analysis.

Mitigation Measures

In the event that the Proposed Project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize these impacts. Pursuant to CEQA Guidelines Section 15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project, including:

- Chapter 11 "Mitigating the Impact of a Project" of SCAQMD'S *CEQA Air Quality Handbook.* SCAQMD's CEQA web pages available here: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies
- SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions and Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities
- SCAQMD's Mitigation Monitoring and Reporting Plan (MMRP) for the 2016 Air Quality Management Plan (2016 AQMP) available here (starting on page 86): http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf
- CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures* available here: http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf

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

- Require zero-emissions or near-zero emission on-road haul trucks such as heavy-duty trucks with natural gas engines that meet the CARB's adopted optional NOx emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr), if and when feasible. At a minimum, require that vendors, contractors, and/or haul truck operators commit to using 2010 model year trucks (e.g., material delivery trucks and soil import/export) that meet CARB's 2010 engine emissions standards at 0.01 g/bhp-hr of particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks[4]. The Lead Agency should include this requirement in applicable bid documents, purchase orders, and contracts. Operators shall maintain records of all trucks associated with project construction to document that each truck used meets these emission standards, and make the records available for inspection. The Lead Agency should conduct regular inspections to the maximum extent feasible to ensure compliance.
- Have truck routes clearly marked with trailblazer signs, so that trucks will not enter residential areas.
- Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the Final CEQA document. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the Proposed Project through CEQA prior to allowing this land use or higher activity level.

[4] Based on a review of the California Air Resources Board's diesel truck regulations, 2010 model year diesel haul trucks should have already been available and can be obtained in a successful manner for the project construction California Air Resources Board. March 2016. Available at: http://www.truckload.org/tca/files/ccLibraryFiles/Filename/000000003422/California-Clean-Truck-and-Trailer-Update.pdf (See slide #23).

- Provide electric vehicle (EV) Charging Stations (see the discussion below regarding EV charging stations).
- Should the Proposed Project generate significant regional emissions, the Lead Agency should require mitigation that requires accelerated phase-in for non-diesel powered trucks. For example, natural gas trucks, including Class 8 HHD trucks, are commercially available today. Natural gas trucks can provide a substantial reduction in health risks, and may be more financially feasible today due to reduced fuel costs compared to diesel. In the Final CEQA document, the Lead Agency should require a phase-in schedule for these cleaner operating trucks to reduce any significant adverse air quality impacts. SCAQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency.
- Trucks that can operate at least partially on electricity have the ability to substantially reduce the significant NOx impacts from this project. Further, trucks that run at least partially on electricity are projected to become available during the life of the project as discussed in the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS)[5]. It is important to make this electrical infrastructure available when the project is built so that it is ready when this technology becomes commercially available. The cost of installing electrical charging equipment onsite is significantly cheaper if completed when the project is built compared to retrofitting an existing building. Therefore, SCAQMD staff recommends the Lead Agency require the Proposed Project and other plan areas that allow truck parking to be constructed with the appropriate infrastructure to facilitate sufficient electric charging for trucks to plug-in. Similar to the City of Los Angeles requirements for all new projects, SCAQMD staff recommends that the Lead Agency require at least 5% of all vehicle parking spaces (including for trucks) include EV charging stations[6]. Further, electrical hookups should be provided at the onsite truck stop for truckers to plug in any onboard auxiliary equipment. At a minimum, electrical panels should be appropriately sized to allow for future expanded use.
- Design the Proposed Project such that entrances and exits are such that trucks are not traversing past neighbors or other sensitive receptors.
- Design the Proposed Project such that any check-in point for trucks is well inside the Proposed Project site to ensure that there are no trucks queuing outside of the facility.
- Design the Proposed Project to ensure that truck traffic within the Proposed Project site is located away from the property line(s) closest to its residential or sensitive receptor neighbors.
- Restrict overnight parking in residential areas.
- Establish overnight parking within the Proposed Project where trucks can rest overnight.
- Establish area(s) within the Proposed Project site for repair needs.
- Develop, adopt and enforce truck routes both in and out of city, and in and out of facilities.
- Create a buffer zone of at least 300 meters (roughly 1,000 feet), which can be office space, employee parking, greenbelt, etc. between the Proposed Project and sensitive receptors.

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

- Maximize use of solar energy including solar panels; installing the maximum possible number of solar energy arrays on the building roofs and/or on the project site to generate solar energy for the facility.
- Maximize the planting of trees in landscaping and parking lots.

[5] Southern California Association of Governments. Accessed at: http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx.
[6] City of Los Angeles. Accessed at: http://ladbs.org/LADBSWeb/LADBS_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf.

- Use light colored paving and roofing materials.
- Utilize only Energy Star heating, cooling, and lighting devices, and appliances.
- Require use of electric or alternatively fueled sweepers with HEPA filters.
- Use of water-based or low VOC cleaning products that go beyond the requirements of SCAQMD Rule 1113.

Alternatives

In the event that the Proposed Project generates significant adverse air quality impacts, CEQA requires the consideration and discussion of alternatives to the project or its location which are capable of avoiding or substantially lessening any of the significant effects of the project. The discussion of a reasonable range of potentially feasible alternatives, including a "no project" alternative, is intended to foster informed decision-making and public participation. Pursuant to CEQA Guidelines Section 15126.6(d), the Draft EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Proposed Project.

Permits and SCAQMD Rules

In the event that the Proposed Project requires a permit from SCAQMD, SCAQMD should be identified as a Responsible Agency for the Proposed Project. The assumptions in the air quality analysis in the Draft EIR will be the basis for permit conditions and limits. For more information on permits, please visit SCAQMD's webpage at: http://www.aqmd.gov/home/permits. Questions on permits can be directed to SCAQMD's Engineering and Permitting staff at (909) 396-3385.

Data Sources

SCAQMD rules and relevant air quality reports and data are available by calling SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available at SCAQMD's webpage at: http://www.aqmd.gov.

SCAQMD staff is available to work with the Lead Agency to ensure that project air quality and health risk impacts are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at lsun@aqmd.gov or (909) 396-3308.

Sincerely,

Lijin Sun

Lijin Sun, J.D.
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources

LS
SBC190314-04
Control Number

825 East Third Street, San Bernardino, CA 92415-0835 | Phone: 909.387.8109 Fax: 909.387.7876
www.SBCounty.gov

SAN BERNARDINO COUNTY

Department of Public Works

- Flood Control
- Operations
- Solid Waste Management
- Surveyor
- Transportation

Kevin Blakeslee, P.E.
Director

Transmitted Via Email

April 8, 2019

City of Fontana
Attn: Dawn Rowe
8353 Sierra Avenue
Fontana, CA. 92335

File: 10(ENV)-4.01

RE: CEQA – NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE CITY OF FONTANA FOR THE GOODMAN LOGISTICS CENTER FONTANA III

Dear Ms. Rowe:

Thank you for allowing the San Bernardino County Department of Public Works the opportunity to comment on the above-referenced project. **We received this request on March 13, 2019** and pursuant to our review, the following comments are provided:

Traffic Division (Eanas Shanabo, Engineering Technician IV, 909-387-1869):

Please include the County of San Bernardino Department of Public Works Traffic Division in the scoping and traffic study review process.

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

Sincerely,

MICHAEL R. PERRY
Supervising Planner
Environmental Management

MRP:PE:sr
Email: drowe@fontana.org

From:	Dawn Rowe
To:	Tracy Zinn; David Ornelas
Cc:	Dawn Rowe; Orlando Hernandez
Subject:	FW: Goodman Logistics Center Fontana III NOP
Date:	Monday, April 22, 2019 8:26:16 AM
Importance:	High

FYI

Dawn Rowe
Senior Planner • Community Development
drowe@fontana.org • Office: (909) 350-6694

From: Ernie Perea <eperea@jurupavalley.org>
Sent: Thursday, April 18, 2019 12:05 PM
To: Dawn Rowe <drowe@fontana.org>
Cc: Steve Loriso <sloriso@jurupavalley.org>; Tom Merrell <tmerrell@jurupavalley.org>
Subject: Goodman Logistics Center Fontana III NOP

Dear Ms. Rowe,

The City of Jurupa Valley requests that the EIR include a discussion of any traffic impacts, air quality (including health risks), and noise impacts related to truck traffic along Sierra Avenue/ Armstrong Road leading to SR-60.

Kind Regards,

Ernie

Ernest Perea

CEQA Administrator

(951) 823-0432