



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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

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

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

Based on the Draft EIR, the Proposed Project would replace existing, underutilized airport-related buildings and site improvements with an air cargo center.¹ The Proposed Project development on a 97 acres site² includes an Air Cargo Sort Building, truckyard, parking facilities, two aviation-supporting buildings (ground service equipment GSE and aircraft line maintenance buildings), and aircraft apron improvements.³ The Proposed Project would be implemented in two phases: Phase 1 takes place on the easternmost 62 acres and Phase 2 on the remaining western 35 acres.⁴ The detailed construction component of each Phase is summarized below⁵:

Phase 1

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

¹ Draft EIR. Page 3.0-2.

² *Ibid.* Page 3.0-1.

³ *Ibid.* Page 3.0-2.

⁴ *Ibid.*

⁵ *Ibid.* Appendix 5.02-1. Air Quality Technical Report. Pages 31, 32, and 33 of 82.

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

Phase 2

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

There are 67 truck doors⁶ on the ground level associated with 672 truck trips per day for Phase 1 and Phase 2 combined.⁷ Most of the Proposed Project is located north of East Avion Street, with the remainder between East Avion Street and Mission Boulevard west of South Hellman Avenue.⁸ In addition, according to the provided maps in the Draft EIR, the Proposed Project site is in the southern-central of the Ontario International Airport. Based on the aerial photographs, South Coast AQMD finds that the sensitive receptors (e.g., residence, school) are more than 1,000 feet away from the Proposed Project. The construction of Phase 1 is expected to start in the third quarter of 2023 and be completed by the third quarter of 2025 when the proposed air cargo flight operations at the Airport will begin.⁹ The construction of Phase 2 is anticipated to start in the third quarter of 2027 and be completed by 2029.¹⁰

South Coast AQMD Staff's Comments on the Draft EIR

Overlapped Construction and Operational Activities Analysis

According to the Draft EIR, Phase 1 construction would be completed by the third quarter of 2025 when the air cargo flight operation begins,¹¹ while Phase 2 construction would start in the third quarter of 2027.¹² Hence, the possibility of overlapping construction (Phase 2) and operation (Phase 1) activities is likely to occur. However, the Draft EIR does not include an emissions analysis for these potential overlapped activities. Therefore, South Coast AQMD staff recommends that the Lead Agency revise the air quality analysis to include the analysis from overlapped activities to estimate emissions associated during the time. The estimated overlapped emissions should then be compared to South Coast AQMD's regional air quality CEQA operational thresholds to determine their significance level, and the results should be included in the Final EIR. If the overlapped emissions analysis is not included in the Final EIR, the Lead Agency should provide reasons for not having them supported by substantial evidence in the record.

⁶ *Ibid.* Page 3.0-12.

⁷ *Ibid.* Page 5.12-35.

⁸ *Ibid.* Page 3.0-1.

⁹ *Ibid.* Page 3.0-33.

¹⁰ *Ibid.* Page 3.0-34.

¹¹ *Ibid.* Page 3.0-33.

¹² *Ibid.* Page 3.0-34.

Baseline Conditions

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

Additional Recommended Air Quality and Greenhouse Gas Mitigation Measures

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

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

- Require zero-emissions (ZE) or near-zero emission (NZE) on-road haul trucks, such as heavy-duty trucks with natural gas engines that meet the CARB's adopted optional NOx emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr), if and when feasible. Given the state's clean truck rules and regulations aiming to accelerate the utilization and market penetration of ZE and NZE trucks, such as the Advanced Clean Trucks Rule¹⁷ and the Heavy-Duty Low NOx Omnibus Regulation¹⁸, ZE and NZE trucks will become increasingly more available to use. The Lead Agency should require a phase-in schedule to incentivize using these cleaner operating trucks to reduce any significant adverse air quality impacts. South Coast AQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency.

¹³ *Ibid.* Page 4.0-4.

¹⁴ *Ibid.*

¹⁵ *Ibid.* Appendix 5.02-1. Air Quality Technical Report. Page 1 of 82.

¹⁶ *Ibid.* Page 1.0.7.

¹⁷ CARB. June 25, 2020. *Advanced Clean Trucks Rule*. Accessed at: <https://ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks>.

¹⁸ CARB has recently passed a variety of new regulations that require new, cleaner heavy-duty truck technology to be sold and used in state. For example, on August 27, 2020, CARB approved the Heavy-Duty Low NOx Omnibus Regulation, which will require all trucks to meet the adopted emission standard of 0.05 g/hp-hr starting with engine model year 2024. Accessed at: <https://ww2.arb.ca.gov/rulemaking/2020/hdomnibuslownox>.

At a minimum, require the use of the 2010 model year¹⁹ that meets CARB's 2010 engine emissions standards at 0.01 g/bhp-hr of particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks. Where appropriate, include environmental analyses to evaluate and identify sufficient electricity and supportive infrastructures in the Energy and Utilities and Service Systems Sections in the CEQA document. Include the requirement in applicable bid documents, purchase orders, and contracts. Operators shall maintain records of all trucks associated with project construction to document that each truck used meets these emission standards and make the records available for inspection. The Lead Agency should conduct regular inspections to the maximum extent feasible to ensure compliance.

- Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the Final CEQA document. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the Proposed Project through CEQA prior to allowing this higher activity level.
- Provide electric vehicle (EV) charging stations or, at a minimum, provide the electrical infrastructure, and electrical panels should be appropriately sized. Electrical hookups should be provided for truckers to plug in any onboard auxiliary equipment.

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

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

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

- Clearly mark truck routes with trailblazer signs so that trucks will not travel next to or near sensitive land uses (e.g., residences, schools, daycare centers, etc.)
- Design the Proposed Project such that truck entrances and exits are not facing sensitive receptors and trucks will not travel past sensitive land uses to enter or leave the Proposed Project site
- Design the Proposed Project such that any check-in point for trucks is inside the Proposed Project site to ensure that no trucks are queuing outside
- Design the Proposed Project to ensure that truck traffic inside the Proposed Project site is as far away as feasible from sensitive receptors
- Restrict overnight truck parking in sensitive land uses by providing overnight truck parking inside the Proposed Project site

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

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

- State of California – Department of Justice: Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act²⁰
- South Coast AQMD 2022 South Coast Air Quality Management Plan,²¹ specifically:
 - Appendix IV-A – South Coast AQMD’s Stationary and Mobile Source Control Measures
 - Appendix IV-B – CARB’s Strategy for South Coast
 - Appendix IV-C – SCAG’s Regional Transportation Strategy and Control Measures
- United States Environmental Protection Agency (U.S. EPA): Mobile Source Pollution - Environmental Justice and Transportation²²

South Coast AQMD Permits and Responsible Agency

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

Conclusion

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

²⁰ State of California – Department of Justice. Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act. Access at: <https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf>

²¹ 2022 South Coast AQMP. Access at: <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan>

²² United States Environmental Protection Agency (U.S. EPA): Mobile Source Pollution - Environmental Justice and Transportation. Access at: <https://www.epa.gov/mobile-source-pollution/environmental-justice-and-transportation>

²³ 2022 CEQA Statutes and Guidelines section 21092.5(a): “At least ten days prior to certifying an environmental impact report, the lead agency shall provide a written proposed response to a public agency on comments made by that agency which conform with the requirements of this division. Proposed responses shall conform with the legal standards established for responses to comments on draft environmental impact reports. Copies of responses or the environmental document in which they are contained, prepared in conformance with other requirements of this division and the guidelines adopted pursuant to Section 21083, may be used to meet the requirements imposed by this section.” Access at: https://www.califaep.org/docs/2022_CEQA_Statute_and_Guidelines.pdf

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

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

Sincerely,

Sam Wang

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Planning, Rule Development & Implementation

SW:DN

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