



APPENDIX 1.0-3

NOP Comments



NATIVE AMERICAN HERITAGE COMMISSION

October 20, 2021

Nicole Walker, Environmental Planning Manager
Ontario International Airport Authority
1923 East Avion Street
Ontario, CA 91761

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NAHC HEADQUARTERS
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Re: 2021100226, Ontario International Airport South Airport Cargo Center Project, San Bernardino County

Dear Ms. Walker:

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

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, subds. (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

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.

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 (http://ohp.parks.ca.gov/?page_id=1068) 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:
Andrew.Green@nahc.ca.gov.

Sincerely,



Andrew Green
Cultural Resources Analyst

cc: State Clearinghouse



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:

November 9, 2021

nwalker@flyontario.com

Nicole Walker, Environmental Planning Manager
Ontario International Airport Authority
1923 East Avion Street
Ontario, California 91761

Notice of Preparation of Environmental Impact Report for the Ontario International Airport South Airport Cargo Center 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 and electronic versions of all emission calculation spreadsheets, and 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 website¹ as guidance when preparing the air quality and greenhouse gas analyses. It is also recommended that the Lead Agency use the CalEEMod² 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 thresholds³ and localized significance thresholds (LSTs)⁴ 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 heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road

¹ 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>.

² CalEEMod is available free of charge at: www.caleemod.com.

³ 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>.

⁴ 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>.

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.

If the Proposed Project generates diesel emissions from long-term construction or attracts diesel-fueled vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment⁵.

In the event that implementation of the Proposed Project involves the use of stationary equipment (e.g., emergency generator and fire pump) that 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.

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 Handbook¹, South Coast AQMD's Mitigation Monitoring and Reporting Plan for the 2016 Air Quality Management Plan⁶, and Southern California Association of Government's Mitigation Monitoring and Reporting Plan for the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy⁷.

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 lsun@aqmd.gov.

Sincerely,

Lijin Sun

Lijin Sun

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS
SBC211021-02
Control Number

⁵ South Coast AQMD's guidance for performing a mobile source health risk assessment can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

⁶ South Coast AQMD's 2016 Air Quality Management Plan can be found at: <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf> (starting on page 86).

⁷ 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.



Department of Public Works

- Flood Control
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David Doublet, M.S., P.E.
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November 9, 2021

File: 10(ENV)-4.01

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

Transmitted Via Email

RE: CEQA –NOTICE OF PREPARATION (NOP) OF A DRAFT ENVIRONMENTAL IMPACT REPORT AND NOTICE OF A PUBLIC SCOPING MEETING FOR THE ONTARIO INTERNATIONAL AIRPORT SOUTH AIRPORT CARGO CENTER PROJECT

Dear Ms. Walker:

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 October 25, 2021** and pursuant to our review, we have the following comments:

Permits/Operations Support Division (Sameh Basta, Chief, 909-387-7995):

1. Portions of the Project are adjacent to the San Bernardino County Flood Control District (SBCFCD) right-of-way and facility. Any encroachments on the District's right-of-way or facilities, including but not limited to access, fencing and grading, utility crossings, landscaping, new and/or alteration to drainage connections will require a permit from the SBCFCD prior to start of construction. The necessity for permits, and any impacts associated with them, should be addressed in the EIR prior to adoption and certification. If you have any questions regarding this process, please contact the FCD Permit Section at (909) 387-1863

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Chief Executive Officer

Environmental Management Division (Jonathan Dillon, PWE III, Stormwater Program, 909-387-8119):

1. The project should follow the requirements laid out in the most current MS4 permit and Construction General Permit, compliance measure should be laid out in the EIR section for hydrology/water quality. Impacts to Hydrology/Water Quality and proposed mitigation for those impacts should be disclosed in the EIR prior to certification or adoption.

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 Perry

MICHAEL R. PERRY

Supervising Planner

Environmental Management

MP:AJ:nl



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November 10, 2021

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Ontario International Airport South Airport Cargo Center (SCH No. 2021100226)- Project Notice of Preparation (NOP) of Environmental Impact Report (EIR) and Scoping Meeting

Ms. Walker,

The City of Ontario Planning Department appreciates the opportunity to comment on the above-mentioned project. The project proposes demolition of existing buildings, site improvements, and development of an air cargo facility. We offer the following comments and recommendations regarding the analysis of potential cultural resource impacts from the proposed project that should be included in the project Draft EIR. Please send with the Draft EIR, all appendices or technical documents related to cultural resources.

In 2016, the City of Ontario received a Certified Local Government (CLG) grant to *develop a historic context statement for the Ontario International Airport (ONT) and conduct an intensive level survey of aviation related properties older than 45 years* located within the bounds of ONT properties. City staff and ASM Affiliates, architectural preservation consultants, partnered with local non-profit preservation advocacy group, Ontario Heritage, and staff members from the Ontario International Airport Authority (OIAA) on the project. As a result of the survey, 3 historic districts (containing 18 contributors) and 9 individual buildings were identified as “Eligible” for local, state, and national registers based on local historic significance. Seven of the individually “Eligible” buildings were also found to be contributors to their perspective historic district. All other buildings within the survey boundary were determined to be ineligible for listing, and therefore, not historic. The table below summarizes historic resource eligibility findings and the local government action taken to list properties to local inventory. Once these properties were added to the inventory, they were then “ranked” based on Tier criteria contained in Section 4.02.040, Historic Preservation- Local Historic Landmark and Local District Designation, Historic Resource Tiering and Architectural Conservation Areas, of the Ontario Development Code.

Reconnaissance and intensive level survey record for each potential historic resource is attached to the ONT Historic Context (link below). The project also delivered a short history video with interviews with Ron Smith (Retired Tech Sargent Metal Shop for Air National Guard), Don Davidson (former Head of

Quality for GE Aviation in Ontario), Skip Bowling (President of Lockheed Aircraft Services in Ontario), Bill Wheeler (Air Traffic Controller at ONT), and Richard Delman (Local historian, pilot and owner of Otto Instruments). Please let me know if you have interest in the viewing the footage which served to inform the development of the historic context.

Ontario International Airport Historic Context and Survey:

https://www.ontarioca.gov/sites/default/files/Ontario-Files/Planning/Historic_Preservation/Historic%20Contexts/ONT%20Historic%20Context.pdf

Ontario Register of Historic Resources (local inventory):

https://www.ontarioca.gov/sites/default/files/Ontario-Files/Planning/Historic_Preservation/List%20of%20Historic%20Resources_web_20210930.pdf

Table. Survey Eligibility Findings and Local Government action

Name of Property	Theme/Sub-theme	NRHP Criteria	CRHR Criteria	Local Criteria	Tier (Local Action)
Lockheed Aircraft Services Historic District (10 Contributors)	Commercial Aviation, 1946-1967/ Aviation Support Services, 1952-1967	A,C	1	District 1-3	Tier I File No. PHP17-026
Terminal One Historic District (4 Contributors)	Civil Aviation, 1950-1967/Early Passenger Travel, 1950-1967/ Modernism and Aviation, 1955-1970	A,C	1	District 1-3	Tier I File No. PHP17-027
GE Aircraft Engines Historic District (4 Contributors)	Commercial Aviation, 1946-1967/ Aviation Support Services, 1952-1967/ Modernism and Aviation, 1955-1970	A	1	District 1-3	Tier I File No. PHP17-029
Lockheed Executive Office Building (Bldg. 10)	Aviation and Architecture, 1942-1975/ Modernism and Aviation, 1955-1970	C	3	Individual c-d, f-h	Tier I
Lockheed Cafeteria (Bldg. 11)	Aviation and Architecture, 1942-1975/ Modernism and Aviation, 1955-1970	C	3	Individual c-d, f-h	Tier I
Terminal One Building	Civil Aviation, 1950-1967/ Early Passenger Travel, 1950-1967/ Modernism and Aviation, 1955-1970	A, C	1, 3	Individual c-d, f-h	Tier I
Control Tower	Civil Aviation, 1950-1967/ Early Passenger Travel, 1950-1967	A	1, 3	Individual d, f-h	Tier I
Air National Guard Hangar	Aviation and Architecture, 1942-1975/ Developments in Construction Technology, 1942-1975	C	3	Individual d, f-h	Tier II File No. PHP17-028
Lockheed Hangar 2	Aviation and Architecture, 1942-1975/ Developments in Construction Technology, 1942-1975	C	3	Individual d, f-h	Tier I
Lockheed Hangar 4	Aviation and Architecture, 1942-1975/ Developments in Construction Technology, 1942-1975	C	3	Individual d, f-h	Tier I
Lockheed Hangar 6	Aviation and Architecture, 1942-1975/ Developments in Construction Technology, 1942-1975	C	3	Individual d, f-h	Tier I

Aerojet-General Hangar	Aviation and Architecture, 1942-1975/ Developments in Construction Technology, 1942-1975	C	3	Individual d, f-h	Tier II File No. PHP17-030
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Within the project site are 2 historic resources, *the Air National Guard Hangar* (individual landmark) and *the GE Aircraft Engines Historic District* (4 contributing buildings), that are eligible for listing on the National Register of Historic Places and are listed on the Ontario Register of Historic Resources (local inventory) pursuant to Section 7.0.010, the Ontario Register of Historic Resources, and Section .

The Planning Department recommends the environmental documentation (CEQA and NEPA) analyze alternatives to demolition which includes project avoidance, adaptive reuse of historic buildings, and relocation of buildings with the intent to minimize significant impacts to historic resources. If determined that alternatives to demolition are not feasible, then the project will result in significant and unavoidable impacts that will require mitigation measures.

Mitigation measures for the loss of historic resources may include Historic American Building Survey (HABS) documentation, salvage of architectural features and material, interpretative history or museum located within the airport boundary that is easily accessible to the public, historic context, payment of mitigation fees, naming streets/buildings after GE Aviation and the Air National Guard within project site, adaptive reuse study of airport hangars, and any other measure deemed appropriate.

If you should have any questions, please contact Diane Ayala, Senior Planner at (909) 395-2428 or myself at (909) 395-2422.

Sincerely,



Rudy Zeledon, Planning Director
CITY OF ONTARIO PLANNING DEPARTMENT

c: Scott Murphy, Community Development Executive Director, AICP



November 15, 2021

Ms. Nicole Walker, Environmental Planning Manager
Ontario International Airport Authority
1923 East Avion Street
Ontario, California 91761
E-mail: nwalker@flyontario.com

RE: SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Ontario International Airport South Airport Cargo Center Project [SCAG NO. IGR10499]

Dear Ms. Walker,

Thank you for submitting the Notice of Preparation of a Draft Environmental Impact Report for the Ontario International Airport South Airport Cargo Center Project (“proposed project”) to the Southern California Association of Governments (SCAG) for review and comment. SCAG is responsible for providing informational resources to regionally significant plans, projects, and programs per the California Environmental Quality Act (CEQA) to facilitate the consistency of these projects with SCAG’s adopted regional plans, to be determined by the lead agencies.¹

Pursuant to Senate Bill (SB) 375, SCAG is the designated Regional Transportation Planning Agency under state law and is responsible for preparation of the Regional Transportation Plan (RTP) including the Sustainable Communities Strategy (SCS). SCAG’s feedback is intended to assist local jurisdictions and project proponents to implement projects that have the potential to contribute to attainment of Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) goals and align with RTP/SCS policies. Finally, SCAG is also the authorized regional agency for Inter-Governmental Review (IGR) of programs proposed for Federal financial assistance and direct Federal development activities, pursuant to Presidential Executive Order 12372.

SCAG staff has reviewed the Notice of Preparation of a Draft Environmental Impact Report for the Ontario International Airport South Airport Cargo Center Project in San Bernardino County. The proposed project includes the relocation of the airport’s administrative offices and South Secured Area Access Point to other locations at the airport; demolition of existing buildings; and development of a 345,400 square foot (SF) cargo building, 2,600,000 SF aircraft apron with 23 aircraft parking stalls, a 104,300 SF parking structure and surface parking lot totaling 900 spaces, a 217,000 SF truck yard with 55 docks, and utility improvements on 76 acres.

When available, please email environmental documentation to IGR@scag.ca.gov providing, at a minimum, the full public comment period for review.

If you have any questions regarding the attached comments, please contact the Intergovernmental Review (IGR) Program, attn.: Anita Au, Senior Regional Planner, at (213) 236-1874 or IGR@scag.ca.gov. Thank you.

Sincerely,

Frank Wen, Ph.D.
Manager, Planning Strategy Department

¹ Lead agencies such as local jurisdictions have the sole discretion in determining a local project’s consistency with the 2020 RTP/SCS (Connect SoCal) for the purpose of determining consistency for CEQA.

SOUTHERN CALIFORNIA
ASSOCIATION OF GOVERNMENTS
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**COMMENTS ON THE NOTICE OF PREPARATION OF A
DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE
ONTARIO INTERNATIONAL AIRPORT SOUTH AIRPORT CARGO CENTER PROJECT [SCAG NO. IGR10499]**

CONSISTENCY WITH CONNECT SOCIAL

SCAG provides informational resources to facilitate the consistency of the proposed project with the adopted 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS or Connect SoCal). For the purpose of determining consistency with CEQA, lead agencies such as local jurisdictions have the sole discretion in determining a local project’s consistency with Connect SoCal.

CONNECT SOCIAL GOALS

The SCAG Regional Council fully adopted [Connect SoCal](#) in September 2020. Connect SoCal, also known as the 2020 – 2045 RTP/SCS, builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. The long-range visioning plan balances future mobility and housing needs with goals for the environment, the regional economy, social equity and environmental justice, and public health. The goals included in Connect SoCal may be pertinent to the proposed project. These goals are meant to provide guidance for considering the proposed project. Among the relevant goals of Connect SoCal are the following:

SCAG CONNECT SOCIAL GOALS	
Goal #1:	<i>Encourage regional economic prosperity and global competitiveness</i>
Goal #2:	<i>Improve mobility, accessibility, reliability and travel safety for people and goods</i>
Goal #3:	<i>Enhance the preservation, security, and resilience of the regional transportation system</i>
Goal #4:	<i>Increase person and goods movement and travel choices within the transportation system</i>
Goal #5:	<i>Reduce greenhouse gas emissions and improve air quality</i>
Goal #6:	<i>Support healthy and equitable communities</i>
Goal #7:	<i>Adapt to a changing climate and support an integrated regional development pattern and transportation network</i>
Goal #8:	<i>Leverage new transportation technologies and data-driven solutions that result in more efficient travel</i>
Goal #9:	<i>Encourage development of diverse housing types in areas that are supported by multiple transportation options</i>
Goal #10:	<i>Promote conservation of natural and agricultural lands and restoration of habitats</i>

For ease of review, we encourage the use of a side-by-side comparison of SCAG goals with discussions of the consistency, non-consistency or non-applicability of the goals and supportive analysis in a table format. Suggested format is as follows:

SCAG CONNECT SOCIAL GOALS	
Goal	Analysis
Goal #1: <i>Encourage regional economic prosperity and global competitiveness</i>	<i>Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference</i>
Goal #2: <i>Improve mobility, accessibility, reliability and travel safety for people and goods</i>	<i>Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference</i>
etc.	etc.

Connect SoCal Strategies

To achieve the goals of Connect SoCal, a wide range of land use and transportation strategies are included in the accompanying twenty (20) technical reports. Of particular note are multiple strategies included in Chapter 3 of Connect SoCal intended to support implementation of the regional Sustainable Communities Strategy (SCS) framed within the context of focusing growth near destinations and mobility options; promoting diverse housing choices; leveraging technology innovations; supporting implementation of sustainability policies; and promoting a Green Region. To view Connect SoCal and the accompanying technical reports, please visit the [Connect SoCal webpage](#). Connect SoCal builds upon the progress from previous RTP/SCS cycles and continues to focus on integrated, coordinated, and balanced planning for land use and transportation that helps the SCAG region strive towards a more sustainable region, while meeting statutory requirements pertinent to RTP/SCSs. These strategies within the regional context are provided as guidance for lead agencies such as local jurisdictions when the proposed project is under consideration.

DEMOGRAPHICS AND GROWTH FORECASTS

A key, formative step in projecting future population, households, and employment through 2045 for Connect SoCal was the generation of a forecast of regional and county level growth in collaboration with expert demographers and economists on Southern California. From there, jurisdictional level forecasts were ground-truthed by subregions and local agencies, which helped SCAG identify opportunities and barriers to future development. This forecast helps the region understand, in a very general sense, where we are expected to grow, and allows SCAG to focus attention on areas that are experiencing change and may have increased transportation needs. After a year-long engagement effort with all 197 jurisdictions one-on-one, 82 percent of SCAG’s 197 jurisdictions provided feedback on the forecast of future growth for Connect SoCal. SCAG also sought feedback on potential sustainable growth strategies from a broad range of stakeholder groups – including local jurisdictions, county transportation commissions, other partner agencies, industry groups, community-based organizations, and the general public. Connect SoCal utilizes a bottom-up approach in that total projected growth for each jurisdiction reflects feedback received from jurisdiction staff, including city managers, community development/planning directors, and local staff. Growth at the neighborhood level (i.e., transportation analysis zone (TAZ) reflects entitled projects and adheres to current general and specific plan maximum densities as conveyed by jurisdictions (except in cases where entitled projects and development agreements exceed these capacities as calculated by SCAG). Neighborhood level growth projections also feature strategies that help to reduce greenhouse gas emissions (GHG) from automobiles and light trucks to achieve Southern California’s GHG reduction target, approved by the California Air Resources Board (CARB) in accordance with state planning law. Connect SoCal’s Forecasted Development Pattern is utilized for long range modeling purposes and does not supersede actions taken by elected bodies on future development, including entitlements and development agreements. SCAG does not have the authority to implement the plan -- neither through decisions about what type of development is built where, nor what transportation projects are ultimately built, as Connect

SoCal is adopted at the jurisdictional level. Achieving a sustained regional outcome depends upon informed and intentional local action. To access jurisdictional level growth estimates and forecasts for years 2016 and 2045, please refer to the [Connect SoCal Demographics and Growth Forecast Technical Report](#). The growth forecasts for the region and applicable jurisdictions are below.

	Adopted SCAG Region Wide Forecasts				Adopted San Bernardino County Forecasts			
	Year 2020	Year 2030	Year 2035	Year 2045	Year 2020	Year 2030	Year 2035	Year 2045
Population	19,517,731	20,821,171	21,443,006	22,503,899	2,249,744	2,473,709	2,594,733	2,814,941
Households	6,333,458	6,902,821	7,170,110	7,633,451	667,637	750,565	792,938	874,796
Employment	8,695,427	9,303,627	9,566,384	10,048,822	833,640	925,934	971,543	1,063,848

MITIGATION MEASURES

SCAG staff recommends that you review the [Final Program Environmental Impact Report](#) (Final PEIR) for Connect SoCal for guidance, as appropriate. SCAG’s Regional Council certified the PEIR and adopted the associated Findings of Fact and a Statement of Overriding Considerations (FOF/SOC) and Mitigation Monitoring and Reporting Program (MMRP) on May 7, 2020 and also adopted a PEIR Addendum and amended the MMRP on September 3, 2020 (please see the [PEIR webpage](#) and scroll to the bottom of the page for the PEIR Addendum). The PEIR includes a list of project-level performance standards-based mitigation measures that may be considered for adoption and implementation by lead, responsible, or trustee agencies in the region, as applicable and feasible. Project-level mitigation measures are within responsibility, authority, and/or jurisdiction of project-implementing agency or other public agency serving as lead agency under CEQA in subsequent project- and site- specific design, CEQA review, and decision-making processes, to meet the performance standards for each of the CEQA resource categories.

EUNICE M. ULLOA
Mayor

MARC LUCIO
Mayor Pro Tem



KAREN C. COMSTOCK
CHRISTOPHER FLORES
WALT POCOCK
Council Members

MATTHEW C. BALLANTYNE
City Manager

CITY of CHINO

November 15, 2021

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

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

Dear Ms. Walker:

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

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

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

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



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

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

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

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

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

November 15, 2021

Nicole Walker

Page 3 of 3

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

Sincerely,



Eunice M. Ulloa

Mayor

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