

November 18, 2021

Mr. Steve Hollis
IDI Logistics
840 Apollo Street, Suite 100
El Segundo, CA 90245

**SUBJECT: WEST VALLEY LOGISTICS CENTER FOCUSED AIR QUALITY AND GREENHOUSE GAS
EVALUATION**

Dear Mr. Steve Hollis:

Urban Crossroads, Inc. is pleased to provide the following Focused Air Quality and Greenhouse Gas Evaluation for West Valley Logistics Center development (**Project**) which is located south of Jurupa Avenue and on either side of Locust Avenue/Armstrong Road in the City of Fontana. The purpose of this work effort is to determine if any additional impacts occur based on a comparison of the proposed Project to the currently approved project evaluated in the West Valley Logistics Center Air Quality Impact Analysis (dated January 12, 2018) and the West Valley Logistics Center Greenhouse Gas Analysis (dated January 17, 2018) referred to as the **2018 AQ Study & 2018 GHG Study**. This Assessment has been prepared to satisfy Condition of Approval 11 found in City Council Resolution No. 2019-041. This Condition of Approval requires an analysis of impacts generated by the Project, assuming that the Project is considered to be a Fulfillment Center (ITE Code 155).

SUMMARY OF FINDINGS

Results of the Assessment indicate that the proposed Project would not result in any significant impacts with respect to air quality and greenhouse gases associated with construction-source or operational-source emissions.

CURRENTLY APPROVED PROJECT EMISSIONS

The 2018 AQ Study and 2018 GHG Study evaluated impacts for a project consisting of 290,590 square feet of Warehousing use and 3,183,100 square feet of High-Cube Transload and Short-Term Storage Warehouse use ("Original Project"). Tables 1 and 2 summarize the operational air quality and greenhouse gas emissions as evaluated in the 2018 AQ Study & 2018 GHG Study.

TABLE 1: 2018 AQ STUDY MAXIMUM DAILY OPERATIONAL AIR QUALITY EMISSIONS SUMMARY

	Emissions (lbs/day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Currently Approved 2018 Project	109.16	523.57	370.79	3.20	141.20	43.47

TABLE 2: CURRENTLY APPROVED GHG EMISSIONS SUMMARY

Emission Source	Emissions (MT/yr)
	Total CO ₂ E
Currently Approved 2018 Project	60,631.32

CURRENTLY APPROVED PROJECT ASSUMPTIONS

As previously discussed, the Original Project consisted of Warehouse and High-Cube Transload, and Short-Term Storage Warehouse uses (ITE 152). The analysis prepared for the Original Project assumed a fleet mix of 100% light duty autos for passenger cars and a mix of 22% light duty, 18% medium duty, and 60% heavy duty trucks. The analysis for the Original Project also conservatively assumed trip lengths of 17.4 miles for passenger cars and 59.0 miles for trucks. At the time the Original Project analysis was prepared, CalEEMod version 2016.3.1 and associated vehicle emission factors from the EMFAC2014 model were the latest available.

PROPOSED 2021 PROJECT CHANGES

The 2021 Proposed Project (“2021 Project”) would consist of a Fulfillment Center instead (ITE 155). While the total number of vehicle trips is assumed to have increased with the 2021 Project, the fleet mix associated with a Fulfillment Center consists of a greater percentage of passenger cars and a substantial decrease in the percentage of trucks relative to the Original Project. Similar to the 2018 AQ Study & 2018 GHG Study, the 2021 Project evaluation also utilizes a conservative trip length of 17.4 miles for passenger cars and 59.0 miles for trucks. As shown in Table 3 below, the 2021 Project is expected to result in a greater number of daily passenger vehicle trips but a substantially lower number of daily truck trips. Due to lower emission rates associated with passenger cars, as well as the shorter passenger car trip lengths compared to trucks, the reduction in truck trips more than offset the increase in passenger car trips compared to the Original Project. Additionally, emissions from the 2021 Project were calculated using the latest version of CalEEMod (version 2020.4.0), which incorporates vehicle emission factors from the EMFAC2017 model. The trip generation assessment for the Project is included in its entirety in Attachment C and presents a detailed comparison of the trip generation assumptions between the Original Project and the 2021 Project.

TABLE 3: COMPARISON OF ORIGINAL PROJECT AND 2021 PROJECT DAILY TRIPS

	Daily Trips		
	Passenger Cars	Trucks	Total
Currently Approved Original Project	3,426	1,536	4,962
2021 Project	5,628	664	6,292
Net Change	+2,202	-872	+1,330

PROPOSED 2021 PROJECT EMISSIONS

The 2021 Project site plan reflects a total of 3,439,197 square feet between 6 buildings.

Construction activity associated with the 2021 Project would be similar to what was evaluated in the 2018 AQ Study & 2018 GHG Study, since the construction evaluated in these studies covered the same physical land and disturbance area and is similar in size. As such, construction associated with the 2021 Project would not result in new or substantively different or substantively increased construction air quality or greenhouse gas impacts.

Tables 4 and 5 summarize the operational air quality and greenhouse gas emissions resulting from the 2021 Project; emissions summaries are presented in Attachment A and B for air quality and greenhouse gas emissions, respectively.

TABLE 4: 2021 PROJECT MAXIMUM DAILY OPERATIONAL AIR QUALITY EMISSIONS SUMMARY

	Emissions (lbs/day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
2021 Project	96.07	312.48	334.61	1.88	118.91	35.97

TABLE 5: 2021 PROJECT GHG EMISSIONS SUMMARY

Emission Source	Emissions (MT/yr)
	Total CO ₂ E
2021 Project	37,435.10

AIR QUALITY AND GREENHOUSE GAS EMISSIONS COMPARISON

Tables 6 and 7 compare air quality and greenhouse gas emissions generated by the Original Project to

the 2021 Project. As shown, there would be a net decrease in air quality and greenhouse gas emissions associated with the 2021 Project. With the change in the proposed Project from a High-Cube Transload and Short-Term Storage Warehouse to a Fulfillment Center, and the associated changes in the fleet mix which result in fewer truck trips based on the proposed land use changes, emissions would be significantly reduced. Emissions are further reduced due to the Project’s operating year being updated from 2018 to 2021, as it assumed that newer vehicle fleets meet stricter emission standards. Finally, the 2021 Project emissions were modeled using the latest version of CalEEMod (version 2020.4.0), which utilizes the latest emission factors (e.g. more stringent regulations equates less polluting passenger car and trucks compared to the 2018 Project).

As such, the 2021 Project would not result in new or substantively different or substantively increased air quality or greenhouse gas impacts.

TABLE 6: AIR QUALITY EMISSIONS COMPARISON

	Emissions (lbs/day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Original Project	109.16	523.57	370.79	3.20	141.20	43.47
2021 Project	96.07	312.48	334.61	1.88	118.91	35.97
Net Change	-13.09	-211.09	-36.18	-1.32	-22.29	-7.50

TABLE 7: GHG EMISSIONS COMPARISON

Emission Source	Annual Emissions (MTCO _{2e})
Original Project	60,631.32
2021 Project	37,435.10
Net Change	-23,196.22

If you have any questions, please contact me directly at hqureshi@urbanxroads.com.

Respectfully submitted,

URBAN CROSSROADS, INC.



Haseeb Qureshi,
 Associate Principal



Michael Tirohn,
 Environmental Scientist

ATTACHMENT "A"

ATTACHMENT "B"

ATTACHMENT "C"