

# **E. Avion Street and E. Jurupa Street Realignment and Improvements at Ontario International Airport (ONT)**

## **Explanation of Project's Categorical Exemption from the California Environmental Quality Act (CEQA) Under CEQA Guideline Sections 15300 - 15333**

### **Introduction**

The Ontario International Airport Authority (OIAA), owner and operator of the Ontario International Airport (ONT), in the City of Ontario (City), California applies applicable Categorical Exemptions under CEQA Guidelines Sections 15300 – 15333 to reconstruct, improve, and realign portions of E. Avion Street and E. Jurupa Street on ONT and City property between S. Vineyard Avenue and S. Archibald Avenue for safety and rehabilitation purposes.

### **Existing Condition**

As shown on **Figure 1**, the project includes an approximately one-mile segment of two-lane roadway along E. Avion Street and E. Jurupa Street located in an industrial area just south of the airfield. E. Avion Street within ONT right-of-way and E. Jurupa Street is currently within City of Ontario right-of-way. The existing speed limit is 30 miles per hour (MPH), however the high volume of truck traffic that traverses E. Avion Street to access E. Jurupa Street must do so at a very slow speed to safely navigate the nonstandard geometry. Even at slow speeds, however, large trucks often must encroach or swing into on-coming traffic lanes to complete turns on parts of the existing roadway alignment. Further, large trucks turning either way on the existing road slow down or block following traffic and present potential safety issues for the efficient flow of vehicles on the street.

The two streets are currently connected by two closely spaced 90-degree turns on E. Avion Street (See Figure 1, Inset A). In addition to design concerns on the roadway, the *ONT 2020 Airport Pavement Management System (APMS)* rates E. Avion Street near E. Jurupa Street (in the section to be realigned) with pavement condition index (PCI) ratings of “Very Poor” and “Serious.” (**Attachment 1**). E. Avion Street has a narrow two-lane bridge over the U.S. Army Corps of Engineer-owned Cucamonga Creek Channel, a concrete-lined flood control channel that runs in a north-south direction perpendicular to the roadway. Cucamonga Creek is considered a Water of the U.S (WOUS).

### **Proposed Project**

OIAA proposes to reconstruct, improve, and realign portions of E. Avion and E. Jurupa Streets for purposes of vehicular safety and efficiency on this critical roadway. Improvements would include pavement rehabilitation or reconstruction, the addition of a lane in each direction to more safely accommodate the passing and turning actions of large trucks, intersection signalization, striping, signage, utility infrastructure, grading, and drainage. The new roadway would be designed for a speed limit between 30 and 40 MPH. While this speed limit is similar to the existing speed limit, with the proposed project it will be safer to travel at the posted speed with improved horizontal curves, sight distance, lane widths, striping and signage consistent with current traffic design standards. The realignment of E. Avion Street also requires construction of a new bridge

to replace the existing bridge structure over the Cucamonga Creek Channel, as well as demolition of a vacant structure where the roadway is to be realigned. The proposed project consists of the following project components as shown on Figure 1 and detailed below:

- Reconstruct E. Avion Street from S. Vineyard Avenue to approximately S. Hellman Avenue and make improvements to the roadway within existing ONT right-of-way from two to four lanes;
- Realign E. Avion Street as four-lane roadway from S. Hellman Avenue to the Cucamonga Creek Channel;
- Reconstruct and make improvements to E. Jurupa Street from two lanes to four lanes from the Cucamonga Creek Channel to S. Archibald Avenue;
- Construct a new four-lane bridge over the Cucamonga Creek Channel; and
- Demolish vacant structure to accommodate realigned roadway.

A complete reconstruction of both the pavement and the curb and gutter are proposed along the roadway with the exception of the south side of E. Jurupa Street within City right-of-way, which will maintain the existing curb and gutter. While E. Jurupa Street is currently within City right-of-way, the additional lanes will be constructed on ONT property. Following construction of the roadway, the ownership of E. Jurupa will be split between ONT to the north and the City to the south. To ensure appropriate and consistent upkeep along the four lanes of roadway a maintenance easement (or similar) will be conveyed to the City.

To accommodate the E. Avion roadway improvements, some landscaping along the existing roadway will be cleared and grubbed. Utility placement within the project boundaries may result in a disturbance of up to eight feet below the existing ground elevation in some locations in order to accommodate below-ground utility re-routes and extensions for storm drain, sewer, and water as well as electrical, telecommunications and natural gas. Because the utility placement may be deeper than the previously disturbed depth, a field survey of the approximately one-mile roadway alignment was conducted to confirm the presence or absence of archaeological resources within the project limits. The Cultural Resources Technical Report (Archaeology) is available as **Attachment 2**. Additionally, as a component or element of the proposed project, a Native American monitor from or approved by the Gabrieleno Band of Mission Indians – Kizh Nation will be present during all ground-disturbing activities and protocols agreed upon for other OIAA construction activities would be followed in the unlikely event that any Kizh tribal cultural resources (“TCR”) are discovered.

The proposed project is within a Flood Insurance Rate Map (FIRM) designated 100-year flood zone. As the location is currently developed, the proposed project would not be expected to alter the floodplain or base flood elevation. Additionally, Cucamonga Creek is a WOUS, thus the new bridge structure is expected to require a USACE Section 10 permit. The preliminary design effort includes bridging the channel above the ordinary highwater mark and specifically above the existing concrete channel and therefore no impacts to the channel are expected.

To accommodate the realignment of E. Avion Street, one vacant structure needs to be demolished. The structure is approximately 3,300 SF and was previously associated with the Former Air National Guard facilities (“ANG 1” on Parcel 68). Because the building is over 45 years old, a qualified cultural resources firm evaluated the building to ensure there is no potential for

significance. The structure is included in the *Determination of Eligibility for Eight Structures at Ontario International Airport (ONT), Ontario, San Bernardino County, California* as “ANG 1” included in **Attachment 3**.

## **Project Need**

The roadway improvements are needed to improve safety for this critical airport roadway that is heavily used by vehicles and trucks accessing ONT cargo operations to reach distribution facilities in the Inland Empire near ONT. Improvements are needed to safely accommodate existing and future air cargo operations and existing heavy Southern California traffic. The improved roadway and bridge would reduce the volume of slow-moving and idling traffic on-airport, which would reduce emissions and ensure that critical freight is not delayed by antiquated airport infrastructure.

Existing E. Avion Street has exceeded its service life and does not meet current roadway design standards. Specifically, this includes standards for sight distance, turning radii, lane widths and the length of horizontal curves. Additionally, the roadway signage and lane striping do not meet current roadway design standards.

The existing high volume of truck traffic that traverses the roadway to access E. Jurupa Street to the east or Vineyard Avenue to the west must do so at a very slow speed to safely navigate the nonstandard geometry. The angle of the roadway and narrow lane widths make it difficult and unsafe for trucks to maneuver the roadway safely and causes frequent traffic “bottlenecks” as vehicles are required to reduce speed to less than 10 MPH to traverse them. Even at slow speeds, however, the large trucks often must encroach or swing into on-coming traffic lanes to complete turns on parts of the existing roadway alignment. Further, large trucks turning either way on the existing road slow down or block following traffic and present potential safety issues for the efficient flow of vehicles on the street. The inadequate design and narrow lane widths result in head-to-head vehicle conflicts at the turns as trucks cannot complete the turn in one movement. The roadway curvature, and particularly the two closely spaced 90-degree turns required on E. Avion Street to reach E. Jurupa Street is a known safety hazard. An additional lane in each direction along E. Avion and E. Jurupa Streets, which is needed to better safely facilitate the passing and turning actions for the frequency and type of use the roadway receives (e.g., large trucks).

Additionally, as explained under Existing Conditions, segments of the roadway are in disrepair and require full-depth reconstruction. The 2020 APMS report rates E. Avion Street near E. Jurupa Street (in the section to be realigned) with a PCI rating of “Very Poor” and “Serious” and requires a full-depth reconstruction (*Attachment 1*).

The existing two-lane bridge over the Cucamonga Creek Channel will be rendered obsolete by the E. Avion Street realignment. The bridge is narrow for trucks and the location adjacent to the two closely spaced 90-degree turns makes it difficult for trucks to maneuver and causes traffic bottlenecks and potential safety issues. The bridge is old and does not meet current seismic and geometric design standards and is flanked on both sides by roadways in “Very Poor” and “Serious” condition. A new bridge with four lanes to match the proposed E. Avion/ E. Jurupa Street is needed to connect the realigned roadways and also to meet current seismic and geometric design standards. The proposed structure would be constructed to ensure a long (75+ year) service life. There are no plans to demolish the existing bridge at this time however it will be closed to traffic once the new bridge is operational.

## Categorical Exemptions under CEQA

Through Public Resources Code Section 21084, the California Legislature directed the Secretary of Natural Resources to include within the State CEQA Guidelines a list of project “classes” which the Secretary determines do not have a significant effect on the environment and therefore shall be exempt from CEQA review.

Categorical exemptions are made up of classes of projects that generally are considered not to have potential impacts on the environment. A Lead Agency may apply multiple categorical exemptions to a single project, as long as each cited exemption applies to the project in full. This is sometimes referred to as “layering.”

Categorical exemptions are identified by the State Resources Agency and are defined in the CEQA Guidelines (14 CCR Section 15300-15331). As the proposed project does not have any adverse effects on the environment, and none of the exceptions in Public Resources Code Section 21084(c), (d), and (e) and State CEQA Guidelines Section 15300.2 are applicable to the proposed project, the lead agency (OIAA) has determined that the proposed project qualifies for a categorical exemption in accordance with the following CEQA Guidelines “classes” and described in detail below:

- 14 CCR 15301 (Class 15301- Existing Facilities); and
- 14 CCR 15302 (Class 15302 - Replacement or Reconstruction)

### Class 15301 – Existing Facilities

In accordance with 14 CCR Section 15301:

*Class 1 consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use. The types of “existing facilities” itemized below are not intended to be all-inclusive of the types of projects which might fall within Class 1. The key consideration is whether the project involves negligible or no expansion of use.*

Applicable examples, as provided by CEQA include the following:

*(c) Existing highways and streets, sidewalks, gutters, bicycle and pedestrian trails, and similar facilities (this includes road grading for the purpose of public safety), and other alterations such as the addition of bicycle facilities, including but not limited to bicycle parking, bicycle-share facilities and bicycle lanes, transit improvements such as bus lanes, pedestrian crossings, street trees, and other similar alterations that do not create additional automobile lanes;*

*(d) Restoration or rehabilitation of deteriorated or damaged structures, facilities, or mechanical equipment to meet current standards of public health and safety, unless it is determined that the damage was substantial and resulted from an environmental hazard such as earthquake, landslide, or flood;*

*(l) Demolition and removal of individual small structures listed in this subdivision:*

*(3) A store, motel, office, restaurant, or similar small commercial structure if designed for an occupant load of 30 persons or less. In urbanized*

*areas, the exemption also applies to the demolition of up to three such commercial buildings on sites zoned for such use.*

*(4) Accessory (appurtenant) structures including garages, carports, patios, swimming pools, and fences.*

#### Applicability to Proposed Project

The proposed project pertains to this class as it involves repair, maintenance and minor alteration of existing roadways (facilities) for purposes of public safety that involve negligible expansion of an existing use. The proposed project would be completed within existing setbacks and is being realigned and improved from two lanes to four lanes for purposes of safety and efficiency, as explained under *Project Need*. The project is within the ONT zoning district and is consistent with the allowable ONT land uses. The project will maintain the planned use of the roadway and is not intended to expand capacity.

Further, the rehabilitated, realigned, and reconstructed four-lane roadway on ONT and City property will connect with the existing four-lane Jurupa Street east of Archibald Avenue within the City of Ontario.

The existing roadways do not meet current design standards and as part of the proposed project, will be designed and upgraded to meet current design standards. As discussed under *Project Need*, sections of the roadways are considered “Very Poor” and “Serious” per the 2020 APMS and require full-depth reconstruction. The bridge over the Cucamonga Creek Channel on E. Avion Street would replace an existing structure (which will be obsolete and inaccessible) that does not meet current seismic and geometric design standards and is narrow for the trucks that use it. The new structure will connect the realignment of E. Avion Street with E. Jurupa Street and will replace the bridge with an improved bridge that meets current seismic and geometric design standards and will improve overall safety for vehicles. The bridge will be consistent with the new width of the roadway (four lanes).

Demolition of an abandoned 3,300 SF structure on airport property that is within the realigned roadway will be required. The building was previously part of former Air National Guard facilities. The structure does not have the potential for historic significance (*Attachment 3*).

#### Class 15302 – Replacement or Reconstruction

In accordance with 14 CCR Section 15302:

*Class 2 consists of replacement or reconstruction of existing structures and facilities where the new structure will be located on the same site as the structure replaced and will have substantially the same purpose and capacity as the structure replaced, including but not limited to:*

*(c) Replacement or reconstruction of existing utility systems and/or facilities involving negligible or no expansion of capacity.*

#### Applicability to Proposed Project

The proposed project pertains to this class as it involves the replacement and reconstruction of existing utility systems and facilities (roadway and bridge) involving negligible expansion of capacity. The roadway improvements will be located along the same primary alignment (same site) and within existing ONT and City right-of-way. The proposed project will serve the exact

same purpose as the structures and facilities being rehabilitated, reconstructed or replaced. E. Avion Street just west of the Cucamonga Creek Channel (S. Hellman Avenue cut-through) as it nears E. Jurupa Street, will divert from the existing alignment for purposes of safety. Beyond the need for the project due to existing disrepair of the roadways, the roadways will be improved for safety purposes from two lanes to four lanes within the existing setbacks, to allow large trucks to better maneuver and safely traverse the roadway as explained in the Project Need. The bridge will be replaced and relocated from its current placement by approximately 340 feet to the south to meet current seismic and geometric design standards and will create a safe, continuous transition from E. Avion Street to E. Jurupa Street along the improved roadway alignment.

Utilities along the roadway will be replaced, and in some cases, upgraded in accordance with the City's long-term utility infrastructure goals. As discussed under *Proposed Project*, utility placement may have a disturbance of up to eight feet below the existing ground elevation in some locations to accommodate below-ground utility re-routes and extensions for storm drain, sewer, and water. Any upgrades to utilities will not alter the use of the site and any capacity enhancements would be negligible and serve only to improve reliability and redundancy of the City's utility systems and infrastructure, which ultimately improves safety.

### **Conclusion**

This project consists of reconstructing, improving, and realigning portions of E. Avion Street and E. Jurupa Street on ONT and City property for purposes of public safety and efficiency. The proposed project does not have any adverse effects on the environment, and none of the exceptions in Public Resources Code Section 21084(c), (d), and (e) and State CEQA Guidelines Section 15300.2 are applicable to the proposed project. The proposed project meets the criteria cited under 14 CCR 15301 (Class 15301- Existing Facilities) and 14 CCR 15302 (Class 15302 - Replacement or Reconstruction). Therefore, the proposed project will have no significant effect on the environment and is categorically exempt from further CEQA review under CEQA Guidelines sections 15301 and 15302.

## **Summary of HNTB's Qualifications to Prepare This Analysis**

HNTB is a full-service planning, engineering, and architecture firm with a holistic approach to aviation planning. We provide airport clients with a deep and technically-diverse bench of industry-leading experts with a track record of successful delivery of projects across the country ranging from small focused studies to some of the largest and most complex projects. Our comprehensive aviation services — spanning the past 70 years — include every aspect of planning, designing, and constructing airport terminal, landside, airfield, cargo, and support facilities at more than 160 large- and medium-sized airports. HNTB's national aviation practice includes approximately 200 professionals who have implemented more than \$20 billion in airport construction and have completed more than 2,500 airport projects across the country. In Southern California, we have offices in Ontario, Los Angeles, Santa Ana, and San Diego. In these offices we have nearly 200 transportation infrastructure-focused employees including 40 that exclusively work on aviation projects. HNTB has been working at ONT since the late 1990s and has a thorough understanding of the physical, environmental, and operational characteristics and challenges that the airport faces.

Specific to our aviation environmental planning experience, across the nation, HNTB has prepared environmental documents for almost every major airport in the U.S. Throughout Southern California, HNTB has prepared CEQA and NEPA environmental documents for ONT, Los Angeles International Airport (LAX), Palm Springs International Airport (PSP), San Diego international Airport (SAN), and Long Beach Airport (LGB). HNTB's environmental planning practice includes more than 100 experts who have completed environmental projects for every mode of transportation.