



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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Draft Environmental Impact Report (EIR) for the Proposed Fontana Corporate Center (Proposed Project) (SCH No.: 2021080279)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The City of Fontana is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. The following comments on the Draft EIR include clarification and possible revisions to the CEQA operational air quality impact analysis.

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

Based on the Draft EIR, the Proposed Project consists of demolition of several existing structures and construction and operation of two warehouse buildings totaling 355,370 square feet on an approximately 18.5-acre site.¹ The Proposed Project is located north of the intersection of Slover Avenue and Business Drive in the City of Fontana, California 92335. The two warehouse buildings combined will include 47 loading docks and involve 170 truck trips per day.^{2,3} A railroad right-of-way and railroad yard are located north of the site while a railroad spur bisects the site.^{4,5,6} Construction of the Proposed Project is anticipated to begin in the third quarter of 2022 and operation is expected to begin in 2023.⁷

South Coast AQMD Staff's Comments on the Draft EIR

CEQA Air Quality Impacts Analysis – Operations

In the Draft EIR the Lead Agency states that a railroad right-of-way and railroad yard are located north of the Proposed Project site.⁸ Additionally, an existing railroad spur divides the Proposed Project site into east and west sections.⁹ Historically the railroad spur was utilized by manufacturing facilities on the site.¹⁰ Whether the Proposed Project will utilize rail as part of its

¹ Draft EIR. 1.0 Introduction. Page 1-2.

² *Ibid.* 3.0 Project Description. Page 3-7.

³ *Ibid.* Appendix B-3 Air Quality Impact Analysis. Page 44.

⁴ *Ibid.* 2.0 Environmental Settings. Page 2-1, 2-7.

⁵ *Ibid.* 3.0 Project Description. Page 3-8.

⁶ *Ibid.* 4.8 Hazards and Hazardous Materials. Page 4.8-4.

⁷ *Ibid.* Appendix B-3 Air Quality Impact Analysis. Page 41.

⁸ *Ibid.* 2.0 Environmental Settings. Page 2-1.

⁹ *Ibid.* 4.9 Hydrology and Water Quality. Page 4.9-1.

¹⁰ *Ibid.* 2.0 Environmental Settings. Page 2-7.

operations is unclear in the Draft EIR and its associated Appendices B1 and B2. The air quality impact analysis in the appendices does not appear to calculate emissions from operational rail activities. Staff recommends that if the Proposed Project will not utilize rail in its operational phase, then this should be clearly stated in the Final EIR.

If the Proposed Project will utilize rail in its operational phase, then to properly analyze the Proposed Project's operational air quality impacts from all future activities that are reasonably foreseeable at the time of the release of the Draft EIR, South Coast AQMD staff recommends that the Lead Agency quantify mass emissions and air concentrations from operational rail activities in the Final EIR.¹¹ Alternatively, if emissions from rail activities are not included in the Final EIR, the Lead Agency should provide reasons for not including them supported by substantial evidence in the record.

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 prior to the certification of the Final EIR. In addition, when the Lead Agency's position is at variance with recommendations raised in the comments, the 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, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not 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 Evelyn Aguilar, Air Quality Specialist, at eaguilar@aqmd.gov should you have any questions.

Sincerely,

Michael Morris

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MM:SW/EA
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Control Number

¹¹South Coast AQMD Modeling Guidance for AERMOD. Accessed at: <http://www.aqmd.gov/home/air-quality/meteorological-data/modeling-guidance#Receptor>.