



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
Citrus & Oleander Avenue at Santa Ana Avenue Project (Proposed Project)
Master Case No. 22-053 (SCH Number: 2022110389)**

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 recommended revision to the construction schedule, health risk assessment analysis, California Emissions Estimator Model analysis, regional operational emissions analysis, cumulative impacts discussion, additional air quality mitigation measures, and information about 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 proposes to change the General Plan land use designation and zoning classification on 29.4 acres from a residential to an industrial category¹ and incorporate the Proposed Project Site into the Southwest Industrial Park (SWIP) Specific Plan.² A development of three commerce center buildings with up to 540,849 square feet on approximately 24.4 acres of the Proposed Project site.³ The remaining 5 acres are not a part of the Proposed Project but are reasonably foreseeable to be developed with industrial use.⁴ The Proposed Project site is located north of Santa Ana Avenue and south of Jurupa Hills High School, between Citrus Avenue and Oleander Avenue, and at the northeast corner of Santa Ana Avenue and Oleander Avenue.⁵

Three commerce center buildings, designated as Building 1, Building 2, and Building 3, have the following detailed information:

Building 1⁶

- 151,618 square feet of floor area with 141,618 square feet of commerce center space
- Located at the northeast corner of the intersection of Citrus Avenue and Santa Ana Avenue

¹ Draft EIR. Page 1-2.

² *Ibid.* Page 3-5.

³ *Ibid.* Page 1-2

⁴ *Ibid.*

⁵ *Ibid.* Page 3-1.

⁶ *Ibid.* Page 3-11.

- 17 loading docks associated with 94 truck trips per day⁷
- Truck access via the northernmost driveway connecting with Citrus Avenue⁸

Building 2⁹

- 196,336 square feet of floor area with 180,336 square feet of commerce center space
- Located at the northwest corner of the intersection of Oleander Avenue and Santa Ana Avenue
- 26 loading docks associated with 118 truck trips per day¹⁰
- Truck access via the northernmost driveway connecting with Oleander Avenue¹¹

Building 3¹²

- 192,895 square feet of floor area with 176,895 square feet of commerce center space
- Located at the northeast corner of the intersection of Oleander Avenue and Santa Ana Avenue
- 26 loading docks associated with 116 truck trips per day¹³

With the development of three commerce center buildings, 328 daily truck trips¹⁴ are associated with the operational activities. Based on the aerial photographs, South Coast AQMD staff finds that the nearest sensitive receptors (e.g., schools and residences) are within 10-200 feet north and northwest of the Proposed Project site. The nearest school is adjacent north, and the nearest residents are approximately 200 feet northwest of the Proposed Project site. The construction will last approximately 18 months and is assumed to occur between January 2024 and June 2025.¹⁵

South Coast AQMD Staff's Comments on the Draft EIR

Construction Schedule

Under the Construction Characteristics – Project Description section of the Draft EIR, the Proposed Project discusses and presents the construction schedule in Table 3-2¹⁶ (Figure A). On the other hand, the CalEEMod output files¹⁷ represent a different schedule (Figure B).

⁷ *Ibid.* Appendix K-Traffic Analysis. Page 39.

⁸ *Ibid.* Page 3-20.

⁹ *Ibid.* Page 3-11.

¹⁰ *Ibid.* Appendix K-Traffic Analysis. Page 39.

¹¹ *Ibid.* Page 3-20.

¹² *Ibid.* Page 3-15.

¹³ *Ibid.* Appendix K-Traffic Analysis. Page 39.

¹⁴ *Ibid.* Appendix K-Traffic Analysis. Page 39.

¹⁵ *Ibid.* Page 4.3-20.

¹⁶ *Ibid.* Page 3-28.

¹⁷ *Ibid.* Appendix B1: Air Quality Impact Analysis. Page 161 of PDF.

**Figure A
Construction Schedule from Draft EIR**

Table 3-2 Construction Schedule

Construction Activity	Start Date	End Date	Days
Demolition/Crushing	1/2024	1/2024	20
Site Preparation	1/2024	2/2024	30
Grading	1/30/2024	2/30/2024	30
Building Construction	2/2024	12/2024	300
Paving	11/2024	12/2024	30
Architectural Coating	10/2024	11/2024	20

**Figure B
Construction Schedule from CalEEMod Output Files**

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase
Demolition	Demolition	1/1/2024	1/29/2024	5.00	20.0
Site Preparation	Site Preparation	1/30/2024	3/11/2024	5.00	30.0
Grading	Grading	3/12/2024	4/22/2024	5.00	30.0
Building Construction	Building Construction	4/23/2024	6/16/2025	5.00	300
Paving	Paving	2/11/2025	6/16/2025	5.00	90.0
Architectural Coating	Architectural Coating	3/25/2025	6/16/2025	5.00	60.0

Figure A and B illustrate the differences in paving and architectural coating schedules. Due to the discrepancy between the Draft EIR and the CalEEMod output files, South Coast AQMD staff recommends that the Lead Agency revise the schedule to be consistent between the documents 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.

Health Risk Assessment (HRA) Analysis

Averaging Time Utilized in Construction and Operational HRA Analysis

Based on the construction and operational HRA technical files, the averaging time for the analysis is ANNUAL.¹⁸ However, according to the South Coast AQMD Risk Assessment Procedures v8.1¹⁹ and South Coast AQMD Modeling Guidance for AERMOD,²⁰ the detailed HRA utilizing AERMOD should be run using the averaging time PERIOD and 1-hour. Since the construction and operational HRAs of the Proposed Project using ANNUAL, South Coast AQMD staff recommend that the Lead Agency re-run the construction and operational HRAs utilizing PERIOD and 1-hour averaging time to determine the health risk impacts to the sensitive receptors and off-

¹⁸ *Ibid.* Appendix B2 – Mobile Source Health Risk Assessment. Pages 98 and 269 of PDF.

¹⁹ South Coast AQMD Risk Assessment Procedures v8.1. Access at: <http://www.aqmd.gov/docs/default-source/permitting/rule-1401-risk-assessment/riskassessproc-v8-1.pdf>

²⁰ South Coast AQMD Modeling Guidance for AERMOD. Access at: <http://www.aqmd.gov/home/air-quality/meteorological-data/modeling-guidance>

site workers and include the revised results 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.

Building Downwash Option in Operational HRA

Based on the South Coast AQMD staff review, the HRA modeling file does not include the building downwash option in the operational HRA. The ground-level pollutant concentrations near the building would be underestimated if the downwash effects were absent in the dispersion modeling. Therefore, building downwash should be considered for the Proposed Project operation in order to predict more accurate ground-level concentrations. In addition, the truck idling emissions would need to be estimated separately and included in the dispersion modeling analysis and HRA as point sources. However, the operational HRA modeling file indicates those emissions as line volume source types. Thus, truck idling emissions should be modeled as point sources with a building downwash option selected.

In addition, it needs to be clarified in the Draft EIR if the stationary combustion engines (e.g., diesel firewater pump, diesel emergency generator, etc.) will be used on-site during operation. If any of these will be used when implementing the Proposed Project, they will need to be added as additional sources to the HRA and dispersion modeling files. Therefore, South Coast AQMD staff recommend that the Lead Agency revise the operational HRA modeling by incorporating the above recommendations and including the HRA results in the Final EIR. If the HRA modeling is not revised and included in the Final EIR, the Lead Agency should provide reasons supported by substantial evidence in the record to explain why the revision is not included.

California Emissions Estimator Model (CalEEMod) Analysis

The Lead Agency utilizes California Emissions Estimator Model (CalEEMod) version 2022.1 to calculate the Proposed project's emissions from construction and operational activities and includes the CalEEMod output files in Appendix B1: Air Quality Impact Analysis.²¹ South Coast AQMD staff has the following concerns regarding the CalEEMod output files and recommends that the Lead Agency review and revise the CalEEMod analysis and include the revision in the Final EIR.

User-Defined Industrial Land Use Subtype

In the operational CalEEMod output files, besides the “unrefrigerated warehouse-no rail” land use subtypes, “user-defined industrial” is added.²² According to the CalEEMod User Guide, the “user-defined” may be selected to characterize project land use subtypes that are not included in CalEEMod. If selected, all data on the Land Use screen will need to be input manually.²³ However, the size metric, lot acreage, and the floor square area use are all set to zero under the “user-defined industrial” land use subtype.

In addition, the truck information (e.g., truck trips) is input under the “user-defined industrial” but not in the “unrefrigerated warehouse-no rail” land use subtype. This possibly leads to

²¹ *Ibid.* Appendix B1: Air Quality Impact Analysis.

²² *Ibid.* Appendix B1: Air Quality Impact Analysis. Page 8/52 of CalEEMod Output Files.

²³ California Emissions Estimator Model (CalEEMod) Version 2022.1 User Guide. Access at: https://www.caleemod.com/documents/user-guide/CalEEMod_User_Guide_v2022.1.pdf

underestimating the heavy-duty truck emissions for warehouse activities since no data is filled under this “user-defined industrial” land use subtype.

Therefore, South Coast AQMD staff recommends that the Lead Agency explain why the land use is separated in the CalEEMod analysis; why the truck information is not under the “unrefrigerated warehouse-no rail” land use subtype and includes the explanation in the Final EIR. If the explanation is not included in the Final EIR, the Lead Agency should provide reasons for not having them supported by substantial evidence in the record.

Regional Operational Emissions Analysis

Utilizing CalEEMod version 2022.1, the Proposed Project analyzes the regional operational emissions compared to the South Coast AQMD Air Quality Significance Thresholds²⁴ and presents the results in Table 4.3-8²⁵ in the Draft EIR. The Proposed Project is concluded as less than significant for all the criteria pollutants. However, South Coast AQMD staff finds that emissions generated from area sources for VOC might need to be corrected since the VOC emissions are taken from the operational LST CalEEMod report instead of the regional CalEEMod report. Table A below illustrate the differences in VOC emissions from regional and LST reports.

Table A
VOC Emissions from Area Source Comparison

	Draft EIR²⁶	CalEEMod Regional Area Source²⁷	CalEEMod LST Area Source²⁸
Summer VOC Emissions (lbs/day)	16.90	61.2	16.90
Winter VOC Emissions (lbs/day)	13.00	57.4	13.00

In the event that the VOC emissions from area sources are incorrect in the Draft EIR and its appendices, the Proposed Project will likely exceed the South Coast AQMD Air Quality Significance Thresholds for VOC. Hence, South Coast AQMD staff recommends that the Lead Agency review the regional operational emissions analysis section, revise with the correct VOC emissions, and compare the total maximum daily operational emission to the significance thresholds to determine the significant level. In the event that the VOC emissions are significant, the Lead Agency is encouraged to discuss and include any feasible mitigation measures that help further reduce or minimize the VOC emissions and include the revision in the Final EIR. If the

²⁴ South Coast AQMD Air Quality Significance Thresholds. Access at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf>

²⁵ *Ibid.* Page 4.3-27.

²⁶ *Ibid.*

²⁷ *Ibid.* Appendix B1: Air Quality Impact Analysis. Page 152 and 153 of PDF.

²⁸ *Ibid.* Appendix B1: Air Quality Impact Analysis. Page 191 of PDF.

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.

In addition, Table 4.3-8²⁹ in the Draft EIR also discloses the emissions generated from on-site equipment sources; however, no further explanation or calculations are included in the Draft EIR or appendices to address how the emissions from on-site equipment sources are calculated. Therefore, South Coast AQMD staff recommends that the Lead Agency revise and include the analysis of the on-site equipment source in the Final EIR and its appendices for transparency and clarification purposes. 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.

Cumulative Impacts Discussion

Under Section 4.0.1 – Scope of Cumulative Impact Analysis,³⁰ the Proposed Project discusses the cumulative air quality impacts utilizing an approach that combines the summary of the projection approach with the listing approach, including a list of past, present, and reasonably foreseeable projects. A map is also included that shows the locations of these projects. The cumulative impacts discussion has followed the CEQA Guideline Section 15130(b).³¹ However, considering the Proposed Project’s location, South Coast AQMD has concerns regarding the cumulative impacts of the Proposed Project and other projects on sensitive receptors (e.g., residences and schools). Thus, South Coast AQMD staff recommended that the Lead Agency may take a further step in performing a more detailed and comprehensive quantitative analysis of the cumulative air toxic and potential health risk implications to be included in the Final EIR.

In addition, South Coast AQMD is currently working on updating its policy on “Cumulative Impacts from Air Toxics for CEQA Projects.” The Lead Agency is encouraged to participate in the Working Group Meetings held by South Coast AQMD CEQA team to get more updates regarding the policy. For more information, please visit South Coast AQMD’s webpage at: [http://www.aqmd.gov/home/rules-compliance/ceqa/ceqa-policy-development-\(new\)](http://www.aqmd.gov/home/rules-compliance/ceqa/ceqa-policy-development-(new)).

Additional Air Quality and Greenhouse Gas Mitigation Measures

Based on the Draft EIR, the Proposed Project construction and operational emissions do not exceed the South Coast AQMD Significance Thresholds and are defined to be less than significant. However, with the potential of exceeding VOC emissions during operation, as stated in the “Regional Operational Emissions Analysis” comment above, the Lead Agency should discuss and include any feasible mitigation measures (MMs) that help reduce the VOC emissions in the Final EIR. Furthermore, the Lead Agency proposes MM 4.8-1 and MM 4.8-2 to reduce greenhouse gas (GHG) emissions, although the conclusion remains as significant unavoidable cumulatively impact. Hence, South Coast AQMD staff strongly encourages the Lead Agency to review the references below and consider including the additional recommended mitigation measures to reduce further or minimize the Proposed Project’s impacts in the Final EIR.

²⁹ *Ibid.* Page 4.3-27.

³⁰ *Ibid.* Page 4.0.1.

³¹ 2023 CEQA Statutes and Guidelines Section 15130(b). Page 231. Access at: https://www.califaep.org/docs/CEQA_Handbook_2023_final.pdf

- State of California – Department of Justice: Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act³²
- South Coast AQMD 2022 South Coast Air Quality Management Plan,³³ 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 Transportation³⁴

South Coast AQMD Permits and Responsible Agency

If the implementation of the Proposed Project would require the use of new stationary equipment, including but not limited to emergency generators, fire water pumps, boilers, etc., permits from South Coast AQMD are required. The Final EIR should include a discussion on stationary equipment requiring South Coast AQMD permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project. Any assumptions used 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 ten days prior to the certification of the Final EIR.³⁵ 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 and reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines §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.

³² 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>

³³ 2022 South Coast AQMP. Access at: <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan>

³⁴ 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>

³⁵ 2023 CEQA Statutes and Guidelines Section 21092.5(a): “At least 10 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.” Page 67.

Access at: https://www.califaep.org/docs/2022_CEQA_Statue_and_Guidelines.pdf.

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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