



October 19, 2017

Orlando Hernandez, Planning Manager  
Rina Leung, Associate Planner  
City of Fontana, Development Services Organization - Planning Division  
8353 Sierra Avenue  
Fontana, CA 92335  
Re: Southwest Fontana Logistics Center -Draft Environmental Impact Report

Dear Orlando and Rina,

We are writing as a coalition of several organizations who are all concerned about the planned Southwest Fontana Logistics Center within the City of Fontana. Our coalition is made of community based organizations who work within the Inland Valleys on issues of environmental justice, active transportation and public health. Our coalition was formed in response to a growing concern of industrialization developments within the Inland Valleys. After reviewing the draft environmental impact report that has been prepared for the project, our coalition urges the Fontana Planning commission and City Council to deny this project due to its incompatibility with surrounding school and residential land uses, and the unacceptable health and safety risks to students attending school and children who live and play nearby. We categorized our concerns into three major topics and we request the City of Fontana to address and consider the following concerns as they relate to the development of the project.

**Our concerns include the following issues: 1. Traffic safety, 2. Public health and 3. Economic downturn.**

**Traffic safety concerns:**

- A. The location and size of the Southwest Fontana Logistics Center presents severe safety issues for surrounding residents and school children.** According to the EIR in section 3.1, the Southwest Fontana Logistics Center will occupy a total of 90.8 acres or 395,5248 square feet. The site location is proposed to be developed near “ *a residential community is located to the south; undeveloped land, a church, and low density residential properties are located to the east; a construction site with a small inclusion of residential properties are located to the west; a high school, undeveloped land, and low density residential uses are located to the north.* (Section 3.2.1). A site of this size needs to be in an area equipped to handle more industrial land uses, not near residents, people of faith or high schoolers.



**B. Proximity of the warehouse and freight truck traffic routes may result in severe injuries and fatalities for community members using walking and biking infrastructure.** We are concerned that the massive project is in dangerous proximity to residential homes, churches and the Jurupa Hills High School, as outlined in section 3.2.1 and the 3.3 figure map. We are concerned that the flow of freight trucks is a direct threat to pedestrians, cyclists and those who depend on modes of non-automobile forms of transit. In Fontana's Active Transportation 2017 draft report, it was noted that sidewalk gap closures and crosswalk improvements would be addressed from ¼ mile gaps. The city's plan to address ¼ mile gaps is insufficient and exposes a threat to vulnerable users such as school children and seniors. Furthermore, The National Partnership published a study in which it was reported that pedestrians and cyclists hit by an oncoming vehicle at 40 mile per hour has a 1 in 10 chance of survival<sup>1</sup>. While this traffic statistic is representative of adults and car collisions, we would anticipate the number to be even more dramatic in nature for vulnerable users who are minors struck by freight trucks.

**C. The project's traffic flow would cause a inconsistency within the circulation element of the City's General Plan.**The EIR makes no mention of alternative, proposed or restricted truck routes for the Southwest Fontana Logistics Center. Instead, the EIR mentions that the traffic flow of such a project is inconsistent with the circulation element of the City's General Plan guidelines, "*The project TIA demonstrates that the project will exceed General Plan LOS standards for certain intersections and roadways during peak hours for the City or adjacent cities under Baseline (2016), and Horizon Year 2040 conditions* (Table 4.16.M: General Plan Consistency – Traffic and Circulation). The EIR study found that the project will in fact have a considerable regional traffic impact on local roadways and would not able to hold the magnitude of truck capacity that the warehouse would yield. As noted above, the expected traffic capacity from the warehouse would result in more dangerous traffic conditions for communities walking, biking and driving.

### **Public Health, Air Quality, and Environmental Justice Concerns**

While traffic concerns stand by themselves, they also contribute to negative public health outcomes. In 2016, over 40,000 people were killed on the streets and research continues to show that low-income communities are disproportionately impacted by not just traffic violence, but other health impacts that come from traffic trundling through the neighborhood, especially on air quality.

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<sup>1</sup> [https://www.saferoutespartnership.org/sites/default/files/resource\\_files/042417-sr2s-visionzero-final.pdf](https://www.saferoutespartnership.org/sites/default/files/resource_files/042417-sr2s-visionzero-final.pdf)



The project will exacerbate increased cancer risk to the sensitive receptors at school site and at nearby homes. The EIR should take into great consideration the existing cumulative impacts that already produce poor air quality in the region and increased diesel emissions that have resulted from the proliferation of warehouse development in Fontana and nearby communities. The project's estimated truck trips should be framed in the context of already existing cumulative impacts not as a stand alone project, thus elevating the cancer risk for the surrounding community.

- A. Vehicle miles travelled from freight traffic will increase harmful air quality pollutants.** This project would increase truck and car traffic immediately. California children with asthma missed nearly 1.6 million days of school annually because of asthma<sup>2</sup>. Natural gas and big duty trucks affect ground level ozone in our region, side the rise of natural gas combustion and use in the logistics movement<sup>3</sup>.
- B. More input and information on environmental health impacts should be provided to the community.** As the planning commission, these Air Pollution facts should be taken into serious consideration and we must include accessible hearings for public members to provide input. At least one public participation hearing should occur at Jurupa Hills or Citrus High School. Plans should predict how much emission by volume will be polluted in the community.
- C. Some impacts cannot be mitigated.** Additionally, as identified in the Air Quality section of the Draft EIR, the project would have significant impacts that are unable to be mitigated. These impacts would be a huge detriment to the community as it already has a CalEnviroScreen 3.0 Pollution Burden score of 99th percentile<sup>4</sup>.

### **Economic challenges**

The desire for this project to come with a zone change from residential to industrial is especially egregious. The reduction in units of housing that this project would entail is particularly concerning in a region that continues to suffer from rents that are rising fast and an affordability crisis.

- A. The proposed project would result in displacing community residents from their homes.** The EIR makes note in Section 4.13 that residents will be displaced as the

<sup>2</sup> [https://dornsife.usc.edu/assets/sites/242/docs/FacingTheClimateGap\\_web.pdf](https://dornsife.usc.edu/assets/sites/242/docs/FacingTheClimateGap_web.pdf)

<sup>3</sup> [http://e360.yale.edu/features/ground\\_level\\_ozone\\_harming\\_plants\\_humans](http://e360.yale.edu/features/ground_level_ozone_harming_plants_humans)

<sup>4</sup>

<http://oehha.maps.arcgis.com/apps/webappviewer/index.html?id=4560cfbce7c745c299b2d0cbb07044f5>,  
Census Tract: 6071002601



proposed project develops with no mitigation required, “*The project site is currently developed with two dozen rural residences, and all of these units and households, which could be up to 50 persons or more, would eventually be displaced prior to construction of the proposed project. It is possible that relocation of these existing City residents would require some incremental amount of new housing to be constructed, but it is also likely displaced residents would find adequate housing within the existing unoccupied housing stock within the City of Fontana or adjacent communities.*” The subsection goes on to report that the impact of displacement is not significant and no mitigation is required, despite there being no effort to properly analyze Fontana’s affordable housing needs for low-income communities. Further study on Fontana’s affordable housing capacity is needed before any displacement processes occur.

**B. The transition to newer automated technology has lead to the economic instability of warehouse jobs.** According to a report by Center for Community Action and Environmental justice, the recently built Sketchers Warehouse promised 2,500 new jobs to the community of Moreno Valley but produced only 500 which were employees transferred from their old Ontario facility<sup>5</sup>. Only 1 new job employing a Moreno Valley resident was created. Automated technology is a cheaper and often more efficient mechanism for operations and poses major threats to the Inland Valleys job force.

### **Closing and Next Steps**

As we submit our coalition’s comments on the EIR, we anticipate the City of Fontana will address our issues and hear our community’s concerns. We would encourage the City of Fontana to hold a community forum on the warehouse proposal and EIR at a nearby school. We believe the City of Fontana needs to offer a space for more community residents to learn about the project’s impact and present their concerns in order to provide input on a solution. The EIR should also be recirculated to address the various concerns addressed in this letter and to discuss the existing cumulative toxic air contaminant impact coupled with potential future impacts.. Furthermore, our organizations would welcome a meeting with the planning commission and/or City staff to talk through concerns and questions we raised in this comment letter. We look forward to working with the City staff, planning commission and the logistics industry to reach an agreement that works best for the families all across the City of Fontana.

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<sup>5</sup> <http://ccaej.org/wp-content/uploads/2016/11/Inland-Ports-of-Southern-California.pdf>



Sincerely,

Demi Espinoza, Regional Policy Manager  
Safe Routes to School National Partnership

Marven Norman, Policy Director  
Inland Empire Biking Alliance

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