

April 14, 2026

Mr. Salvador Quintanilla
City of Fontana
8353 Sierra Avenue
Fontana CA 92335

SUBJECT: Response to SAFER Appeal Letter for Master Case No. 18-000053 (Hilton Industrial Facility)

Dear Salvador:

This letter has been prepared per the City's request for Lilburn Corporation to provide a response to the March 25, 2026 appeal letter from Lozeau Drury LLP's requesting the Planning Commission's denial of the project. SAFER requests that the City prepare an Initial Study to analyze and mitigate the Project's environmental impacts.

The CE Justification analysis documents that the Project is exempt from the California Environmental Quality Act (CEQA) under the Class 32 Categorical Exemption (CE) set forth in CEQA Guidelines Section 15332. The Justification Memorandum in the City's files for the Project, provides an introduction, project description, and evaluation of the Project's consistency with the requirements for a Class 32 CE. The Memorandum further evaluates whether any of the exceptions to categorical exemptions set forth in CEQA Guidelines Section 15300.2 apply to the Project.

CEQA Guidelines Section 15332 states that a Class 32 CE applies when:

- a) *The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.*
- b) *The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.*
- c) *The project site has no value as habitat for endangered, rare or threatened species.*
- d) *Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.*
- e) *The site can be adequately served by all required utilities and public services.*

As documented in the CE Justification, the Project is an allowable use under the City of Fontana General Plan (General Plan) land use designation of Light Industrial (I-L) and is zoned as West End Specific Plan (BP3). According to the General Plan, business parks, research and

development, technology centers, corporate and support office uses, clean industry, supporting retail uses, truck and equipment sales and related services are allowed. Warehouses that are designed in ways that limit off-site impacts are also permitted. The Proposed Project therefore has been evaluated as such in the General Plan EIR.

The Project Site is surrounded by a Target warehouse to the north, Vision Communications and Open Door Solutions to the east, Southern California Edison to the west, and a Service Partners, a building supply warehouse to the south. Surrounding uses predominantly consist of industrial uses.

The land uses and zoning designations surrounding the Project Site are as follows:

North: Uses to the north are designated Light Industrial (L-I) and zoned West End Specific Plan (BP3).

East: Uses to the east are designated Light Industrial (L-I) and zoned West End Specific Plan (BP3).

South: Uses to the south are designated Light Industrial (L-I) and zoned West End Specific Plan (BP3).

West: Uses to the west are designated Light Industrial (L-I) and zoned West End Specific Plan (BP3).

The analyses prepared for the subject project concludes that the Project meets all criteria shown above to qualify for an Infill Exemption and no significant impacts that could not be mitigated to levels of less than significant were identified. Based on the CE Justification Memo as well as expert review of the Proposed Project, substantial evidence supports the City's determination that the Project is categorically exemption under CEQA Guidelines section 15332.

If you should have any questions or require additional information, please do not hesitate to give us a call.

Sincerely,



Cheryl A. Tubbs
Vice President