



CLERK OF THE BOARD OF SUPERVISORS

2021 DEC 21 PM 3:14

# San Bernardino County

COUNTY OF SAN BERNARDINO CALIFORNIA

## Land Use Services Department Planning Division

385 North Arrowhead Avenue, 1<sup>st</sup> Floor • San Bernardino, CA 92415

Phone Number (909) 387-8311 • Fax Number (909) 387-3223

### NOTICE OF PREPARATION AND NOTICE OF PUBLIC SCOPING MEETING

**CLERK OF THE BOARD**

**FROM:** San Bernardino County Land Use Services Department  
385 North Arrowhead Avenue, First Floor  
San Bernardino, CA 92415-0187

**TO:** Responsible Agencies, Trustee Agencies, and Interested Parties

**DATE:** December 21, 2021

**SUBJECT:** Notice of Preparation of a Draft Environmental Impact Report for the Slover and Alder Avenue Industrial Project <sup>1</sup>

**Received on:** 12/21/2021

**Remove on:** 2/2/2022

The County of San Bernardino ("County") will be the Lead Agency and will prepare a Draft Environmental Impact Report (EIR) for the proposed Duke Warehouse at Slover and Alder Project ("Project") described below. We are interested in your agency's views as to the appropriate scope and content of the Draft EIR's environmental information pertaining to your agency's statutory responsibilities related to the project. We will need the name of a contact person for your agency. For interested individuals, we would like to be informed of environmental topics of interest to you regarding the project.

Because the County has already determined that an EIR is required for the proposed Project, and as permitted by State CEQA Guidelines Section 15060(d) (Preliminary Review), the County will not prepare an Initial Study for the Project. Further, the proposed Project, its location, and its potential environmental effects are summarized for this Notice of Preparation (NOP). A copy of the NOP with figures is available on the County's website or upon request with the project planner as detailed below. The County welcomes public input during the NOP review period

**Project Title:** Duke Warehouse at Slover and Alder Project

**Project Number:** PROJ-2021-00081

**Project Applicant:** Duke Realty Corporation

**Assessor's Parcel Number(s):** 0256-031-19, 0256-031-18, 0256-031-17, 0256-031-07, 0256-031-08, 0256-031-09, and 0256-031-10

**Project Location:** The Project site is in the unincorporated community of Bloomington, in the southwestern area of the County's Valley Region. The Project site consists of 13.23 acres located at the southeast corner of Slover Avenue and Alder Avenue. The Project site consists of two single-family residences on the northwest and southwest corner, three commercial/industrial buildings, a construction storage site, and trailer parking lot. Multiple shipping containers and other storage units are located on the northeast portion of the site. The project site is located in the Limited Industrial (LI) Land Use Category, Community Industrial (CI) Zoning District.

**Project Description:** The proposed Project would be consistent with the Policy Plan LI Land Use Designation and IC Zoning District. Approval of a Conditional Use Permit is being requested to allow for warehousing and distribution uses. The Project proposes to develop an approximately 259,481 square foot high-cube warehouse building, inclusive of 5,000 square feet of office space on approximately 13.23 acres. The proposed building would be 44 feet in height. The Project also includes the construction of a surface parking lot, landscaping, signage, and utility improvements to serve the site. In addition, offsite improvements would include curb, gutter, and sidewalk improvements along the project frontage. A total of 40 dock doors are proposed. The dock doors would be placed along the northern side of the warehouse building, along Slover Avenue and away from sensitive land uses. The parking lot would include 131 passenger vehicle stalls and 85 trailer stalls to the north and to the east of the proposed building. Construction is estimated to be completed in approximately 7 months. Operation would occur 24 hours a day, 7 days a week.

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Reference: Title 14, California Code of Regulations, California Environmental Quality Act (CEQA) Guidelines, Sections 15082(a), 15103, and 15375

NOTICE OF PREPARATION/PUBLIC SCOPING MEETING NOTICE  
PROJ-2021-00081

**Environmental Issues:** An Initial Study has not been prepared for the Project as the County has determined that an EIR will clearly be required (State CEQA Guidelines Section 15063(a)). Based on the anticipated impacts, the County anticipates that the following environmental topic areas will be addressed in the EIR: Aesthetics, Agriculture and Forestry Resources, Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, Transportation, Tribal Cultural Resources, Utilities and Service Systems, Wildfire, and Project Alternatives.

**Public Review Period:** December 22, 2021, through January 21, 2022

**Responses and Comments:** Please send your responses and comments by January 21, 2022, to Aron Liang, Senior Planner at [Aron.Liang@lus.sbcounty.gov](mailto:Aron.Liang@lus.sbcounty.gov) or at the following address:

Aron Liang, Senior Planner  
County of San Bernardino Land Use Services Department – Planning Division  
385 North Arrowhead Avenue, First Floor  
San Bernardino, CA 92415-0187

**Notice of Scoping Meeting:**

The Project is considered a project of statewide, regional, or areawide significance, and, therefore, the County will conduct a scoping meeting for the Project pursuant to State CEQA Guidelines Section 15082(c) (Notice of Preparation and Determination of Scope of EIR) for the purpose of soliciting comments of adjacent cities, responsible agencies, trustee agencies, and interested parties requesting notice as to the appropriate scope and content of the Draft EIR. The Project will have an in-person scoping meeting with details on location and time outlined below. The date and meeting details are as follows:

**Date:** Thursday January 6th, 2022  
**Time:** 6:00 PM (Pacific Standard Time)  
**Place:** Meeting via Zoom webinar  
**Link:** <https://us06web.zoom.us/j/87661949804?pwd=QlgrbnJlM0hiTXVFaFdER0oxWmVDZz09>  
**Passcode:** 303009

\*A Spanish interpreter will be provided for the Zoom meeting\*

**Document Availability: *Notice of Preparation***

This Notice of Preparation can be viewed on the County of San Bernardino website at: <http://cms.sbcounty.gov/lus/Planning/Environmental/Valley.aspx>. The documents are also available during regular business hours at:

- County of San Bernardino Land Use Services Department, Planning Division, 385 North Arrowhead Avenue, San Bernardino, CA 92415; between the hours of 8:00 a.m. and 4:30 p.m., Monday through Friday.

To request a PDF version of the document from the Land Use Services Department, please reference If you require additional information please contact Aron Liang, Senior Planner, at (909) 387-0235 or (909) 601.4672.

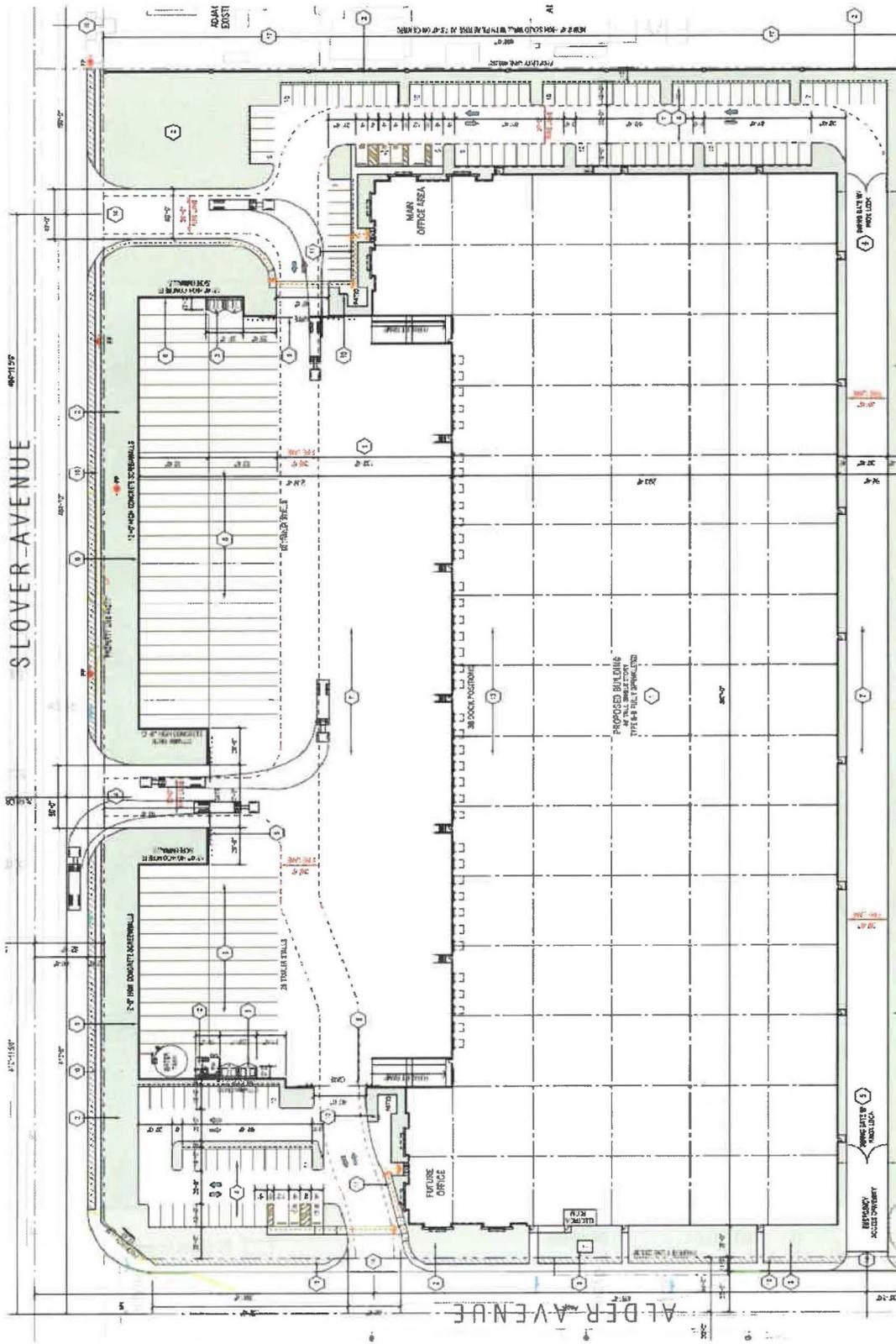
# Project Location Map



Duke Warehouse on Slover & Alder

Figure 1

# Project Site Plan



Duke Warehouse at Slover & Alder

Figure 2

# Colton Joint Unified School District

Frank Miranda, Ed.D., Superintendent  
Rick Jensen, Assistant Superintendent, Business Services Division  
Owen Chang, Director of Facilities and Energy Management



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January 21, 2022

Aron Liang, Senior Planner  
County of San Bernardino  
Land Use Services Department, Planning Division  
385 North Arrowhead Avenue, First Floor  
San Bernardino, CA 92415-0187

Via email: [Aron.Liang@lus.sbcounty.gov](mailto:Aron.Liang@lus.sbcounty.gov)

Subject: Response to Notice of Preparation of a Draft Environmental Impact Report (EIR) for Proposed Duke Warehouse at Slover and Alder Project (Project No. PROJ-2021-00081; State Clearinghouse No. 2021120526)

Dear Mr. Liang:

Thank you for continuing to engage the Colton Joint Unified School District (District) in the planning of proposed industrial uses near our schools. The proposed Duke Warehouse at Slover and Alder Project is a high cube warehouse distribution facility, located southeast of the Slover Avenue at Alder Avenue intersection in unincorporated Bloomington, San Bernardino County (Project). The District operates six schools within one mile of the Project site:

**Table 1. Colton Joint Unified School District Schools**

School	Address	Distance
1. Bloomington High School	10750 Laurel Avenue, Bloomington	340 feet to the south
2. Ruth O. Harris Middle School	11150 Alder Avenue, Bloomington	0.6 mile to the south
3. Sycamore Hills Elementary School	11036 Mahogany Drive, Fontana	0.65 mile to the southwest
4. Walter Zimmerman Elementary School	11050 Linden Avenue, Bloomington	0.85 mile to the southeast
5. Slover Mountain High School	18829 Orange Street, Bloomington	1.0 mile to the east
6. Mary B. Lewis Elementary School	18040 San Bernardino Avenue, Bloomington	1.0 mile to the north

## **1. Project Description**

The District submitted comments on the proposed Project's application on November 23, 2021; see Attachment A. Our comments focused on the proposed Project's site layout and a design that would limit potential environmental impacts and health risks. In general, we requested that the proposed high cube warehouse and dock doors face northward, that all trailer truck access occur via Slover Avenue, and that trailer trucks not be allowed on Alder Avenue,

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south of Slover Avenue. It is not clear from the Notice of Preparation whether the third request would be possible. Therefore, the District requests that the project description in the Draft EIR include the Project's proposed truck routes that would be used during the construction and operational phases, truck access in and out of the Project site, as well as details on proposed facility operations.

## **2. Cumulative Impact Analysis**

a. **Related Projects.** To properly capture cumulative traffic and air quality impacts, related projects should include past, present, and reasonably foreseeable probable future that were not in operation when traffic counts were taken. The geographic area and related projects should include those in the Bloomington community and the City of Fontana and that would access the Interstate-10 ramps at Sierra Avenue and Cedar Avenue.

## **3. Air Quality Impact Analysis and Health Risk Assessment**

- a. **Sensitive Receptors.** The project-level and cumulative analysis for air quality and health risk should assess the proposed Project's stationary emissions and mobile source emissions and how they may impact surrounding sensitive receptors, including District schools, especially Bloomington High School as it is 340 feet south of the Project site and Slover Mountain High School because it is located along the proposed Project's truck route.
- b. **Health-Protective Significance Thresholds.** The proposed Project is in a community with some of the highest pollution burden in all of California. Pollution burden represents the potential exposures to pollutants and the adverse environmental conditions caused by pollution. Warehouse developments generate a substantial amount of truck traffic and associated diesel particulate matter (DPM), which has the potential to adversely affect sensitive populations and their pollution burden, especially school-aged children, attending schools and living near these uses.

Environmental justice aims to correct the legacy of concentrating pollution and other hazards in or near low-income communities and communities of color by reducing these hazards and involving the impacted communities in any decisions that affect their environmental health. CalEnviroScreen 3.0 and the Countywide Plan identifies the Bloomington community as an environmental justice community that is disproportionately affected by and vulnerable to poor air quality. A health risk assessment conducted for the Countywide Plan Final EIR identified an incremental cancer risk at the maximally exposed individual receptor of over 263 per million from cumulative truck traffic in the Bloomington community.

The South Coast Air Quality Management District (South Coast AQMD) has also identified the Colton/Grand Terrace/San Bernardino (southwest) as an Assembly Bill 617 (AB 617) Year 2–5 community. AB 617 communities meet one or more of the following criteria: identified within the top 25 percent of CalEnviroScreen 3.0; identified within the top 25 percent of South Coast AQMD's Multiple Airborne Toxics Emissions Study (MATES) IV for cancer risk; and/or average percent of industrial land use and freeways within 1,000 feet from school/daycare boundaries was in the top 20 percent. The Bloomington community meets all three AB 617 criteria. Consequently, placement

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of additional warehouse developments, such as the proposed Project, proximate to disadvantaged communities would further exacerbate local air quality and health effects.

Due to the poor air quality in the community, the District requests that the proposed Project use health-protective significance thresholds and not the standard thresholds provided by the South Coast Air Quality Management District (SCAQMD) that are more appropriate for proposed developments not in AB 617 or environmental justice communities. Application of the health-protective thresholds presented in Table 2 would ensure that air quality impacts and cancer risks caused by the Project would be mitigated to acceptable levels. For purposes of disclosure and comparison, Table 2 also lists SCAQMD’s significance thresholds.

**Table 2. Health-Protective Significance Thresholds Compared to SCAQMD CEQA Significance Thresholds**

Pollutant	Scenario/Time Period	SCAQMD Air Quality Significance Thresholds	Health-Protective Thresholds
<b>Toxic Air Contaminants (TACs) Thresholds</b>			
DPM	Construction	Maximum Incremental Cancer Risk $\geq 10$ in 1 million	Maximum Incremental Cancer Risk $\geq 1$ in 1 million
	Operations		Maximum Incremental Cancer Risk $\geq 10$ in 1 million
<b>Ambient Air Quality Standards for Criteria Pollutants</b>			
NO <sub>2</sub>	1-hour average	0.18 ppm (state) (Equivalent to 339 $\mu\text{g}/\text{m}^3$ )	20 $\mu\text{g}/\text{m}^3$
	Annual arithmetic mean	0.03 ppm (state) (Equivalent to 56.4 $\mu\text{g}/\text{m}^3$ ) and 0.0534 ppm (federal) (Equivalent to 100 $\mu\text{g}/\text{m}^3$ )	1.0 $\mu\text{g}/\text{m}^3$
PM <sub>10</sub>	24-hour average	10.4 $\mu\text{g}/\text{m}^3$ (construction)	5.0 $\mu\text{g}/\text{m}^3$
		2.5 $\mu\text{g}/\text{m}^3$ (operation)	2.5 $\mu\text{g}/\text{m}^3$
	Annual average	1.0 $\mu\text{g}/\text{m}^3$	1.0 $\mu\text{g}/\text{m}^3$
PM <sub>2.5</sub>	24-hour average	10.4 $\mu\text{g}/\text{m}^3$ (construction)	1.2 $\mu\text{g}/\text{m}^3$
		2.5 $\mu\text{g}/\text{m}^3$ (operation)	1.2 $\mu\text{g}/\text{m}^3$
	Annual average	(no standard)	0.3 $\mu\text{g}/\text{m}^3$

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- c. **Proposed Mitigation for Project-Level and Cumulative Air Quality Impacts.** While it is possible that the proposed Project on its own may not result in significant air quality impacts (to be determined by the Project's air quality impact analysis), the proposed Project would incrementally contribute to the existing poor air quality in the Bloomington community, including at District schools, and contribute to increased health risks to residents and students.

SCAQMD Rule 2305 implements the Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program. Rule 2305 seeks to reduce nitrogen oxide and particulate matter emissions produced by light- and heavy-duty trucks and tractor trailers (mainly diesel) traveling to and from warehouses and applies to owners and operators of existing and new warehouses with at least 100,000 square feet of indoor floor space. As the Project proposes a 259,481 SF warehouse, the Project would be required to comply with SCAQMD Rule 2305.

Under SCAQMD Rule 2305, warehouse operators must earn a specific number of points (called WAIRE Points) to offset the number of truck trips to and from warehouses. The WAIRE program provides a "menu" of implementation measures for impacted businesses to earn points, which must be earned in addition to compliance with existing federal and state warehousing regulations. These measures include installing MERV 16 or greater filters or filtration systems in residences, schools, daycares, hospitals, and community centers within three miles of the warehouse in order to reduce exposure to particulate matter.

As the proposed Project would incrementally contribute to cumulative air quality degradation, the District requests the proposed Project consider contributing to the District's efforts to fund hospital-grade air purification systems at its schools, including at Bloomington High School and others listed in Table 1. The proposed Project's cumulative air quality impact analysis should consider the metrics established in SCAQMD's WAIRE program to determine appropriate mitigation for project-level and cumulative air quality impacts.

## **4. Noise**

- a. **Sensitive Receptors.** The noise analysis should identify residential uses and District schools as sensitive receptors and evaluate noise generated by increased truck traffic to and from the Project site, including Bloomington High School, which is 340 feet south of the Project site, and Slover Mountain High School, which is at the northeast corner of the Slover Avenue and Cedar Avenue intersection, along a likely truck route that would be used by the Project.
- b. **Noise and Vibration Analyses.** The proposed Project has the potential to increase ambient noise and vibration levels and adversely affect sensitive populations. The proposed Project may degrade the ambient noise environment, disrupt the learning environment, and increase adverse health effects related to high levels of noise exposure at Bloomington High School and Slover Mountain High School, which is likely along the designated truck route. The noise and vibration analysis must determine the proposed Project's direct and indirect impacts, as well as cumulative impacts on indoor and outdoor noise at Bloomington High School and Slover Mountain High School

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and mitigate the impacts accordingly.

## **5. Transportation**

- a. **Increased Traffic.** The District has concerns related to the increased vehicle and truck traffic near its schools. With existing poor levels of service near freeway ramps and major intersections along Slover Avenue, the increase in traffic has the potential to disrupt and delay drop-off and pick-up activities at schools near the Project site (e.g., Bloomington High School) and along truck routes (e.g., Slover Mountain High School). The District requests that the environmental analysis prepared for the project address these issues and identify appropriate mitigation.
- b. **Pedestrian Safety.** The increase in traffic and operations will also impact pedestrian safety near District schools. Students who walk to and from school would be required to cross intersections that trailer trucks are likely to use. Please evaluate whether the intersections of Slover/Alder, Slover/Cedar, and Slover/Sierra have adequate pedestrian safety features and whether the proposed Project would impair safe routes to the schools listed on Table 1. Please also note, students walking to Bloomington High School may be required to cross the proposed Project's driveways. Therefore, we recommend that trailer trucks not use the driveways on Alder Avenue.

The District appreciates the opportunity to submit these comments on the proposed Duke Warehouse at Slover and Alder Project. We look forward to working with the County and Applicant to ensure the Project's impacts on schools and student health and safety are adequately mitigated.

Sincerely,

A handwritten signature in black ink that reads 'Owen Chang' with a stylized flourish at the end.

Owen Chang  
Facilities & Energy Management Director

Cc: Dr. Frank Miranda, Superintendent

# Colton Joint Unified School District

Dr. Frank Miranda, Ed.D., Superintendent  
Rick Jensen, Assistant Superintendent, Business Services  
Owen Chang, Director, Facilities & Energy Management



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November 29, 2021

Aron Liang, Senior Planner  
County of San Bernardino  
Land Use Services Department, Planning Division  
385 North Arrowhead Avenue, First Floor  
San Bernardino, CA 92415-0187

Via email: [Aron.Liang@lus.sbcounty.gov](mailto:Aron.Liang@lus.sbcounty.gov)

Subject: **Response to Application for Proposed Warehouse at Southeast Corner of Slover Avenue at Alder Avenue (Project No. PROJ-2021-00081)**

Dear Mr. Liang:

Colton Joint Unified School District (CJUSD) appreciates the opportunity to provide input on the subject application for a proposed warehouse development on 13.25 acres, southeast of the Slover Avenue at Alder Avenue intersection in unincorporated Bloomington, San Bernardino County (Project).

CJUSD operates six schools within a mile of the Project site:

- Bloomington High School (10750 Laurel Avenue, Bloomington) – 340 feet to the south
- Ruth O. Harris Middle School (11150 Alder Avenue, Bloomington) – 0.6 mile to the south
- Sycamore Hills Elementary School (11036 Mahogany Drive, Fontana) – 0.65 mile to the southwest
- Walter Zimmerman Elementary School (11050 Linden Avenue, Bloomington) – 0.85 mile to the southeast
- Slover Mountain High School (18829 Orange St, Bloomington) – 1.05 mile to the east
- Mary B. Lewis Elementary School (18040 San Bernardino Ave, Bloomington) – 1.0 mile to the north

With the proliferation of industry development within its boundaries, especially in unincorporated Bloomington, CJUSD is concerned about the health effects associated with truck-related pollution. According to the California Air Resources Board (CARB), among other pollutants, diesel trucks emit nitrogen oxide (NOx)—a primary precursor to smog formation and a significant factor in the development of respiratory problems like asthma, bronchitis, and lung irritation—and diesel particulate matter (a subset of fine particulate matter that is smaller than 2.5 micrometers)—a contributor to cancer, heart disease, respiratory illnesses, and premature death.<sup>1</sup> Studies conducted by the University of Southern California (USC) at communities in South Los Angeles show that traffic-related pollution is linked to early markers for

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<sup>1</sup> California Environmental Protection Agency, California Air Resources Board. Nitrogen Dioxide & Health. Website Accessed: 2021, July 21. <https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health>

cardiovascular disease in children.<sup>1</sup> CJUSD requests the County to consider the incompatible land uses between the proposed warehouse project and adjacent sensitive land uses.

Should the County accept the proposed application, CJUSD requests that the County and Applicant consider our recommendations and comments provided herein.

**Warehouse Building Design Considerations.** Bloomington High School is 360 feet south of the proposed Project. However, residential uses exist immediately adjacent to the south of the Project site. Additionally, areas adjoining the Project site on the west and south are zoned residential. Due to the close proximity of existing sensitive land uses, the District suggests the County and Applicant implement the below design considerations included in the California Department of Justice's Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act:<sup>2</sup>

- Per CARB guidance, site warehouse facilities so that their property lines are at least 1,000 feet from the property lines of the nearest sensitive receptors.<sup>3</sup>
- Create physical, structural, and/or vegetative buffers that adequately prevent or substantially reduce pollutant dispersal between warehouses and any areas where sensitive receptors are likely to be present, such as homes, schools, daycare centers, hospitals, community centers, and parks.
- Provide adequate areas for on-site parking, on-site queuing, and truck check-in that prevent trucks and other vehicles from parking or idling on public streets.
- Place facility entry and exit points from the public street away from sensitive receptors, e.g., place these points on the north side of the facility if sensitive receptors are adjacent to the south side of the facility.
- Locate warehouse dock doors and other onsite areas with significant truck traffic and noise away from sensitive receptors, e.g., placing these dock doors on the north side of the facility if sensitive receptors are adjacent to the south side of the facility.
- Screen dock doors and onsite areas with significant truck traffic with physical, structural, and/or vegetative barriers that adequately prevent or substantially reduce pollutant dispersal from the facility towards sensitive receptors.
- Post signs clearly showing the designated entry and exit points from the public street for trucks and service vehicles.
- Post signs indicating that all parking and maintenance of trucks must be conducted within designated on-site areas and not within the surrounding community or public streets.

Based on the above recommendations, the District requests the County and Applicant consider the below project-specific features, which may reduce potentially significant pollutant dispersion to sensitive land uses south of the Project site:

1. Locate warehouse dock doors on the north side of the property, facing Slover Avenue.
2. Locate truck trailer parking on the north side of the property, along Slover Avenue.
3. Designate truck trailer driveways on Slover Avenue. Consider ingress-only from the eastern end of the property on Slove and egress-only from the western end of the property, either on Slover Avenue or Alder Avenue. If on Alder Avenue, trucks must be required to turn right only.
4. Locate warehouse building(s) along the southern side of the property so it may act as a physical barrier between

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<sup>1</sup> University of Southern California. Traffic-Related Pollution Linked to Early Markers for Cardiovascular Disease in Children. 2021, April 29. <https://news.usc.edu/185647/auto-emissions-pollution-children-cardiovascular-disease-usc-research/>

<sup>2</sup> California Department of Justice. Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act <https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/warehouse-best-practices.pdf>

<sup>3</sup> California Air Resources Board (CARB), Air Quality and Land Use Handbook: A Community Health Perspective (April 2005), at ES-1. CARB staff has released draft updates to this siting and design guidance which suggests a greater distance may be warranted under varying scenarios; this document may be found on CARB's website and is entitled: "California Sustainable Freight Initiative: Concept Paper for the Freight Handbook" (December 2019).

truck trail operations and sensitive uses to the south of the property.

5. Install a sound wall—with no gaps—on the south side of the property to further reduce hazardous noise and air emissions and impacts.

**Proposed Project Operations.** Due to the adjacency of residential uses and Bloomington High School, the District requests that the County consider prohibiting Project operation of transport refrigeration units (TRUs) since they are powered by diesel internal combustion engines, which are a large particulate matter emissions source.

**Incompatible Land Uses.** Land uses south of the Project site include rural residential, limited commercial, and two schools: Bloomington High School and Ruth O. Harris Middle School. Since the proposed Project would not be consistent with CARB's guidance to provide a minimum 1,000-foot buffer between warehouse facilities and the nearest sensitive receptors, the District requests that the County restrict all truck trailer access south of the Project site during construction and operation phases. All trucks should access the Project site from Slover Avenue and be restricted to travel south on Alder Avenue, which is the western boundary of the Project site and that dead ends at the foothill of Jurupa Hills Regional Park. This would limit not only diesel emissions dispersed to sensitive land uses south of the Project site, but also potential conflicts between vehicles and pedestrians at Bloomington High School and Harris Middle School.

**Conclusion.** CJUSD appreciates the opportunity to submit these comments on the Project. We look forward to contributing more to the County's planning process to ensure proposed developments are planned with school impacts and student health in mind and that environmental impacts and public health risks are fully mitigated.

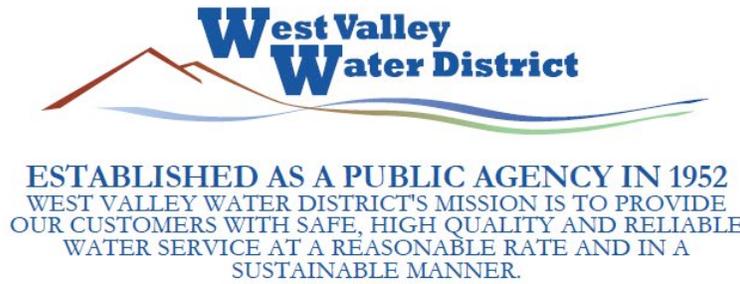
Sincerely,



Owen Chang  
Facilities & Energy Management Director

Cc: Dr. Frank Miranda, Superintendent  
File

Channing Hawkins  
*President, Board of Directors*  
 Dr. Michael Taylor  
*Vice President, Board of Directors*  
 Greg Young  
*Director*  
 Angela Garcia  
*Director*  
 Vacant - Division 3  
*Director*



Shamindra K. Manbahal  
*General Manager*  
 Van M. Jew  
*Assistant General Manager  
 Operations & Engineering*  
 Peggy Asche  
*Board Secretary*

January 26, 2022

Aron Liang  
 Senior Planner  
 SB County – Land Use Services Department  
 385 N. Arrowhead Ave, First Floor  
 San Bernardino, CA 92415

**Subject: Draft EIR for the Duke Warehouse at Slover and Alder**

Dear Mr. Liang,

Thank you for the opportunity to review the subject project. We offer the following comments on behalf of the West Valley Water District (WVWD):

1. The Development is within the WVWD service area and does have active water services currently serving the parcels. The applicant will be required to apply for and submit a plan check for the abandonment of the existing services and installation of all new water services associated with the development of the parcels.
2. The Development is in the District's Zone 3 pressure zone and will be required to perform a hydraulic analysis to determine if the existing water facilities are sufficient or if additional upgrades are necessary to service the project.
3. All water improvements proposed for installation must be installed by one of the District's preapproved contractors. All development fees and deposits must be paid prior to construction of any off-site water facilities.
4. Should the Development require an on-site fire pump, the District will require a break tank to be installed.
5. All plan check requirements, applications and the schedule of fees can be found on the District's Engineering web page.

Should you or the applicant have any questions, please do not hesitate to contact me at (909) 875-1804 ext 373.

Sincerely,

**WEST VALLEY WATER DISTRICT**

Daniel Guerra  
 Engineering Development Coordinator

SENT VIA E-MAIL:

January 11, 2022

[Aron.Liang@lus.sbcounty.gov](mailto:Aron.Liang@lus.sbcounty.gov)

Aron Liang, Senior Planner  
County of San Bernardino, Land Use Services Department  
385 North Arrowhead Avenue, First Floor  
San Bernardino, California 92415

**Notice of Preparation of a Draft Environmental Impact Report for the  
Slover and Alder Avenue Industrial Project (Proposed Project)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. Our comments are recommendations on the analysis of potential air quality impacts from the Proposed Project that should be included in the Draft Environmental Impact Report (EIR). Please send a copy of the Draft EIR upon its completion and public release directly to South Coast AQMD as copies of the Draft EIR submitted to the State Clearinghouse are not forwarded. **In addition, please send all appendices and technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all emission calculation spreadsheets, and air quality modeling and health risk assessment input and output files (not PDF files). Any delays in providing all supporting documentation for our review will require additional review time beyond the end of the comment period.**

**CEQA Air Quality Analysis**

Staff recommends that the Lead Agency use South Coast AQMD's CEQA Air Quality Handbook and website<sup>1</sup> as guidance when preparing the air quality and greenhouse gas analyses. It is also recommended that the Lead Agency use the CalEEMod<sup>2</sup> land use emissions software, which can estimate pollutant emissions from typical land use development and is the only software model maintained by the California Air Pollution Control Officers Association.

South Coast AQMD has developed both regional and localized significance thresholds. South Coast AQMD staff recommends that the Lead Agency quantify criteria pollutant emissions and compare the emissions to South Coast AQMD's CEQA regional pollutant emissions significance thresholds<sup>3</sup> and localized significance thresholds (LSTs)<sup>4</sup> to determine the Proposed Project's air quality impacts. The localized analysis can be conducted by either using the LST screening tables or performing dispersion modeling.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road

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<sup>1</sup> South Coast AQMD's CEQA Handbook and other resources for preparing air quality analyses can be found at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>.

<sup>2</sup> CalEEMod is available free of charge at: [www.caleemod.com](http://www.caleemod.com).

<sup>3</sup> South Coast AQMD's CEQA regional pollutant emissions significance thresholds can be found at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>.

<sup>4</sup> South Coast AQMD's guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips, and hauling trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers and air pollution control devices), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, emissions from the overlapping construction and operational activities should be combined and compared to South Coast AQMD's regional air quality CEQA *operational* thresholds to determine the level of significance.

If the Proposed Project generates diesel emissions from long-term construction or attracts diesel-fueled vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment<sup>5</sup>.

In the event that implementation of the Proposed Project requires a permit from South Coast AQMD, South Coast AQMD should be identified as a Responsible Agency for the Proposed Project in the Draft EIR. The assumptions in the air quality analysis in the EIR will be the basis for evaluating the permit under CEQA and imposing permit conditions and limits. Questions on permits should be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

The California Air Resources Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective*<sup>6</sup> is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process with additional guidance on strategies to reduce air pollution exposure near high-volume roadways available in CARB's technical advisory<sup>7</sup>.

South Coast AQMD staff is concerned about potential public health impacts of siting warehouses within close proximity of sensitive land uses, especially in communities that are already heavily affected by the existing warehouse and truck activities. The South Coast AQMD's Multiple Air Toxics Exposure Study (MATES V), completed in August 2021, concluded that the largest contributor to cancer risk from air pollution is diesel particulate matter (DPM) emissions<sup>8</sup>. According to the MATES V Carcinogenic Risk interactive Map, the area surrounding the Proposed Project has an estimated cancer risk over 472 in one million<sup>9</sup>. Operation of warehouses generates and attracts heavy-duty diesel-fueled trucks that emit DPM. When the health impacts from the Proposed Project are added to those existing impacts, residents living in the communities surrounding the Proposed Project will possibly face an even greater exposure to air pollution and bear a disproportionate burden of increasing health risks.

### **Mitigation Measures**

In the event that the Proposed Project results in significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize these impacts. Any impacts resulting from mitigation measures must also be analyzed. Several resources to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project include South Coast AQMD's CEQA Air Quality Handbook<sup>1</sup>, South Coast AQMD's Mitigation Monitoring and

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<sup>5</sup> South Coast AQMD's guidance for performing a mobile source health risk assessment can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

<sup>6</sup> CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* can be found at: <http://www.arb.ca.gov/ch/handbook.pdf>.

<sup>7</sup> CARB's technical advisory can be found at: <https://www.arb.ca.gov/ch/landuse.htm>.

<sup>8</sup> South Coast AQMD. August 2021. *Multiple Air Toxics Exposure Study in the South Coast Air Basin V*. Available at: <http://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v>.

<sup>9</sup> South Coast AQMD. MATES V Data Visualization Tool. Accessed at: [MATES Data Visualization \(arcgis.com\)](https://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v).

Reporting Plan for the 2016 Air Quality Management Plan<sup>10</sup>, and Southern California Association of Government's Mitigation Monitoring and Reporting Plan for the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy<sup>11</sup>.

Mitigation measures for operational air quality impacts from mobile sources that the Lead Agency should consider in the Draft EIR may include the following:

- Require zero-emissions (ZE) or near-zero emission (NZE) on-road haul trucks such as heavy-duty trucks with natural gas engines that meet the CARB's adopted optional NOx emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr), if and when feasible. Given the state's clean truck rules and regulations aiming to accelerate the utilization and market penetration of ZE and NZE trucks such as the Advanced Clean Trucks Rule<sup>12</sup> and the Heavy-Duty Low NOx Omnibus Regulation<sup>13</sup>, ZE and NZE trucks will become increasingly more available to use. The Lead Agency should require a phase-in schedule to incentive the use of these cleaner operating trucks to reduce any significant adverse air quality impacts. South Coast AQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency. At a minimum, require the use of 2010 model year<sup>14</sup> that meet CARB's 2010 engine emissions standards at 0.01 g/bhp-hr of particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks. Include environmental analyses to evaluate and identify sufficient electricity and supportive infrastructures in the Energy and Utilities and Service Systems Sections in the CEQA document, where appropriate. Include the requirement in applicable bid documents, purchase orders, and contracts. Operators shall maintain records of all trucks associated with project construction to document that each truck used meets these emission standards, and make the records available for inspection. The Lead Agency should conduct regular inspections to the maximum extent feasible to ensure compliance.
- Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the Final CEQA document. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the Proposed Project through CEQA prior to allowing this higher activity level.
- Provide electric vehicle (EV) charging stations or at a minimum, provide the electrical infrastructure and electrical panels should be appropriately sized. Electrical hookups should be provided for truckers to plug in any onboard auxiliary equipment.

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<sup>10</sup> South Coast AQMD's 2016 Air Quality Management Plan can be found at: <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf> (starting on page 86).

<sup>11</sup> Southern California Association of Governments' 2020-2045 RTP/SCS can be found at:

[https://www.connectsocal.org/Documents/PEIR/certified/Exhibit-A\\_ConnectSoCal\\_PEIR.pdf](https://www.connectsocal.org/Documents/PEIR/certified/Exhibit-A_ConnectSoCal_PEIR.pdf).

<sup>12</sup> CARB. June 25, 2020. *Advanced Clean Trucks Rule*. Accessed at: <https://ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks>.

<sup>13</sup> CARB has recently passed a variety of new regulations that require new, cleaner heavy-duty truck technology to be sold and used in state. For example, on August 27, 2020, CARB approved the Heavy-Duty Low NOx Omnibus Regulation, which will require all trucks to meet the adopted emission standard of 0.05 g/hp-hr starting with engine model year 2024. Accessed at: <https://ww2.arb.ca.gov/rulemaking/2020/hdomnibuslownox>.

<sup>14</sup> CARB adopted the statewide Truck and Bus Regulation in 2010. The Regulation requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent. More information on the CARB's Truck and Bus Regulation is available at: <https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm>.

Mitigation measures for operational air quality impacts from other area sources that the Lead Agency should consider in the Draft EIR may include the following:

- Maximize use of solar energy by installing solar energy arrays.
- Use light colored paving and roofing materials.
- Utilize only Energy Star heating, cooling, and lighting devices, and appliances.
- Use of water-based or low VOC cleaning products that go beyond the requirements of South Coast AQMD Rule 1113.

Design considerations for the Proposed Project that the Lead Agency should consider to further reduce air quality and health risk impacts include the following:

- Clearly mark truck routes with trailblazer signs, so that trucks will not travel next to or near sensitive land uses (e.g., residences, schools, day care centers, etc.).
- Design the Proposed Project such that truck entrances and exits are not facing sensitive receptors and trucks will not travel past sensitive land uses to enter or leave the Proposed Project site.
- Design the Proposed Project such that any check-in point for trucks is inside the Proposed Project site to ensure that there are no trucks queuing outside.
- Design the Proposed Project to ensure that truck traffic inside the Proposed Project site is as far away as feasible from sensitive receptors.
- Restrict overnight truck parking in sensitive land uses by providing overnight truck parking inside the Proposed Project site.

On May 7, 2021, South Coast AQMD's Governing Board adopted Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program, and Rule 316 – Fees for Rule 2305. Rules 2305 and 316 are new rules that will reduce regional and local emissions of nitrogen oxides (NO<sub>x</sub>) and particulate matter (PM), including diesel PM. These emission reductions will reduce public health impacts for communities located near warehouses from mobile sources that are associated with warehouse activities. Also, the emission reductions will help the region attain federal and state ambient air quality standards. Rule 2305 applies to owners and operators of warehouses greater than or equal to 100,000 square feet. Under Rule 2305, operators are subject to an annual WAIRE Points Compliance Obligation that is calculated based on the annual number of truck trips to the warehouse. WAIRE Points can be earned by implementing actions in a prescribed menu in Rule 2305, implementing a site-specific custom plan, or paying a mitigation fee. Warehouse owners are only required to submit limited information reports, but they can opt in to earn Points on behalf of their tenants if they so choose because certain actions to reduce emissions may be better achieved at the warehouse development phase, for instance the installation of solar and charging infrastructure. Rule 316 is a companion fee rule for Rule 2305 to allow South Coast AQMD to recover costs associated with Rule 2305 compliance activities. Since the Proposed Project consists of the development of a 259,481-square-foot warehouse, the Proposed Project's warehouse owners and operators will be required to comply with Rule 2305 once the warehouse is occupied. Therefore, South Coast AQMD staff recommends that the Lead Agency review South Coast AQMD Rule 2305 to determine the potential WAIRE Points Compliance Obligation for future operators and explore whether additional project requirements and CEQA mitigation measures can be identified and implemented at the Proposed Project that may help future warehouse operators meet their compliance obligation<sup>15</sup>. South Coast AQMD staff is available to answer questions concerning Rule 2305 implementation and compliance by phone or email at (909) 396-3140 or [waire-program@aqmd.gov](mailto:waire-program@aqmd.gov). For

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<sup>15</sup> South Coast AQMD Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xxiii/r2305.pdf>.

implementation guidance documents and compliance and reporting tools, please visit South Coast AQMD's WAIRE Program webpage<sup>16</sup>.

South Coast AQMD staff is available to work with the Lead Agency to ensure that air quality, greenhouse gas, and health risk impacts from the Proposed Project are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at [lsun@aqmd.gov](mailto:lsun@aqmd.gov).

Sincerely,

*Lijin Sun*

Lijin Sun

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

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<sup>16</sup> South Coast AQMD WAIRE Program. Accessed at: <http://www.aqmd.gov/waire>.

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Good Morning,

Thank you for providing the California Department of Transportation (Caltrans) the opportunity to review and comment on the Notice of Preparation of a Draft Environmental Impact Report (DEIR) for the Duke Warehouse @ Slover & Alder (Project), located southeast corner of Slover Avenue and Alder Avenue in the Bloomington Community, in the County of San Bernardino. The project proposes to develop an approximately 259,481 square foot high-cube warehouse building, inclusive of 5,000 square feet of office space on approximately 13.23 acres (APNs#: 0256-031-19, 0256-031-18, 0256-031-17, 0256-031-07, 0256-031-08, 0256-031-09, and 0256-031-1).

As the owner and operator of the State Highway System (SHS), it is our responsibility to coordinate and consult with local jurisdictions when a proposed development may impact our facilities. As the responsible agency under the California Environmental Quality Act, it is also our responsibility to make recommendations to offset associated impacts with the proposed project. Although the project is under the jurisdiction of the County of San Bernardino, due to the project's potential impact to the State facilities, including Interstate 10, it is also subject to the policies and regulations that govern the SHS.

In the preceding DEIR, we recommend a Traffic Impact Analysis (TIA) be prepared to accurately evaluate the extent of potential impacts of the project to the operational characteristics of the existing State facilities by the project area. We recommend the TIA be submitted prior to the circulation of the DEIR to ensure timely review of the submitted materials to address any potential issues. We offer the following comments:

- 1) Provide a Traffic Impact Analysis for our review. The Traffic Impact Analysis shall be prepared in accordance to the local jurisdiction's Traffic Impact Study guidelines and the Highway Capacity Manual (HCM).
- 2) Provide traffic safety reviews as a stand-alone report for proposed land use projects and plans affecting the State Highway System.
- 3) Perform the appropriate VMT-focused Traffic Impact Study and submit for review. The identified VMT category will be evaluated based on the VMT-Focused Traffic Impact Study.

Caltrans is committed to providing a safe transportation system for all users. We encourage the County to embark a safe, sustainable, integrated and efficient transportation system and complete street to enhance California's economy and livability. A pedestrian/bike-friendly environment served by multimodal transportation would reduce traffic congestion prevalent in the surrounding areas.

- 4) Design the local streets to serve vehicular and pedestrian circulation equally, and for safe pedestrian friendly environment. Consider both Americans with Disability Act and California Highway Design Manual standards and requirements to provide transportation routes for all users and modes, including pedestrian and bicyclists. Provide a continuous multi-modal circulation system allowing current/future residents, employees, and guests to access the attraction places.
- 5) Relegate the parking spaces to the back of the buildings and locate preferential parking for vanpools and carpools, along with, secure, visible, and convenient bicycle parking/racks accessible to retail and office locations. Consider installing electric vehicle charging stations, and locate parking space for low-emitting, fuel-efficient, alternative-fueled vehicle visitor parking in commercial and office uses.

These recommendations are preliminary and summarize our review of materials provided for our evaluation. If you have any questions regarding this email, please contact me.

Thanks,

**JACOB K. MASKEW**

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