

# BLOOMINGTON INDUSTRIAL FACILITY FINAL ENVIRONMENTAL IMPACT REPORT

State Clearinghouse No. 2016031085



*Lead Agency:*  
**San Bernardino County Land Use Services Department**  
385 North Arrowhead Avenue, First Floor  
San Bernardino, CA 92415-0187  
*Contact: Kevin White*

**Michael Baker**  
INTERNATIONAL

*Prepared by:*  
**Michael Baker International**  
3536 Concourse, Suite 100  
Ontario, CA 91764  
*Contact: Christine Donoghue*

**March 2017**



## Table of Contents

<b>1.1</b>	<b>INTRODUCTION</b> .....	<b>1.0-1</b>
<b>1.2</b>	<b>ORGANIZATION OF THE FINAL EIR</b> .....	<b>1.0-1</b>
<b>1.3</b>	<b>CEQA PROCESS SUMMARY</b> .....	<b>1.0-1</b>
<b>1.4</b>	<b>CHANGES TO THE DRAFT EIR</b> .....	<b>1.0-2</b>
<b>2.1</b>	<b>INTRODUCTION TO COMMENTS AND RESPONSES</b> .....	<b>2.0-1</b>
	<b>Comment Letter: Colton Joint Unified School District (SCHOOL DIST)</b> .....	2.0-2
	Response to Comment Letter: Colton Joint Unified School District (SCHOOL DIST).....	2.0-6
	<b>Comment Letter: San Bernardino County Department of Public Works (PUBLIC WORKS)</b> ...	2.0-13
	Response to Comment Letter: San Bernardino County Department of Public Works (PUBLIC WORKS).....	2.0-15
	<b>Comment Letter: South Coast Air Quality Management District (AQMD)</b> .....	2.0-17
	Response to Comment Letter: South Coast Air Quality Management District (AQMD)..	2.0-21
	<b>Comment Letter: San Manuel Band of Mission Indians (SAN MANUEL)</b> .....	2.0-28
	Response to Comment Letter: San Manuel Band of Mission Indians (SAN MANUEL).....	2.0-30
	<b>Comment Letter: Laborers International Union of North America (UNION)</b> .....	2.0-31
	Response to Comment Letter: Laborers International Union of North America (UNION) .....	2.0-32
	<b>Comment Letter: Golden State Environmental Justice Alliance (JUSTICE ALLIANCE)</b> .....	2.0-33
	Response to Comment Letter: Golden State Environmental Justice Alliance (JUSTICE ALLIANCE) .....	2.0-47
	<b>Comment Letter: Cruz Baca Sembelo (SEMBELLO)</b> .....	2.0-62
	Response to Comment Letter: Cruz Baca Sembelo (SEMBELLO) .....	2.0-63
	<b>Comment Letter: Various (FORM)</b> .....	2.0-65
	Response to Comment Letter: Various (FORM) .....	2.0-80
<b>3.1</b>	<b>Introduction to the Errata</b> .....	<b>3.0-1</b>
<b>3.2</b>	<b>Changes to the Draft EIR</b> .....	<b>3.0-1</b>
	Section 3.0 Project Description .....	3.0-1
	Section 4.5 Land Use.....	3.0-6
	<b>Attachment A</b> .....	<b>A-1</b>
	<b>Appendix B</b> .....	<b>B-1</b>

### List of Tables

Table 2.0-1	Comments from Public Agencies, Organizations and Individuals.....	2.0-1
-------------	---	-------

### List of Exhibits

Exhibit 3.0-7, Existing Parcels.....	3.0-4
Exhibit 3.0-8, Tentative Parcel Map.....	3.0-5

This page intentionally left blank.



## 1.1 INTRODUCTION

The Final Environmental Impact Report (Final EIR) for the Bloomington Industrial Facility Project (Project) has been prepared in accordance with the California Environmental Quality Act (CEQA) (California Public Resources Code § 21000 et seq.), and the CEQA Guidelines (14 California Code of Regulations, Division 6, Chapter 3). CEQA Guidelines Section 15132 indicates that the contents of a Final EIR shall consist of:

- The Draft EIR or a revision of the Draft EIR;
- Comments and recommendations received on the Draft EIR either verbatim or in summary;
- A list of persons, organizations, and public agencies commenting on the Draft EIR;
- The responses of the Lead Agency to significant environmental points raised in the review and consultation process; and
- Any other information added by the Lead Agency.

The Draft EIR, and the Final EIR, along with public comments, will be considered by the County of San Bernardino Board of Supervisors in determining whether to certify the Final EIR and approve the Project.

## 1.2 ORGANIZATION OF THE FINAL EIR

This Final EIR provides the requisite information required under CEQA and is organized as follows:

- **Section 1.0 Introduction.** This section provides an introduction to the Final EIR, including the requirements under CEQA, the organization of the document, as well as brief summary of the CEQA process activities to date.
- **Section 2.0 Comments and Responses.** This section provides a list of public agencies, organizations, and individuals commenting on the Draft EIR, provides a copy of each written comment received, and any response required under CEQA.
- **Section 3.0 Errata to the Draft EIR.** This section details changes to the Draft EIR.
- **Appendix.** This section provides additional content where needed and cross-references from the body of the Final EIR.

## 1.3 CEQA PROCESS SUMMARY

Pursuant to CEQA, the discussion of potential effects on the environment is focused on those impacts that the lead agency determined could be potentially significant. On March 24, 2016, the County issued a Notice of Preparation (NOP)/Initial Study (IS) (Draft EIR, Appendix A) to inform agencies and the general public that an IS was being prepared and invite comments on the scope and content of the document and participation at a public scoping meeting held April 13, 2016. The NOP was distributed to State and Local agencies, responsible and trustee agencies, interested parties and organizations. The NOP public review

period was from March 24, 2016 through April 22, 2016, consistent with the CEQA-required 30 day comment period.

The Draft EIR includes an in-depth evaluation of seven environmental resource areas and other CEQA-mandated issues (e.g., cumulative impacts, growth-inducing impacts, alternatives, impacts that are less than significant, etc.). The seven environmental issue areas upon which the EIR focuses include are Air Quality; Cultural Resources; Greenhouse Gas Emissions; Hazards and Hazardous Materials; Land Use; Noise; and Transportation and Circulation.

The County released the Draft EIR to the public on December 23, 2016, for a 45-day review ending on February 6, 2017. During the public review period, the Project was available for review on the County's website at:

- [http://www.sbcounty.gov/Uploads/lus/Environmental/westernrealco/Draft\\_EIR.pdf](http://www.sbcounty.gov/Uploads/lus/Environmental/westernrealco/Draft_EIR.pdf)
- <http://www.sbcounty.gov/Uploads/lus/Environmental/westernrealco/Appendices.pdf>

In addition, hard copies were available at the County Land Use Services Department, Planning Division at 385 North Arrowhead Avenue, San Bernardino, CA 92415; and at the Bloomington Branch Library at 18028 Valley Boulevard, Bloomington, CA 92316. See Attachment A for the Notice of Availability.

Comments received on the Draft EIR and the subsequent Errata have been incorporated into the Final EIR document. The Draft EIR, Final EIR, and public comments will be considered by the Board in determining whether to certify the Final EIR and approve the Project.

## 1.4 CHANGES TO THE DRAFT EIR

Section 3.0 *Errata to the Draft EIR* details the changes to the Draft EIR. The changes to the Draft EIR represent minor modifications and clarifications to the existing content.

CEQA Guidelines Section 15088.5 describes when an EIR requires recirculation prior to certification, stating in relevant part:

- (a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term "information" can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement...
- (b) Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.

The changes to the Draft EIR described herein clarify or make insignificant changes to an adequate EIR, and are not significant new information as defined by CEQA Guidelines Section 15088.5. Therefore, this Final EIR is not subject to recirculation prior to certification.

# Section 2.0 Comments and Responses

## 2.1 INTRODUCTION TO COMMENTS AND RESPONSES

Table 2.0-1 below provides a list of those parties that provided written comments on the Draft EIR during the public review period. Each comment document has been assigned a brief description as indicated in the table.

A copy of each document providing written comments is provided in this section, and each comment has been annotated with the assigned letter along with a number for each comment. Each comment document is followed by a written response which corresponds to the comments provided.

**Table 2.0-1 Comments from Public Agencies, Organizations and Individuals**

Assignment	Organization/Name	
<b>Agencies</b>		
SCHOOL DIST	Colton Joint Unified School District	January 30, 2017
PUBLIC WORKS	San Bernardino County Department of Public Works	February 1, 2017
AQMD	South Coast Air Quality Management District	February 3, 2017
<b>Organizations</b>		
SAN MANUEL	San Manuel Band of Mission Indians	January 26, 2017
UNION	Laborers International Union of North America	February 2, 2017
JUSTICE ALLIANCE	Golden State Environmental Justice Alliance	February 5, 2017
<b>Individuals</b>		
SEMBELLO	Cruz Baca Sembello	February 6, 2017
FORM	Various Residents (15 Individuals) <ul style="list-style-type: none"> <li>▪ Isael Flores;</li> <li>▪ Alejandro Martinez;</li> <li>▪ Martine Villasenor;</li> <li>▪ Michell Vega;</li> <li>▪ Ricardo Garcia;</li> <li>▪ Manuel Muro;</li> <li>▪ Dorthy Cheryl Gardner;</li> <li>▪ Juan Garcia;</li> <li>▪ Sal Romero;</li> <li>▪ Howard Baker;</li> <li>▪ Jen McNeil;</li> <li>▪ Cynthia Floriano;</li> <li>▪ Louetta Gosney;</li> <li>▪ Salvador Sanchez; and</li> <li>▪ Leonard J. Harris.</li> </ul>	February 1, 2017

**COMMENT LETTER: COLTON JOINT UNIFIED SCHOOL DISTRICT (SCHOOL DIST)**

Comment Letter: SCHOOL DIST

**Colton Joint Unified School District**

Jerry Almendarez, Superintendent  
 Dr. Frank Miranda, Assistant Superintendent, Business Services Division  
 Owen Chang, Director, Facilities, Planning & Construction



**BOARD OF EDUCATION**

- Mr. Dan Flores, *President*
- Mr. Frank A. Ibarra, *Vice-President*
- Mrs. Joanne E. Thoring-Ojeda, *Clerk*
- Mr. Randall Cenicerros
- Mrs. Patt Haro
- Mr. Pilar Tabera
- Mr. Kent Taylor

January 30, 2017

Kevin White, Senior Planner  
 County of San Bernardino  
 Land Use Services Department-Planning Division  
 385 North Arrowhead Avenue, 1<sup>st</sup> Floor  
 San Bernardino, CA 92415-0187

**Re: Bloomington Industrial Facility EIR, SCH # 2016031085**

Dear Mr. White:

Colton Joint Unified School District (CJUSD) is interested in the above-referenced project due to its proximity to two CJUSD elementary schools: Walter Zimmerman Elementary School is located at 11050 Linden Avenue, to the immediate northwest of the Project site, and Crestmore Elementary School is located at 18870 Jurupa Avenue, approximately 750 feet east of the project site. CJUSD also owns an adjacent vacant lot which may be utilized for a future school site.

For the reasons stated herein, in addition to various legal and technical deficiencies within the EIR, CJUSD strongly urges the County to deny this project due to its incompatibility with the surrounding school and residential uses, and the unacceptable health and safety risks to students at these two elementary schools.

**1. The EIR's Measurement of Distance From School Sites is Inconsistent.**

Different measures of distance from the project site are given for Walter Zimmerman and Crestmore Elementary Schools within the EIR. The following inconsistencies necessarily affect the analysis of risk from toxic air contaminants, noise, vibration, etc. and must be corrected, for example:

- **Page 4.4-10:** Walter Zimmerman Elementary School is located approximately 70 feet northwest across Linden Avenue and Crestmore Elementary School is located approximately 750 feet east.
- **Page 4.6-6:** Walter Zimmerman Elementary is located 260 feet to the northwest and Crestmore Elementary is located 860 feet to the east.

**2. The Project is Inconsistent with the Bloomington Community Plan.**

As stated on page 4.5-9 of the EIR, the project would be inconsistent with several objectives of the community plan:

1212 Valencia Drive, Colton, CA 92324-1798 – (909) 580-5000



“The Project site is close to a park, elementary school and residential uses. Due to truck traffic and operations hours, it is not considered a compatible land use with residential, institutional [school], and park uses. Truck trips associated with the proposed Project would create traffic, noise, and air quality impacts that could impact the surrounding land uses. The design features include buffers, setbacks, and landscaping. Proposed landscaping, water quality features, and fences provide both physical and visual buffers around the project perimeter. While these design features minimize impacts to surrounding land uses, they do not fully resolve this inconsistency.” (Emphasis added).

cont'd  
4

Page 4.5-10 goes on to state: “...environmental nuisances would include emissions associated with trucks, which are not considered compatible with residential uses.” Certainly, diesel emissions from trucks are not consistent with school uses either, which make this a highly inappropriate location for a 676,983 square foot distribution facility.

**3. Mitigation Measures to Reduce Construction Noise Impacts to Schools Are Inadequate.**

As acknowledged by the EIR on page 4.6-4, “[noise] can also disrupt effective communication between teachers and pupils in schools”. Walter Zimmerman Elementary School is located 260 feet to the northwest and Crestmore Elementary is located 750-860 feet to the east of the project site. Based on the close proximity to these schools and the construction noise modeling results contained in EIR Table 4.6-9, project construction will likely exceed the County’s interior and exterior noise standards that are applicable to school environments, causing disruption to classroom instruction and outdoor activities.

Compliance with the County’s limitations on hours of construction will not render construction noise impacts to less than significant. Under the line of cases discussed in *Keep Our Mountains Quiet v. County of Santa Clara* (2015) 236 Cal.App.4th 714, compliance with a local noise ordinance is not necessarily dispositive of whether a project’s noise impacts are significant. Particularly in this case, the EIR and proposed mitigation measures do not adequately address noise impacts that will be unique to the nearby schools. For example, Mitigation Measure NOI-1(5) limits hours of construction to between 7:00 a.m. and 7:00 p.m., which will allow construction to occur during the entire school day when school is in session.

5

The EIR should be revised to include meaningful noise mitigation measures, such as temporary construction noise barriers, or greater efforts to coordinate completion of the loudest construction activities when school is not in session. Noise modeling should be conducted for each school property to demonstrate the efficacy of any such proposed mitigation measures. If noise levels will not be reduced to acceptable levels throughout the duration of construction, the EIR should be revised to acknowledge that construction noise impacts to the nearby schools (in addition to the nearby residents) will be significant and unavoidable.

**4. Construction Air Quality Impacts to Schools Have Not Been Adequately Analyzed.**

The project site is approximately 34.5 acres in size, and the EIR states that grading will occur on up to 3.5 acres per day during the grading phase of the project. The EIR’s discussion of construction air quality impacts is somewhat misleading, as page 4.1-23 states:

“Construction projects contained in a site of less than 5 acres are generally considered to represent less than significant health risk impacts due to (1) limitations on the off-road diesel equipment able to operate and thus a reduced amount of generated diesel PM, (2) the reduced amount of dust-generating ground disturbance possible compared to larger construction sites, and (3) the reduced duration of construction activities compared to the development of larger sites.”

6

While this would be relevant if the total project site acreage were less than 5 acres, it is not—it is more than six times that size.

**5. The EIR’s Analysis of Cumulative Health Risks from Toxic Air Contaminants is Inadequate.**

7

1212 Valencia Drive, Colton, CA 92324-1798 – (909) 580-5000



The EIR's analysis of health risks from exposure to operational diesel particulate matter also fails to acknowledge existing exposure to toxic air contaminants in the project vicinity. The project will add increased cancer risk to the maximally exposed receptors and school sites, in addition to the existing, ambient cancer risk that is already several orders of magnitude higher than 10 in 1 million. Specifically, the Health Risk Analysis states that based on local air monitoring, the current excess cancer risk in the project area is **427 in one million**—this represents the “baseline” health risk for purposes of cumulative analysis.

The EIR should acknowledge this existing, cumulatively significant impact due to the overall poor air quality in the region and the increased diesel emissions due to the recent proliferation of warehouse and distribution uses in the Inland Empire. However, the EIR makes no mention of the existing cancer risk attributable to toxic air contaminants (namely, diesel particulate matter) in the region, and therefore fails to identify this as an existing, cumulatively significant impact. Without properly framing the additional cancer risk attributable to the project's truck trips in the context of the already extremely elevated cancer risk in the region, the EIR fails as an informational document. Although the Health Risk Analysis does refer to the existing, cumulatively significant excess cancer risk (427 in one million), this was not reflected in the EIR's analysis and discussion of this impact. A report buried in an appendix is not a substitute for a good-faith, reasoned analysis in the EIR itself. (*California Oak Foundation v. City of Santa Clarita* (2005) 133 Cal. App. 4th 1219, 1239, citing to *Santa Clarita Organization for Planning the Environment v. County of Los Angeles* (2003) 106 Cal.App.4th 715, 722-723).

cont'd  
7

#### **6. The EIR Fails to Address Potential Vehicular (Truck)/Pedestrian Conflicts.**

The project would generate approximately 1,490 daily vehicle trips in passenger car equivalents, 102 of which would occur during the morning peak hour and 108 of which would occur during the evening peak hour. The existing residential development currently generates a total of approximately 114 daily vehicle trips, 9 of which occur during the morning peak hour and 12 of which will occur during the evening peak hour. Therefore, the Project would result in a net increase of 1,375 daily trips, with 93 occurring in the morning peak hour, and 96 occurring in the evening peak hour. (EIR at 4.7-15 to 4.7-16). Heavy trucks will account for the majority of this increased traffic.

The evening peak hour (4:00 p.m. to 6:00 p.m.) does not reflect the increased traffic surrounding the elementary schools, which are dismissed at 1:55 p.m. (and at 12:30 p.m. every Wednesday, which is a minimum day).

8

The EIR also fails to include any discussion of the safety of school children who may be walking to and from school in the vicinity of such heavy truck traffic. The EIR's only mention of crosswalks is as follows:

“The intersections of Linden Avenue/Jurupa Avenue and Cedar Avenue/Jurupa Avenue within the Study Area provide marked pedestrian crosswalks; however, there are no posted signs prohibiting pedestrian crossings at unmarked pedestrian crossing intersections Oak Street/Jurupa Avenue and Stallion Lane/Linden Avenue.” (EIR at 4.7-6 to 4.7-7).

The project, if approved, should be required to provide meaningful mitigation to prevent conflicts between students and trucks. This may include funding for permanent, dedicated crossing guards at locations determined in consultation with CJUSD, or additional crosswalk improvements with appropriate signage and illumination.

#### **7. The EIR Fails to Provide an Adequate Range of Alternatives.**

The EIR analyzes two alternatives in addition to the mandatory No Project Alternative: 1) a Reduced Intensity Alternative, and 2) a Commercial Use Alternative. Neither of these alternatives would alleviate the fundamental inconsistencies between industrial/commercial uses and residential/school uses, and neither would serve to reduce the significant and unavoidable impacts that would occur under the project. In addition, the “No Project” alternative

9

evaluated under the EIR actually assumes residential development on the site (30 dwelling units) consistent with the existing land use and zoning designations, rather than assuming that the site would remain vacant.

Evaluating what could potentially occur under the existing land use designations would more properly be analyzed under an "Existing Zoning Alternative". In addition, a higher-density residential development (which would likely be more financially feasible) should also be analyzed as a potential alternative, in order to allow the decision makers to make a meaningful comparison between potential development scenarios.

In closing, the proposed project is not suitable for this location given the proximity to schools and residences. As stated in the EIR itself, all of the mitigation measures and design considerations are not enough to resolve the fundamental land use incompatibilities that would result from the project being constructed in this location. At a minimum, if the project is allowed to move forward, the applicant should be required to provide effective mitigation to reduce construction noise impacts and to ensure pedestrian/crosswalk safety. The EIR should also be recirculated to address the existing cumulative toxic air contaminant impact in the project area, and to include analysis of additional alternatives, as described above.

cont'd  
9

10

Sincerely,



Owen Chang  
Director, Facilities Planning & Construction



---

## **RESPONSE TO COMMENT LETTER: COLTON JOINT UNIFIED SCHOOL DISTRICT (SCHOOL DIST)**

### **Response to Comment SCHOOL DIST 1.**

The County appreciates and values the comments of the Colton Joint Unified School District (School District) offered during the EIR participation process. These comments provide general introductory and background information regarding the proximity and location of two existing schools, Walter Zimmerman Elementary School (Zimmerman Elementary) and Crestmore Elementary School (Crestmore Elementary), as well as an adjacent vacant lot which may be utilized for a future school site by the School District. Responses to specific comments are provided below; no further response is required.

### **Response to Comment SCHOOL DIST 2.**

The commenter notes its opposition to the Project due to the School District's belief that the Project is incompatible with the surrounding school and residential uses and health and safety risks. Responses to specific comments are provided below; no further response is required.

### **Response to Comment SCHOOL DIST 3.**

The commenter states that it believes the Draft EIR is inconsistent with the stated distances between the locations of both Zimmerman Elementary and Crestmore Elementary to the Project site, as referenced on pages 4.4-10 and 4.6-6 of the Draft EIR. Distance values will vary depending on whether the measurement is between features, structures, property lines, or activities. On page 4.4-10, the Draft EIR acknowledges that Zimmerman Elementary is located approximately 70 feet northwest across Linden Avenue, and Crestmore Elementary is located approximately 750 feet east of the Project site. These reference distances between property lines in order to provide a disclosure of the closest possible distances between the Project and surrounding uses. The references on page 4.6-6 provide the approximate distance between the nearest classrooms and the Project site for purposes of analyzing noise impacts. This methodology is appropriate because children are more sensitive to noise disturbances during class and not while on lunch break. Accordingly, this is why distances vary between the analyses on Draft EIR, pages 4.4-10 and 4.6-6. Ultimately, all noise and vibrations from Project construction were found to be less than significant and, would be temporary in nature. County of San Bernardino Municipal Code, Section 83.01.080, Section (g)(3) states that "Temporary construction, maintenance, repair, or demolition activities between 7:00 a.m. and 7:00 p.m., except Sundays and Federal holidays" are exempt. Temporary construction is anticipated to occur over a duration of approximately 10 months, commencing in the first half of 2017 and the facility would be operational in 2018, such that construction noise and vibration are not likely to affect the experience of school children playing on the playgrounds because: 1) according to the Colton Joint Unified School District 2016-2017 School Calendars, all elementary and high schools will be on summer break from June 6 – August 5, 2017 which would reduce any noise impacts to adjacent schools by two of the ten months of projected construction duration; 2) the implementation of Mitigation Measure NOI-2 would help mitigate any potentially significant noise impact to less than significant; and 3) Table 4.6-10 *Noise from On-Site Activities* shows that noise activities from the Project operations would not exceed the San Bernardino County Noise Ordinance Standard of 45 dBA for sensitive land uses near

the Project site. Specifically, the predicted noise level from onsite noise activities at the nearest school (Walter Zimmerman Elementary School) would be approximately 38 dBA, which is well below existing ambient noise levels, as well as the applicable noise ordinance standard. At the more distant Crestmore Elementary, operational noise levels would be substantially lower. As shown in Table 4.6-11 Project-Related Traffic Noise, noise from the additional project-related vehicle trips adjacent to Walter Zimmerman Elementary School would result in an increase of less than 1 decibel. Similarly, project-related vehicle trips on Jurupa Avenue east of the project (where Crestmore Elementary is located) would also result in an increase of less than 1 decibel, which is not an audible increase. Vibration from construction and operation of the project were assessed and determined to be less than significant in Section 5.5 of the project's Noise and Vibration Technical Report. Therefore, all noise and vibration impacts of the Project's operations were found to be less than significant. Response to Comment SCHOOL DIST 4.

The comment indicates that the Project is inconsistent with the Bloomington Community Plan for various reasons, which are stated and fully disclosed on pages 4.5-9 and 4.5-10 of the Draft EIR. Otherwise, this comment is duly noted. The County of San Bernardino General Plan 2007 Noise Element, Policy N 1.7 states that incompatible land uses shall be prevented, by reason of excessive noise levels, from occurring in the future. However, all construction and operational noise impacts would be mitigated to a less than significant impact with implementation of Mitigation Measure NOI-1. No excessive noise levels would occur. Additionally, NOI-1 applies to construction related noise impacts which tend to be the loudest, but also only temporary. All operational noise levels are projected to be less than significant; thus, incompatibility based on noise levels is not applicable. The comment also cites Draft EIR p. 4.5-10 indicating that environmental nuisances would include emissions associated with trucks, which are not considered compatible with residential uses. The context for this statement is consistency with Community Plan policy BL/LU 3.3, which focusses on compatibility between residential and industrial use, and does not address schools. We agree that from a general standpoint truck emissions would be similarly incompatible with schools. However, with respect to the Project, the results of the project-specific health risk analysis indicate that impacts would be less than significant at the nearby school, and at residences which are closer.

#### **Response to Comment SCHOOL DIST 5.**

This comment refers to Table 4.6-9 (page 4.6-24 of the Draft EIR noise section), which provides estimates of construction noise levels by construction phase for the nearest noise-sensitive land uses. The nearest noise-sensitive land uses are existing residences located as near as 60 feet to the west of the Project site boundary. The referenced schools are not the nearest noise-sensitive land uses since Zimmerman Elementary is located 260 feet to the northwest and Crestmore Elementary is located 750-780 feet to the east<sup>1</sup>.

Noise levels generated by a "point source" such as construction equipment diminish at a rate of approximately 6 decibels per doubling of distance from the source (Dudek 2016b). At a distance of 260

---

<sup>1</sup> Approximate distances from Project boundary to school classrooms.

feet, construction noise levels at Zimmerman Elementary would be approximately 13 decibels lower than those shown in Table 4.6-9 at the residences located 60 feet from the Project site. Therefore, the construction noise levels at Zimmerman Elementary would range from approximately 60 dBA  $L_{eq}$  to 71 dBA  $L_{eq}$ , even without implementation of the recommended mitigation measures listed in NOI-1. Assuming a conservative level of exterior-to-interior mitigation, for structures of modern construction, with doors and windows closed<sup>2</sup>, the resulting interior noise level in the classrooms would be approximately 40 to 51 dBA  $L_{eq}$ , which would not exceed the County stationary noise standard for Professional Services<sup>3</sup> of 55 dBA  $L_{eq}$ . Please note that these estimates are without mitigation measures provided in NOI-1. Effectiveness of these mitigation measures would vary from several decibels (which in general is a relatively small change) to ten or more decibels (which subjectively would be perceived as a substantial change), depending upon the specific equipment and the original condition of that equipment, the specific locations of the noise sources and the receivers, etc. Relocation of equipment to a more distant location, for example, could range from 1 decibel or less to over 15 decibels, depending upon the location of the equipment before and after relocation. Installation of more effective silencers could range from several decibels to well over 10 decibels. Reduction of idling equipment could reduce overall noise levels from barely any reduction to several decibels. Cumulatively, however, these measures would result in substantial decreases in the noise from construction. Furthermore, the commenter does not identify what noise level it would find acceptable, nor does the commenter provide substantial evidence identifying why the EIR's significance conclusion is incorrect.

At the next-nearest school, Crestmore Elementary, located 750-780 feet to the east of the Project site, noise levels would be approximately 22 decibels lower than those shown in Table 4.6-9 at the residences located 60 feet from the Project site. Therefore, the construction noise levels at Crestmore Elementary would range from approximately 51 dBA  $L_{eq}$  to 62 dBA  $L_{eq}$ , without the recommended mitigation measures. Assuming a conservative level of exterior-to-interior mitigation, for structures of modern construction, with doors and windows closed, the resulting interior noise level in the classrooms would be approximately 31 to 42 dBA  $L_{eq}$ , which would not exceed the County stationary noise standard for Professional Services of 55 dBA  $L_{eq}$ . Ultimately, because noise impacts are already less than significant with the application of existing mitigation, no further measures are required by CEQA. (State CEQA Guidelines, § 15126.4(a)(3).)

#### **Response to Comment SCHOOL DIST 6.**

The comment relates concerns regarding construction air quality impacts. As stated on page 4.1-17 of the Draft EIR, Localized Significance Thresholds (LSTs) were developed in response to the South Coast Air Quality Management District (SCAQMD) Governing Boards' Environmental Justice Enhancement Initiative (I-4). The SCAQMD provided the Final Localized Significance Threshold Methodology (dated June 2003 [revised 2009]) for guidance. The LST methodology assists lead agencies in analyzing localized air quality

---

<sup>2</sup> Federal Highway Administration. 2011. Highway Traffic Noise: Analysis and Abatement Guidance. FHWA-HEP-10-025. December 2011.

<sup>3</sup> Table 83-2, County Code of Ordinances. The County does not provide a specific listing for schools, but professional service type uses would require a similar level of concentration and comprehension.

impacts. The LST methodology acknowledges that construction activities occur throughout a project site and are concentrated at the point closest to the sensitive receptors. Table 4.1-8 of the Draft EIR identifies how SCAQMD guidance is used to determine the maximum daily disturbed acreage within 25 meters of a sensitive receptor for comparison to LSTs. (According to the SCAQMD, projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters.) The SCAQMD produced look-up tables for projects that disturb areas less than or equal to 5 acres in size daily. That is why it is important to note, as shown in Table 4.1-8 of the Draft EIR, that Project construction would be anticipated to disturb a maximum of 3.5 acres within 25 meters of a sensitive receptor in a single day, as determined by SCAQMD guidance. Since Project construction would disturb a maximum of 3.5 acres in a single day within 25 meters of a sensitive receptor, the use of the SCAQMD LST methodology, which includes the use of look-up tables for projects that disturb areas less than or equal to 5 acres in size daily, is appropriate.

#### **Response to Comment SCHOOL DIST 7.**

The commenter is incorrect in suggesting that the Draft EIR fails to acknowledge existing exposure of toxic air contaminants in the Project vicinity. The Draft EIR does include a disclosure of background concentrations of diesel particulate matter and potential associated cancer risk. Indeed, the commenter actually cites to the very Draft EIR appendix that provides that information. As stated in the Health Risk Assessment (Draft EIR, Appendix B), of the Draft EIR, the SCAQMD has conducted an in-depth analysis of the toxic air contaminants and their resulting health risks for all of Southern California, and as a result has been able to estimate an excess cancer risk of 427 in one million in the Project region. Diesel particulate matter accounts for 68 percent of the total risk shown in the *Multiple Air Toxics Exposure Study in the South Coast Air Basin, MATES IV* (2015). This study, shows that cancer risk has decreased 68 percent between MATES III (2008) and MATES IV (2015), even though the state's population has increased 31 percent and the amount of vehicle miles traveled has increased 81 percent over this time. (Draft EIR pp. 4.1-26 through 4.1-27.)

A health risk assessment (HRA) was prepared for the Project in order to analyze potential health risks resulting from Project-generated diesel particulate matter. The HRA was based on the procedures developed by the California Office of Environmental Health Hazard Assessment (OEHHA) and the SCAQMD to meet the mandates of the Air Toxics "Hot Spots" Information and Assessment Act (AB 2588). The OEHHA procedures describe the toxicity factors associated with various substances, how these toxicity factors are to be used to determine the acute, chronic, and cancer risks associated with downwind concentrations of chemicals in the air at various receptors, and dispersion modeling procedures. Due to the highly technical components of the Project HRA, it is organized in the Draft EIR as an appendix and cited in Section 4.1 in full.

The Draft EIR applies a threshold of a maximum individual cancer risk of 10 in 1 million for evaluating whether the Project may cause a significant increase in potential cancer risk consistent with the mandates of the SCAQMD and the Air Toxics "Hot Spots" Information and Assessment Act. The SCAQMD has established an incidence rate of 10 persons per 1 million as the maximum acceptable incremental cancer

risk due to diesel particulate matter exposure. This threshold serves to determine whether or not a given project has a potentially significant development-specific and cumulative impact. The 10 in one million standard is a very health-protective significance threshold. A risk level of 10 in one million implies a likelihood that up to 10 persons, out of one million equally exposed people would contract cancer if exposed continuously (24 hours per day) to the levels of toxic air contaminants over a specified duration of time. This risk would be an excess cancer risk that is in addition to any cancer risk borne by a person not exposed to these air toxics. To put this risk in perspective, the risk of accidental drowning is 1,000 in a million, which is 100 times more than the SCAQMD's threshold of 10 in one million.

Finally, the commenter seem to suggest that *any* increase in incremental cancer risk equates to a significant cumulative impact. CEQA case law has rejected that argument finding that “the ‘one [additional] molecule rule’ is not the law.” (*Communities For a Better Environment v. California Resources Agency* (202) 103 Cal. App. 4th 98, 120.)

#### **Response to Comment SCHOOL DIST 8.**

The commenter is quoting the total number of trips in Passenger Car Equivalents and assuming they are all trucks. This is not the case. The bulk of those peak hour trips are employee or other non-truck vehicles. Based on the Project specific Traffic Impact Analysis (Draft EIR, Appendix F), the Project is anticipated to add approximately 17 trucks during the morning and evening peak hours.

Of those 17 trucks, approximately 12 would pass by the school complex containing Bloomington Head Start, Bloomington Junior High School, and Slover Mountain High School at the intersection of Cedar Avenue and Slover Avenue. The projected 12 new trucks at those intersections will increase the future projected traffic by 0.40 percent during the morning peak hour and 0.39 percent during the evening peak hour. This increase in truck traffic is unnoticeable on the roadway network. This amount of increased traffic is far less than the daily fluctuation of traffic.

Of those 17 trucks, it is not foreseeable that any trucks would pass by Zimmerman Elementary or Crestmore Elementary. See Exhibits 4.7-2 Inbound Truck Trip Distribution, and 4.7-3 Outbound Truck Distribution in the Draft EIR, which illustrate anticipated truck traffic to and from the project site, and does not show any percentage of truck traffic being distributed on Jurupa Avenue east of Cedar Avenue where Crestmore Elementary is located.

In response to the comment regarding the traffic impact analysis conducted, according to Kunzman Associates, Inc., a traffic impact analysis typically evaluates a period for a typical weekday (Tuesday, Wednesday, or Thursday) during peak hours, in this case from 7:00 a.m. to 9:00 a.m. and from 4:00 p.m. to 6:00 p.m.; see page 4 of the County of San Bernardino Traffic Impact Analysis Guidelines. Typically, if there is no impact anticipated during the morning and evening peak periods, there will not be an impact outside of those peak periods. This traffic impact analysis has analyzed the appropriate day and time periods based on traffic engineering practices and discussions with the County Public Works Department. School arrival and departure times may be the peak traffic at a school but it is not the peak traffic on the

County roadways. The peak traffic times on the County roadways is directly tied to people driving from home to work and from work to home. All other peak periods are significantly less intense.

The commenter noted concerns between trucks and pedestrians. Based on the Bloomington Industrial Facility Traffic Impact Analysis (Draft EIR, Appendix F), the Project is anticipated to add approximately 17 trucks during the morning and evening peak hours, which represents a minor overall increase in truck traffic. As indicated in the Truck Distribution exhibits (Exhibits 4.7-2 and 4.7-3 of the Draft EIR), truck traffic would utilize the Cedar Avenue and Jurupa Avenue intersection. This intersection is fully signalized and supported by crosswalks to serve vehicle use and pedestrian crossing. Project truck traffic would not be distributed further east on Jurupa Avenue, and would not use Jurupa Avenue east of the project frontage, and would not use Linden Avenue. As a result, conflicts between trucks and pedestrians are not anticipated.

The proposed Project is not proposing to modify the County Truck Routes. Based on the Bloomington Industrial Facility Truck Circulation Analysis, there are no projected truck circulation issues.

#### **Response to Comment SCHOOL DIST 9.**

The comment indicates that development under the existing land use designation should be analyzed under an Existing Zoning Alternative, and that a higher-density residential development should also be analyzed.

As indicated in the Draft EIR (see page 8.0-1), the No Project Alternative must discuss the existing conditions and what would reasonably be expected to occur in the foreseeable future if the Project would not occur. (State CEQA Guidelines, § 15126.6(e) (2).) As a result, the No Project Alternative included in the Draft EIR, evaluates the development of the site consistent with the existing land use designation/zoning, and thus is equivalent to the suggested Existing Zoning Alternative. This is an appropriate approach to application of the No Project Alternative under CEQA, regardless of the particular title attributed to the Alternative.

The suggested higher-density residential development alternative would not meet many of the basic project objectives, including: **Objective 1** in that an alternative would not create revenue-generating uses, stimulate employment, or respond to current market opportunities; **Objective 6** in that such an alternative would not facilitate goods movement for the benefit of local and regional economic growth; and **Objective 8** in that this alternative would not provide permanent employment opportunities or improve the local balance of housing and jobs.

CEQA also requires the evaluation of a reasonable range of alternatives that would reduce significant impact associated with the Project. The Draft EIR evaluated an alternative similar to the proposed Project, but at a reduced intensity of development, and therefore, with less Project-related traffic, air emissions, and noise. In addition, the Draft EIR evaluated a use that would remain commercial in nature (similar to the proposed Project), but would be more compatible with the existing residential uses. Thus, the Draft EIR evaluates residential use consistent with the General Plan, industrial use at a reduced intensity


compared to the Project, and a commercial use project, demonstrating a good faith effort in the evaluation of a reasonable range of alternatives.

**Response to Comment SCHOOL DIST 10.**

This comment serves as the conclusion to the letter. This comment provides general information and reiterates concerns previously stated. Responses to specific comments are provided above; no further response is required.

COMMENT LETTER: SAN BERNARDINO COUNTY DEPARTMENT OF PUBLIC WORKS (PUBLIC WORKS)

825 East Third Street, San Bernardino, CA 92415-0835 | Phone: 909.387.8109 Fax: 909.387.7876  
[www.SBCounty.gov](http://www.SBCounty.gov)



**Department of Public Works**

- Flood Control
- Operations
- Solid Waste Management
- Surveyor
- Transportation

Gerry Newcombe  
Director

Comment Letter: PUBLIC WORKS

February 1, 2017

County of San Bernardino  
 Land Use Service Department – Planning Division  
 Kevin White, Senior Planner  
 385 N. Arrowhead Avenue, First Floor  
 San Bernardino, CA. 92415-0187  
[kwhite@lUSD.sbcounty.gov](mailto:kwhite@lUSD.sbcounty.gov)

File: 10(ENV)-4.01

RE: NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE BLOOMINGTON INDUSTRIAL FACILITY FOR THE COUNTY OF SAN BERNARDINO LAND USE SERVICES DEPARTMENT

Dear Mr. White,

Thank you for allowing the San Bernardino County Department of Public Works the opportunity to comment on the above-referenced project. We received this request on December 22, 2016 and pursuant to our review, the following comments are provided:

General Comment

1. The project is subject to the Comprehensive Storm Drain Plan No. 3-4, dated September 1997. Any revisions to the drainage should be reviewed and approved by the County of San Bernardino Department of Public Works. If you have any questions, please contact David Lovell in the Flood Control Planning Division at 909-387-8120.
2. Any work affecting the County Maintained Road System right-of-way would need a Transportation Permit. For further information, please contact Melissa Walker in the Permits/Operations Support Division at 909-387-7995.

Environmental Management Division (Patrick Egle, Planner III, 909-387-8109):

On page 2.0.2, 2<sup>nd</sup> paragraph, the DEIR states, "The existing San Bernardino County Flood Control District (SBCFCD) parcels are linear parcels that bifurcate the middle of the Project site. These parcels are intended to support future flood control improvements associated with a railroad drainage master plan, to accept/convey drainage from the rail use to the north. This alignment would be abandoned in favor of one which would direct future flows east along the northern Project boundary and south along Cedar Avenue. The Project would dedicate the easement to SBCFCD to facilitate future drainage improvements."

**BOARD OF SUPERVISORS**

ROBERT A. LOVINGOOD Vice Chairman, First District	JANICE RUTHERFORD Second District	JAMES RAMOS Chairman, Third District	CURT HAGMAN Fourth District	JOSIE GONZALES Fifth District	GREGORY C. DEVEREAUX Chief Executive Officer
--	--------------------------------------	---	--------------------------------	----------------------------------	---



K. White, County San Bernardino Planning  
NOA Draft EIR Bloomington Industrial Facility  
February 1, 2017  
Page 2 of 2

The SBCFCD often conveys flows from new drainages, however, any impacts to water quality or increase in flows can cause sensitive habitats to grow. In this case, the SBCFCD would be required to mitigate impacts to these habitats which are often extremely expensive. As such, any increase in water flow and the effects therein need to be discussed and analyzed in the Final EIR.

The new location of the flows should be reviewed by the County of San Bernardino Department of Public Works Flood Control Planning Division to ensure it meets the District's current and future needs.

cont'd  
3

We respectfully request to be included on the circulation list for all project notices and reviews. In closing, I would like to thank you again for allowing the San Bernardino County Department of Public Works the opportunity to comment on the above-referenced project. Should you have any questions or need additional clarification, please contact the individuals who provided the specific comment, as listed above.

Sincerely,

  
**Michael R. Perry**  
Supervising Planner  
Environmental Management

---

## **RESPONSE TO COMMENT LETTER: SAN BERNARDINO COUNTY DEPARTMENT OF PUBLIC WORKS (PUBLIC WORKS)**

### **Response to Comment PUBLIC WORKS 1.**

The comment indicates that the Project is subject to the Comprehensive Storm Drain Plan No. 3-4, dated September 1997. Similarly, that any revisions to the drainage should be reviewed and approved by the County Department of Public Works. The County acknowledges that the Project is subject to the aforementioned review and approval process. This comment does not identify a specific concern with the adequacy of the Draft EIR or raise an issue or comment specifically related to the Draft EIR's environmental analysis. Therefore, no further response is warranted. (State CEQA Guidelines §15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)

### **Response to Comment PUBLIC WORKS 2.**

The comment indicates that any work affecting the County Maintained Road System right-of-way would need a Transportation Permit. The County acknowledges that any Project-related work done to County roadway system is subject to the aforementioned permit, including modification of the median on Cedar Avenue, north of Jurupa Avenue to facilitate truck movement across Cedar Avenue at the Project's northernmost driveway, and half width street improvements along Project frontage on Cedar, Jurupa, and Linden Avenues (Draft EIR p. 3.0-14). This comment does not identify a specific concern with the adequacy of the Draft EIR or raise an issue or comment specifically related to the Draft EIR's environmental analysis. Therefore, no further response is warranted. (State CEQA Guidelines §15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)

### **Response to Comment PUBLIC WORKS 3.**

The comment indicates that any impacts to water quality or increase in flows can cause sensitive habitats to grow. In such case, the San Bernardino County Flood Control District (SBCFCD) would be required to mitigate impacts to these habitats which mitigation measures are often extremely expensive. As such, any increase in water flow and the effects therein need to be discussed and analyzed in the Final EIR. Section 6.0 *Effects Not Found to be Significant* (EFNTBS) of the Draft EIR, Hydrology and Water Quality section, provides a full discussion on hydrology and water quality related impacts. Additionally, it fully addresses the stated concern regarding any increase in water flow that could occur due to the implementation of the Project. As discussed in the EFNTBS, according to the Water Quality Management Plan, the Project would collect stormwater from impervious areas and direct it to infiltration basins to both filter and recharge stormwater (Thienes Engineering 2015). Additionally, the Project runoff would mimic predevelopment conditions in terms of rate/concentration of runoff. In addition, the Project would not have an increase in water volume or its quality compared to the existing conditions, such that there will not be any increase in flows as mentioned by the commenter. Thus, the Project would not alter or exceed the capacity of existing or planned storm water drainage systems, and would not be expected to

contribute to the growing of sensitive habitats. Finally, the commenter will be added to the County's notice and distribution list for the Project going forward, as requested by the commenter.

**COMMENT LETTER: SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (AQMD)**

Comment Letter: AQMD

SENT VIA USPS AND E-MAIL:

February 3, 2017

[kwhite@lusd.sbcounty.gov](mailto:kwhite@lusd.sbcounty.gov)

Kevin White, Senior Planner  
County of San Bernardino – Land Use Services – Planning Division  
385 North Arrowhead Ave., First Floor  
San Bernardino, CA 92415

**Draft Environmental Impact Report (Draft EIR) for the Proposed  
Bloomington Industrial Facility**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the lead agency and should be incorporated into the Final EIR.

The lead agency proposes the construction and operation of a 678,983 square foot (sf) high-cube warehouse on an approximately 34.5 acre site. The Draft EIR estimates approximately 232 daily diesel truck trips and 1,137 total daily vehicle trips. In the Air Quality Section, the lead agency quantified the project's construction and operation air quality impacts and has compared those impacts with the SCAQMD's recommended regional and localized daily significance thresholds. The lead agency determined that localized and regional daily construction and operation emissions are less than significant.

The lead agency also conducted a Health Risk Assessment (HRA) to determine the long-term air quality impacts from vehicles operating at the proposed project. The HRA found that maximum cancer risk from the project is 4.92 in one million, which is less than the SCAQMD significance threshold of 10 in one million. The SCAQMD staff has concerns about the assumptions used in the modeling, which likely underestimates the health risks. Details are included in the attachment.

Pursuant to Public Resources Code Section 21092.5, SCAQMD staff requests that the lead agency provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Jack Cheng, Air Quality Specialist, CEQA Section, at (909) 396-2448, if you have any questions regarding the enclosed comments.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.  
Planning & Rules Manager  
Planning, Rule Development & Area Sources

JW:LS:JC  
SBC161227-04  
Control Number

ATTACHMENT

**Air Quality Analysis**

- 1. Since the project includes demolition, the lead agency must comply with SCAQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities. Please provide additional information regarding compliance with SCAQMD Rule 1403 in the Final EIR.

3

**Daily Truck Trip Rate**

- 2. SCAQMD staff recommends the lead agency limit the daily number of trucks allowed at the facility to levels analyzed in the Final EIR. If higher daily truck volumes are anticipated to visit the site, the lead agency should commit to re-evaluating the project through CEQA prior to allowing this land use or higher activity level.

4

**Health Risk Assessment (HRA) Analyses**

- 3. The SCAQMD staff is concerned that the HRA has potentially underestimated the cancer risk from the proposed project. In the HRA, the lead agency used the AERMOD dispersion model to estimate DPM concentrations from the diesel vehicles generated by the proposed project and used the 2015 revised OEHHA guidelines to estimate the health risks to both residents and schools in the project vicinity. SCAQMD staff recommends the lead agency revise the HRA based on the following comments:

5a

- a. The lead agency used the Terrain Height Option “Non-Default Regulatory Option – Flat” in AERMOD. SCAQMD staff recommends that the lead agency revise the Health Risk Assessment (HRA) using the Regulatory Default Option “Elevated” or provide additional justification for the use of “Non-Default Regulatory Option.” The use of National Elevation Dataset (NED) 1 arc-second or DEM 7.5 minute terrain data is recommended if using the “Elevated” setting.

- b. The lead agency used meteorological data from the SCAQMD’s San Bernardino station, which is located approximately 8.11 miles away from the Project site, while the SCAQMD’s Fontana and Rubidoux meteorological station are located approximately 6.5 and 3.5 miles away, respectively, from the project site. SCAQMD staff recommends that the lead agency revise the air quality modeling using a meteorological station that is more representative of the area and provide justification for its usage.

5b

- c. The HRA analysis involved the use of a 100-meter spacing receptor grid over the existing residences and schools. However, as modeled, the receptor grid may miss potential peak concentration locations along the property boundaries. SCAQMD staff recommends that the lead agency revise the model and start the grid at the property boundaries to ensure potential maximum concentrations are identified.

5c

- d. Some of the receptors were placed within the volume source exclusion zone and their results would be invalid. Since there are modeled volume sources which extend beyond the Project boundary, care should be taken to ensure that no receptors are placed within the volume source exclusion zone.

5d



- e. On-site and off-site truck movement sources were modeled using separated line 2W volume sources instead of adjacent line volume sources. SCAQMD staff recommends revising the HRA in the Final EIR using adjacent line volume sources and following the U.S. EPA’s haul road methodology when modeling the on-site and off-site truck movement.
- f. Line volume source SLINE – (On-Site Circulation) and SLINE2 (Off-Site Travel) were modeled with a release height of 8.37 feet, which is low for the exhaust stack of diesel trucks. The lead agency should provide a rationale to justify their assumption.
- g. On-site idling sources were modeled as elevated Area Sources (Initial Vertical Dimension = 3.01 m). SCAQMD staff recommends that the lead agency revise the HRA using a line volume that spans the entire docking area or provide rationale to justify the modeling assumption.
- h. The Transportation and Circulation report indicates that 70% of truck trips will travel north along Cedar Ave. The remaining 30% of truck trips will travel south along Cedar Ave. The HRA and dispersion modeling does not account for southbound truck traffic emissions. SCAQMD staff recommends including a southbound emissions source in the revised HRA.
- i. DPM emissions were calculated based on EMFAC2014 PM2.5 exhaust emissions. SCAQMD staff recommends using EMFAC2014 PM10 exhaust emissions since PM10 exhaust emissions are more conservative.
- j. In the HRA, the lead agency averaged the DPM emissions for the 30-years of exposure and used that emission rate to estimate health risks. This is not an appropriate methodology to estimate emissions using the 2015 revised OEHHA guidelines. The 2015 revised OEHHA guidelines acknowledge that children are more susceptible to the exposure to air toxics and have revised the way cancer risks are estimated to take this into account. Since the emissions from the project generated trucks get cleaner with time due to existing regulations, it would not be appropriate to average out the emissions over the 30-year exposure duration since this would underestimate the health risks to children who would be exposed to higher DPM concentrations during the early years of project operation. Therefore, SCAQMD staff recommends that the DPM emissions for each year of operation be applied to each of the corresponding age bins (i.e. emissions from Year 1 of project operation should be used to estimate cancer risks to the third trimester to 0 year age bin; Year 1 and 2 of project operation should be used to estimate the cancer risks to the 0 to 2 years age bins; and so on).

5e

5f

5g

5h

5i

5j

**Potential Mitigation Measures**

- 4. CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate these impacts. Pursuant to CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. In the event that the project generates significant adverse air quality impacts, information on mitigation measures as guidance to the lead agency are available on the SCAQMD CEQA Air Quality Handbook website:  
<http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>

6

Additional potential mitigation measures for the lead agency to consider may include the followings:

- a. Require the use of 2010 compliant diesel trucks, or alternatively fueled, delivery trucks (e.g., food, retail and vendor supply delivery trucks) at commercial/retail sites upon project build-out. If this isn't feasible, consider other measures such as incentives, phase-in schedules for clean trucks, etc.
- b. Have truck routes clearly marked with trailblazer signs, so that trucks will not enter residential areas.
- c. Limit activities to the amounts analyzed in the Draft CEQA document.
- d. Promote clean truck incentive programs (see the discussion above regarding Cleaner Operating Truck Incentive Programs), and
- e. Provide electric vehicle (EV) Charging Stations (see the discussion below regarding EV charging stations).
- f. Should the proposed project generate significant regional emissions, the lead Agency should require mitigation that requires accelerated phase-in for non-diesel powered trucks. For example, natural gas trucks, including Class 8 HHD trucks, are commercially available today. Natural gas trucks can provide a substantial reduction in health risks, and may be more financially feasible today due to reduced fuel costs compared to diesel. In the Final CEQA document, the lead Agency should require a phase-in schedule for these cleaner operating trucks to reduce project impacts. SCAQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the lead Agency and project applicant.
- g. Trucks that can operate at least partially on electricity have the ability to substantially reduce the significant NOx impacts from this project. Further, trucks that run at least partially on electricity are projected to become available during the life of the project as discussed in the 2012 Regional Transportation Plan. It is important to make this electrical infrastructure available when the project is built so that it is ready when this technology becomes commercially available. The cost of installing electrical charging equipment onsite is significantly cheaper if completed when the project is built compared to retrofitting an existing building. Therefore, the SCAQMD staff recommends the lead Agency require the proposed warehouse and other plan areas that allow truck parking to be constructed with the appropriate infrastructure to facilitate sufficient electric charging for trucks to plug-in. Similar to the City of Los Angeles requirements for all new projects, the SCAQMD staff recommends that the lead Agency require at least 5% of all vehicle parking spaces (including for trucks) include EV charging stations.<sup>1</sup> Further, electrical hookups should be provided at the onsite truck stop for truckers to plug in any onboard auxiliary equipment. At a minimum, electrical panels should appropriately sized to allow for future expanded use.

cont'd  
6

<sup>1</sup> [http://ladbs.org/LADBSWeb/LADBS\\_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf](http://ladbs.org/LADBSWeb/LADBS_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf)

---

## **RESPONSE TO COMMENT LETTER: SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (AQMD)**

### **Response to Comment AQMD 1.**

The commenter provides general introductory and background information regarding the Project. The County appreciates and values these comments during the EIR participation process. Responses to specific comments are provided below; no further response is required.

### **Response to Comment AQMD 2.**

The commenter briefly voices concerns regarding the assumptions used in the Air Quality Analysis modeling, asserting that the Project related health risks were likely underestimated. Responses to this issue are provided below as part of the responses to other specific comments made by the commenter. Additionally, the commenter indicates that, pursuant to Public Resources Code Section 21092.5, SCAQMD staff requests that the lead agency provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. The County will provide written responses to the SCAQMD's comments as required by Public Resources Code § 21092.5. Further, the comment indicates that SCAQMD staff is available to work with the lead agency to address any issues and any other questions that may arise. The County appreciates and values these comments during the EIR participation process. This comment provides general introductory and background information. Consistent with Public Resources Code Section 21092.5, responses to specific comments are provided below; no further response is required.

### **Response to Comment AQMD 3.**

The commenter is correct that the Project includes demolition, and therefore must comply with SCAQMD Rule 1403. The purpose of SCAQMD Rule 1403 is to specify work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials (ACM). The requirements for Project demolition activities under Rule 1403 include asbestos surveying, notification, ACM removal procedures and time schedules, ACM handling and clean-up procedures, and storage, disposal, and landfilling requirements for asbestos-containing waste materials (ACWM). Similarly, the existing rules requires that the Project construction contractor shall be required to maintain records, including waste shipment records, and use appropriate warning labels, signs, and markings. Therefore, even if asbestos is found within any structures to be demolished, the processes established under Rule 1403 eliminate the potential for potentially significant air quality or hazard impacts related to asbestos.

### **Response to Comment AQMD 4.**

A measure that requires daily monitoring of truck numbers and preclusion of trucks from entering the site is infeasible to impose. For example, it is unclear how a requirement to limit the daily number of trucks allowed at the facility would be enforced. There are also several potential adverse environmental impacts from implementing such a measure, including heavy-duty trucks parking along off-site vicinity roadways



resulting in congestion, parking conflicts with area residents, traffic safety impacts, and increased truck movements and idling in residential neighborhoods arising from trucks queuing in the streets or waiting in adjacent neighborhoods for a new day of truck “counts” to begin.

If and when the County is called upon to issue any subsequent discretionary approval involving the Project, the County is already subject to the obligation to consider whether changed circumstances, new information, or other factors requires additional environmental review pursuant to Public Resources Code § 21166 and State CEQA Guidelines § 15162. As such, there is no requirement or nexus to support the imposition of a measure that would duplicate existing requirements under CEQA.

CEQA requires that an EIR analyze only what is reasonably foreseeable – not to speculate about what potential future activities may (or may not) occur. (State CEQA Guidelines, § 15145.) Here, the EIR and associated air quality and health risk analyses made a number of conservative assumptions regarding exposure rates of air toxics. For instance, as stated on pages 4.1-25 through 4.1-26 of the Draft EIR, the dispersion model employed for the Project analysis was run to obtain the peak 24-hour and annual average concentration in micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ ), which is a conservative methodology since actual 24-hour and annual average and concentrations are dependent on many variables, particularly the number and type of equipment working at specific distances during time periods of adverse meteorology. Additionally, the diesel exhaust Unit Risk Factor (URF) employed in the risk estimate is based upon the upper 95 percentile of estimated risk for each of the epidemiological studies utilized to develop the URF, and is therefore conservative. The risk estimates assume sensitive receptors will be subject to diesel PM for 24 hours a day, 350 days a year, which is conservative considering research conducted by CARB that indicated adults and adolescents in California spent almost 15 hours per day inside their homes, and six hours in other indoor locations, for a total of 21 hours (87% of the day).<sup>4</sup> As an additional conservative measure, the emissions derived assume that every truck accessing the project site will idle for 15 minutes, which is an overestimation of actual idling times since California regulations limiting idling to no more than 5 minutes.

As stated on page 4.1-18 of the Draft EIR, the Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation during Project operations as emissions resulting from Project operations would not exceed any of the SCAQMD regional emissions thresholds for operational activity. Additionally, as stated on pages 4.1-27 and 4.1-28 of the Draft EIR, the increased health risk from heavy trucks would also be below the applicable significance threshold. Nonetheless, while the increased health risk from heavy trucks would be below the applicable significance threshold, Mitigation Measure AQ-1 is recommended in order to enforce existing regulation and reduce the generation of diesel particulate matter. Trucks that run at least partially on electricity are projected by the SCAQMD to become available during the life of the project as discussed in SCAQMD’s 2012 Regional Transportation Plan. Mitigation Measure AQ-1 requires the project to make this electrical infrastructure available when the project is built so that it is ready when this technology becomes commercially available. Additionally, Mitigation Measure AQ-1 enforces existing regulation and provides incentives for

---

<sup>4</sup> *Activity Patterns of California Residents*, California Air Resources Board, UC Berkeley, 1991.

alternative fuel use, both of which will reduce the generation of diesel particulate matter. Mitigation Measure AQ-1 also requires the Project to promote and support clean truck fleets by providing information on the CARB Carl Moyer retrofit program and information on idling limits and nearby alternative fueling stations. The Draft EIR identifies the Project conflicting with the SCAQMD Air Quality Management Plan to a level that is significant since it will exceed land use assumptions in the Plan. As stated on page 4.1-21 of the Draft EIR, there is no feasible mitigation available to reduce these emissions to levels below the threshold.

**Response to Comment AQMD 5a.**

The commenter is correct that the “Non-Default Regulatory Option – Flat” was employed in AERMOD, the air pollutant dispersion model used for the Health Risk Assessment completed for the Project. This option was selected based on the topography of the Project site, which is flat and devoid of any hills or berms. Based on the flat terrain and no hills or berms on the site, there is no available hill height scale input to accommodate an “Elevated – Non-Default Regulatory Option.” Additionally, as part of Project construction, the site is proposed to be graded and further leveled. AERMOD does not make any distinction between elevated terrain below the inputted pollutant release height, which as discussed further below, is 8.37 feet. Therefore the “Non-Default Regulatory Option – Flat” was employed, and the impacts were not underestimated.

**Response to Comment AQMD 5b.**

The commenter suggests that other meteorological stations closer to the Project should have been referenced. The SCAQMD provides meteorological data from 27 different locations within the South Coast Air Basin that is able to be inputted into AERMOD. Meteorological data obtained at the San Bernardino monitoring station was used for the Health Risk Assessment based on its geographic proximity to the Project site, coupled with the fact that this data is the most conservative available, thus leading to a worst-case depiction of potential Project impacts. While the comment suggests obtaining meteorological data from the Rubidoux station, this station is not one of the 27 different locations that offers data to input into AERMOD. Therefore, employing data from the Rubidoux station for the purposes of the Health Risk Assessment is not a reasonable option. The comment also suggests obtaining meteorological data from the Fontana station, which is nearer to the Project site than the San Bernardino station. However, while the Fontana station is closer than the San Bernardino station, the meteorological data it provides is less conservative.

Specifically, the data provided from the San Bernardino station includes calmer wind patterns than that provided from the Fontana station, thus less pollutant dispersion at the most exposed areas near the Project site, and more conservative health risk projections. Specifically, the San Bernardino monitoring station data includes ‘calm days’ or days with no wind, while the Fontana monitoring station does not. Additionally, the Fontana data includes days experiencing wind speeds within the highest two wind classes, while the San Bernardino station data does not identify wind patterns reaching such speeds. Since the data from the San Bernardino station includes days with no wind and does not include wind speeds

within the highest two wind classes, it accounts for less pollutant dispersion, higher pollutant concentrations, and is thus the most conservative data available.

**Response to Comment AQMD 5c.**

The commenter noted concern regarding the 100 meter spacing of receptors. According to the SCAQMD's Supplemental Guidelines for Preparing Risk Assessments for the Air Toxics "Hot Spots" Information and Assessment Act (AB 2588), air dispersion modeling is required to estimate (a) annual average concentrations to calculate the Maximum Individual Cancer Risk (MICR), the maximum chronic hazard index (HI), the zones of impact, and excess cancer burden and (b) peak hourly concentrations to calculate the health impact from substances with acute non-cancer health effects. To achieve these goals, the receptor grid should begin at the facility fence line and extend to cover the zone of impact. In addition, the receptor grid should be fine enough to identify the points of maximum impact. According to the SCAQMD, in order "to identify the maximum impacted receptors (i.e., peak cancer risk and peak hazard indices) a grid spacing of 100 meters or less must be used," (see page 16 of SCAQMD's Supplemental Guidelines). The modeling and analysis was prepared in accordance with the SCAQMD Guidelines.

Additionally, the analysis did not miss potential peak concentration levels at any sensitive receptors. Potential peak concentration levels at sensitive receptors were identified through the examination of pollutant concentration contour mapping. Where multiple concentration levels are identified within a single receptor grid, the highest concentration level identified is used for the purpose of determining the health risk within that receptor grid.

**Response to Comment AQMD 5d.**

The commenter noted concern regarding the exclusion zones. The Project exclusion zone includes the Project site. According to SCAQMD protocols, project sites should not be included as a receptor for the purposes of determining pollutant dispersion from the said project site and the resultant concentration levels at vicinity sensitive receptors. The pollutant concentration levels within the Project boundary/volume source exclusion zone were not considered in the analysis of potential health risk to sensitive land uses.

**Response to Comment AQMD 5e.**

The California Office of Environment Health Hazard Assessment (OEHHA) 2015 Guidance Manual for the Preparation of Health Risk Assessments (OEHHA 2015 Health Risk Assessment Guidance) does not provide AERMOD modeling guidance. The separated line 2W volume source was employed consistent with the recommendations of the California Air Pollution Control Officers Association (CAPCOA) Health Risk Assessments for Proposed Land Use Projects (2009) document (page 54 of Attachment 1, *Technical Modeling Guidance*), which provides guidance for modeling roads/line sources in AERMOD. This guidance is necessary since AERMOD does not have a pollutant source option directly specific to mobile sources. According to CAPCOA, the best method for modeling emissions from travelling truck vehicles in AERMOD is to use a series of multiple volume sources. Thus, 2W volume sources involves a series of volume sources

---

to approximate a line source. This methodology is consistent with the U.S. EPA AERMOD User's Guide (2011). AERMOD can be used to predict the concentrations of pollutants emitted from vehicles on roads.

**Response to Comment AQMD 5f.**

The line volume source (on-site and off-site diesel truck travel) inputted into the software accounted for a diesel particulate matter release height of 8.37 feet in order to provide a conservative analysis (i.e., using a higher release heights would actually result in a smaller impact by allowing pollutants to disperse before they affect a receptor). While 8.37 feet is a low release height for some heavy-duty diesel trucks, a lower release height equates to increased ground-level concentrations, thus less pollutant dispersion at the most exposed areas near the Project site, and more conservative health risk projections.

**Response to Comment AQMD 5g.**

AERMOD can be used to predict the concentrations of pollutants emitted from idling vehicles. AERMOD has 4 basic types of sources (i.e., point, area, volume, and open pit). Area sources are used to model releases that occur over an area, as differentiated from line volume sources which are used to model releases from traffic traveling along roadways. The Area Source model option is more appropriate for depicting a loading dock area where the pollutant source is idling heavy-duty trucks. This is because, as stated in Chapter 4 of the OEHHA 2015 Health Risk Assessment Guidance, Area Sources are generally sources of particulate matter and include "parking lots", which are synonymous with warehouse loading zones. Additionally, CAPCOA states in its Health Risk Assessments for Proposed Land Use Projects (2009) document that parking lots are often analyzed as an area source.

**Response to Comment AQMD 5h.**

As identified by the AERMOD dispersion model, the dominant wind direction is to the northeast of the Project site. Therefore, modeling accounted for 100 percent of all heavy-duty truck traffic traveling north on Cedar Avenue to account for a worst-case pollutant concentration at the neighborhoods to the northeast, the direction of the prevailing winds. As identified in the Health Risk Assessment, health risk was determined to be less than significant even though the model pollutant concentrations at the Project's downwind receptors are based on the conservative calculation that 100 percent of all heavy-duty truck traffic travels in the same direction. Therefore, health impacts to receptors located south of the Project (where less than one-third of the Project truck traffic that will occur, and upwind of the Project site, will necessarily also be less than significant.

**Response to Comment AQMD 5i.**

The Health Risk Assessment calculates the dispersion of diesel particulate matter based on fine particulate matter (PM<sub>2.5</sub>) as this emission-type is most representative of diesel particulate matter than course particulate matter (PM<sub>10</sub>), which is more representative of fugitive dust and/or the by-product of a wood-fire.

**Response to Comment AQMD 5j.**

The Health Risk Assessment derived its diesel particulate matter emission rate by averaging the annual fleet mix emission rate averages of the years 2018 through 2048, which is 30 years and assumed to span the life of the Project. This emission rate was used to model pollutant concentrations in the Project vicinity. The model concentrations at sensitive receptors were then used to quantify the health risk at sensitive receptors using the 2015 California OEHHA Health Risk Assessment Guidelines. The OEHHA 2015 Health Risk Assessment Guidance provides different exposure periods depending on the applicable residency period. OEHHA recommends using 30 years as the basis for estimating cancer risk at the maximally exposed individual receptor in all health risk assessments. As shown in Appendix B, age sensitivity factors were employed in the Health Risk Assessment in order to accurately estimate potential health risk resultant of exposure of an individual to pollutant concentrations beginning when that individual begins the third trimester of their mother's pregnancy. Accordingly, the Health Risk Assessment did not underreport potential impacts.

**Response to Comment AQMD 6.**

The Project would not result in a significant impact to health risk, and therefore, the suggested mitigation measures are not required. (State CEQA Guidelines § 15126.4(a)(3).) The Draft EIR does identify the Project conflicting with the SCAQMD Air Quality Management Plan to a level that is significant since it will exceed land use assumptions in the Plan. As stated on page 4.1-21 of the Draft EIR, there is no feasible mitigation available to reduce these emissions to levels below the threshold. While the commenter provides seven mitigation measures as recommendations, these are either infeasible, unnecessary, ineffective, or redundant.

For instance, the recommendation to require the use of 2010 compliant trucks, alternatively fueled delivery trucks, or non-diesel powered trucks is infeasible in light of the Project's objectives to capitalize on nearby transportation corridors and truck routes and facilitate goods movement for the benefit of local and regional economic growth. In order to achieve these objectives, the Project must accommodate trucks from multiple different private fleets and independent trucking contractors and therefore, limiting the type of trucks that can access the proposed facility based on a narrow set of parameters is infeasible. It is noted that heavy duty diesel trucks are being developed to operate more and more efficiently, and that as time progresses, overall heavy-duty diesel truck emissions will diminish. On December 12, 2008, CARB approved the Truck and Bus Regulation to significantly reduce particulate matter and oxides of nitrogen emissions from existing diesel vehicles operating in California. The regulation has imposed requirements for diesel trucks and buses that operate in California to require upgrades to reduce emissions. For instance, heavier trucks had to be retrofitted with particulate matter filters beginning January 1, 2012, and older trucks had to be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses would need to have 2010 model year engines or equivalent.

In terms of implementing mitigation in order to require that the project is limited to the activities analyzed in the Draft EIR, there is no requirement or nexus to support the imposition of a measure that would duplicate existing requirements under CEQA. If and when the County is called upon to issue any

---

subsequent discretionary approval involving the Project, the County is already subject to the obligation to consider whether changed circumstances, new information, or other factors requires additional environmental review pursuant to Public Resources Code § 21166 and State CEQA Guidelines § 15162.

A similarly unnecessary recommended mitigation measure is the requirement to have truck routes marked with trailblazer signs so that no trucks will enter residential areas due to the specific location of the Project site located adjacent to, and with direct access to Cedar Avenue, the primary travel corridor to be utilized by the proposed Project. The anticipated truck distribution and circulation for the Project is also the most efficient, and there would be no incentive for trucks to enter residential neighborhoods.

The remaining recommended mitigation measures included in the comment suggest requiring the promotion of clean truck incentive programs as well as the implementation of electrical infrastructure to accommodate electric-powered trucks. Such measures are already required under Mitigation Measure AQ-1 of the Draft EIR which requires the Project to make this electrical infrastructure available when the Project is built so that it is ready when this technology becomes commercially available. Additionally, Mitigation Measure AQ-1 enforces existing regulation and provides incentives for alternative fuel use, both of which will reduce the generation of diesel particulate matter. Mitigation Measure AQ-1 also requires the Project to promote and support clean truck fleets by providing information on the CARB Carl Moyer retrofit program and information on idling limits and nearby alternative fueling stations.

**COMMENT LETTER: SAN MANUEL BAND OF MISSION INDIANS (SAN MANUEL)**

Comment Letter: SAN MANUEL

**From:** Joan Schneider <JSchneider@sanmanuel-nsn.gov>  
**Sent:** Thursday, January 26, 2017 2:31 PM  
**To:** White, Kevin - LUS  
**Subject:** Bloomington Industrial Facility DEIR, SCH #2016031085

January 26, 2017

Dear Mr. White:

While reviewing San Manuel Band of Mission Indians files for background for NOP for the Bloomington Business Center, I reviewed the DEIR for the above project, especially the portions that had to do with Cultural Resources and Tribal Cultural Resources. I want to commend the company (Dudek) for its thorough and interesting background section. I found one error and you might ask Dudek to correct it. In Section 4.2-14, there is a reference to the home occupied by Ritner Sayles and Gerald Smith. Maxine Smith was not a psychiatrist (an MD with specialty in psychiatry) but she did hold a doctorate degree in psychology. There is a BIG difference. Tribe looks forward to working with County and the developer on this project during its implementation.

1

Thank you for sending to Tribe the disk with the DIER. San Manuel Band of Mission Indians appreciates the County of San Bernardino conducting consultation for this project.

Respectfully,



Joan S. Schneider, PhD  
San Manuel Band of Mission Indians  
Cultural Resource Management Department  
Consulting Archaeologist  
[jschneider@sanmanuel-nsn.gov](mailto:jschneider@sanmanuel-nsn.gov)  
26569 Community Center Drive  
Highland, CA 92346

THIS MESSAGE IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHICH IT IS ADDRESSED AND MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL AND EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW. If the reader of this message is not the intended recipient or agent

responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination or copying of this communication is strictly prohibited. If you have received this electronic transmission in error, please delete it from your system without copying it and notify the sender by reply e-mail so that the email address record can be corrected. Thank You



---

**RESPONSE TO COMMENT LETTER: SAN MANUEL BAND OF MISSION INDIANS (SAN MANUEL)****Response to Comment SAN MANUEL 1.**

Commenter commends the cultural resources work done on the Project site. However, the commenter does suggest that a minor correction be made on Section 4.2-14, where Maxine Smith was referenced as a psychiatrist when in reality Maxine Smith held a Ph.D. in psychology. This information will be forwarded to the cultural resources consultant to update its information.

This comment does not identify a specific concern with the adequacy of the Draft EIR or raise an issue or comment specifically related to the Draft EIR's environmental analysis. Therefore, no further response is warranted. (State CEQA Guidelines §15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)

**COMMENT LETTER: LABORERS INTERNATIONAL UNION OF NORTH AMERICA (UNION)**

Comment Letter: UNION



T 510.836.4200  
F 510.836.4205

410 12th Street, Suite 250  
Oakland, Ca 94607

www.lozeaudrury.com  
michael@lozeaudrury.com

February 2, 2017

**VIA E-MAIL**

Board of Supervisors  
County of San Bernardino  
385 N. Arrowhead Ave., Fifth Floor  
San Bernardino, CA 92415

**Re: Notice of Support for Bloomington Industrial Facility Project ("Project")**

Dear Honorable Supervisors:

Laborers International Union of North America, Local Union No. 783 ("LIUNA") has voiced concerns on the Draft Environmental Impact Report prepared for the Project. The Project is being developed by Western Realco ("WR").

LIUNA is pleased to announce that they have reached an agreement with WR to resolve LIUNA's concerns. Pursuant to our agreement, WR has agreed to implement measures to protect the environment.

In consideration of these measures, LIUNA is pleased to support the Project, and urges the Board of Supervisors to approve the Project. LIUNA believes that the construction and operation of the Project will benefit the County.

Thank you for your attention to this matter.

LABORERS INTERNATIONAL UNION OF NORTH AMERICA,  
LOCAL UNION NO. 783

By: Michael R. Joyce

Its: Attorney

---

**RESPONSE TO COMMENT LETTER: LABORERS INTERNATIONAL UNION OF NORTH AMERICA (UNION)****Response to Comment UNION 1.**

This comment provides general information and indicates support for the proposed Project. This comment does not identify a specific concern with the adequacy of the Draft EIR or raise an issue or comment specifically related to the Draft EIR's environmental analysis. Responses to specific comments are provided below; no further response is required. (State CEQA Guidelines §15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)

**COMMENT LETTER: GOLDEN STATE ENVIRONMENTAL JUSTICE ALLIANCE (JUSTICE ALLIANCE)**

Comment Letter: JUSTICE ALLIANCE

Page 1 of 14



February 5, 2017

VIA EMAIL

Kevin White, Senior Planner  
County of San Bernardino Land Use Services Department – Planning Division  
385 North Arrowhead Avenue, First Floor  
San Bernardino, CA 92415-0187  
[kevin.white@lus.sbcounty.gov](mailto:kevin.white@lus.sbcounty.gov)

**SUBJECT: COMMENTS ON WESTERN REALCO BLOOMINGTON INDUSTRIAL FACILITY EIR**

To whom it may concern:

Thank you for the opportunity to comment on the Environmental Impact Report (EIR) for the proposed Western Realco Bloomington Industrial Facility. Please accept and consider these comments on behalf of Golden State Environmental Justice Alliance. Also, Golden State Environmental Justice Alliance formally requests to be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. Send all communications to Golden State Environmental Justice Alliance P.O. Box 79222 Corona, CA 92877.

1

**1.0 Summary**

As we understand it, the proposed project includes the development of a single 676,983 square foot distribution building within an approximately 34.54-acre property, with associated facilities and improvements such as a guard booth, parking, bicycle racks, landscaping and detention basins. Two detention basins would be located near the Project’s southern boundary along Cedar Avenue and Jurupa Avenue to provide water quality and runoff metering functions. Landscaping would be provided and would represent approximately 15 percent of the site coverage.

cont'd  
1

The project proposes 272 automobile parking stalls constructed for employee parking with access from Cedar Avenue and Jurupa Avenue. Parking and site paving would be concrete and asphalt, and would represent approximately 38 percent of the site coverage. Truck access would be from Cedar Avenue, and the dockyard would include 138 trailer storage stalls, four (4) grade level ramps, and 110 dock high doors.

### 3.0 Project Description

The EIR states that project site is composed of 17 parcels, in which “four of the parcels are publicly owned by San Bernardino County: Flood Control District (SBCFCD) (APN 0257-081-07, 0257-091-12, and 0257-091-24), and one parcel is owned by the Bloomington Recreation and Parks District (Parks District) (APN 0257-091-15). However, there is no ownership map provided or County APN map provided to illustrate this information. An ownership map must be provided in order to comply with CEQA’s requirements for meaningful disclosure.

2

The EIR also states that “much of the new development that is occurring in the general Project area is industrial in nature”. The EIR does not provide a list of industrial projects in the area to support this statement. There is no evidence provided to support this statement. This statement is misleading to the public and decision makers and must be removed in order to comply with CEQA’s requirements for meaningful disclosure.

3

The conceptual site plan (Exhibit 3.0-5) indicates that there are two offices proposed as part of the project - a primary and secondary office. This information is not included anywhere in the project description. There square footage of the offices is not provided. The project description throughout the EIR must be revised to include the ancillary uses and square footage of the proposed primary and secondary office spaces in order to comply with CEQA’s requirements for meaningful disclosure.

4



*Project Circulation*

The EIR states that “Project access would be from Cedar and Jurupa Avenues”. The conceptual site plan (Exhibit 3.0-5) indicates that there are two 40’ wide entrances and drive aisles on Cedar Avenue, two 30’ wide entrances on Cedar Avenue, and one additional entrance on Cedar Avenue that is not dimensioned. There is one 40’ wide entrance and drive aisle on Jurupa Avenue. This indicates that truck access will be provided on both Jurupa and Cedar Avenues. The Proposed Project section of the Project Description states that “truck access would only be from Cedar Avenue” when the site plan illustrates that truck access will occur from both Jurupa and Cedar. Further, there are dock doors facing Jurupa Avenue that will be accessed from the Jurupa entrance. There is also 40’ wide aisle on the west side of the building that connects the north end docks to the Cedar Avenue entrance/exit, further demonstrating that the Jurupa Avenue aisle will be used for truck access. The statement that “truck access would only be from Cedar Avenue” is misleading to the public and decision-makers and does not comply with CEQA’s requirements for meaningful disclosure. The statement must be removed and updated in order to be consistent with site design, circulation, and conceptual site plan. Any environmental analysis within the EIR must also be revised to take into account the truck access on Jurupa Avenue - including but not limited to traffic, air quality (odors, sensitive receptors), and hazards/hazardous materials.

5

*Discretionary Actions and Approvals*

The EIR states that “Approval of Tentative Parcel Map 19635 to combine the existing 17 parcels into one lot on 34.54 acres” will be required in order to approve the proposed project. However, TPM 19635 is not included for review by the public or decision makers. TPM 19635 must be included for public review in order to comply with CEQA’s requirements for meaningful disclosure.

6

Further, “Abandoning the existing San Bernardino County Flood Control easement through the center of the project site, and dedication of a new easement along the northeast and eastern boundaries of the site” is also required to approve the project. Again, a map demonstrating the existing location of the San Bernardino County Flood Control easement and the proposed San Bernardino County Flood Control easement is not provided for review by the public and decision makers. A map disclosing the location of the existing and proposed easements must be included in order to comply with CEQA’s requirements for meaningful disclosure.

7

#### 4.0 Environmental Analysis

##### *Cumulative Projects*

The EIR methodology for determining cumulative projects is not adequate. The EIR states that “cumulative project data was requested from the County of San Bernardino and the City of Rialto. The County of San Bernardino provided a comprehensive list of development activity for the region. *The City of Rialto did not provide any development data for the project study area. The 26 page list of developments provided by the County was processed, and the appropriate developments have been included in this cumulative analysis*”. The EIR methodology should include any and all projects with a potentially cumulative impact to the region, regardless of whether or not the jurisdiction provided the information. Further, the scope of the project area should have a regional approach as the proposed project will have a logical travel pattern from the Ports of Los Angeles and Long Beach. The following list of projects to be included in the cumulative analysis is not exhaustive but provides a minimum standard for cumulative analysis for projects that are “in the pipeline” proposed, currently being processed, under construction, or recently operational:

1. Colony Commerce Center, Ontario: 2.9 million square feet of industrial use
2. San Gorgonio Crossings, Riverside County: 1.8 million square feet of industrial use
3. Perris Gateway Commerce Center, Perris: 380,000 square feet high cube warehouse
4. Indian Street Commerce Center, Moreno Valley: 446,000 square feet of industrial use
5. Moreno Valley Logistics Center, Moreno Valley: 1.7 million square feet of industrial use
6. Chestnut Street Warehouse, City of Industry: 614,000 square feet of industrial use

These projects should be included in the cumulative projects analysis in order to fully disclose the potentially cumulative impacts of the proposed project.

##### *Table 4.01 - Cumulative Projects*

The table presents a list of 12 projects given by the County of San Bernardino for analysis in the EIR. The table only gives the project number to identify to the project, which is completely irrelevant to the general public and decision makers as they do not have access to the County’s project numbers to identify the projects. A brief, one or two word description and size (square footage) of the projects are given. The location of these projects is not given at all. The EIR

8

9

does not provide a map of these projects. This does not comply with CEQA’s requirements for meaningful disclosure. The location, name, and distance from the proposed project site must be disclosed in the EIR and they must be pictured on a map for identification.

cont'd  
9

#### 4.1 Air Quality

##### *Impact 4.1-4*

The EIR states that “the Project site is located in an area of large-lot single family homes” but does not state the average lot size, or any lot size for any of the homes in the area. This statement is misleading because it leads the reader towards the assumption that because the lots are large, there are fewer homes and thus fewer sensitive receptors in the area. The statement is not supported by any evidence that the residences in the area are located on “large lots”. The “large-lot” adjective of the statement should be removed from the EIR in order for the EIR to remain an adequate informational document.

10

The EIR then continues to state the distances of the sensitive receptors from the project site, but does not provide a map of the sensitive receptors or indicate where on their respective properties the sensitive receptors were placed for analysis. The EIR refers the reader back to Exhibits 3.0-2 through 3.04, but none of these exhibits illustrate the information relevant to this section - where the sensitive receptors are located in relation to the project site and where they were placed on their respective properties for analysis. Health Risk Assessments are supposed to be conservative and modeling should have assessed what might have happened to sensitive receptors given their exposure at their property lines. The same is true for the schoolchild analysis. There is no basis for not modeling exposures at the property line of the playground they are likely to use daily. At Crestmore Elementary, the playground is oriented towards the project site. At Zimmerman Elementary, the Kindergarten playground is oriented towards the project site and is immediately adjacent to the project site across Linden Avenue. A map of this information must be included for review by the public and decision makers in order to comply with CEQA’s requirements for meaningful disclosure.

11

Additionally, Table 1 of the HRA (Appendix B) does not include the Upland Indonesian Seventh Day Adventist Church which is adjacent to the North of the project site. It is important to note that the church’s programming also includes a Vacation Bible School in which children are at the church all day during the summer. The sensitive receptor analysis must be revised to include the church.

12



*Impact 4.1-5*

The EIR states that “construction activities associated with the Project may generate detectable odors from heavy- duty equipment exhaust” and goes on to say that “construction-related odors would be short-term in nature” even though there is not a required timeline for the project to be completed. However, the EIR does not provide a definition of “short-term” odors or a CEQA exemption for “short-term” odors. Again, there is no map provided to demonstrate where on their respective properties the sensitive receptors were placed for modeling. The EIR is inadequate as an informational document and must be amended to include this information.

13

Additionally, the EIR states that “construction-related odors dissipate rapidly as the nature of construction necessitates the need to move equipment around the construction site throughout a work day”, which has potential for validity except the project site is surrounded by sensitive receptors to the north, east, south, and west so moving around the construction site is irrelevant. As construction may move further from a sensitive receptor to the east, it will get closer to a sensitive receptor in the west, et cetera. This statement must be removed from the EIR or provide further evidence to support this statement. These potentially significant impacts to sensitive receptors are not mitigated and mitigation measures must be adopted as the information presented is speculative and unenforceable. (CEQA § 21081.6 (b).)

Finally, the analysis assumes a maximum 8 hour day of construction. This is contrary to the Noise analysis in which a maximum 12 hour day of construction is permitted (MM NOI 1.5). The Air Quality analysis must be revised to reflect the legally possible 12 hour day of construction that is sanctioned by the mitigation measures of the EIR.

14

**4.5 Land Use**

*Impact 4.5-2*

Here, the EIR again states that “development in the area is generally trending toward industrial uses”. The development of industrial use in the project vicinity conflicts with the General Plan land use designation of BL/RS-1AA. Developing industrial uses in the project vicinity would not meet General Plan goals, policies, or objectives and would require a General Plan Amendment for approval. Additionally, later in this section the EIR states that the proposed project is inconsistent with the General Plan because it is located in a “predominantly residential area”. The statement that “development in the area is generally trending toward industrial uses”

15

should be removed as it is misleading to the public and decision-makers and presents a skewed view of the project site and vicinity.

cont'd  
15

The EIR indicates that “in an effort to shield adjacent residences from the proposed industrial development, the Project proposes a 100 foot setback from Cedar Avenue”. However, the building setback is not depicted on the Conceptual Site Plan (Exhibit 3.0-5). The landscaped area is depicted as 40’ wide and the parking lot is 26’ wide, indicating that the remaining, smaller planter adjacent to the building would need to be 34’ wide but that information is not given on Exhibit 3.0-5. Even though the building would potentially be setback 100’ from Cedar Avenue, there will still be continuous truck traffic through Cedar Avenue as that is described as the main entrance for the building. Please explain how a 100’ foot setback will help “shield” residents from the industrial use as it is not clear in the EIR. Possible mitigation measures could include a 100’ wide landscaped buffer between Cedar Avenue and the parking lot, but that is not discussed in the EIR.

16

Further, there are residences adjacent to the south along Jurupa Avenue and to the west along Linden Avenue as well but they are not mentioned in the EIR’s attempt to “shield” residents from industrial development. A 100 foot landscaped buffer along the south and west sides of the project site would be a potentially beneficial mitigation measure. This is especially true since along the west side of the building (Linden Ave.) there is a smaller, un-dimensioned landscape area adjacent to a 40’ wide drive aisle and on the south side (Jurupa Ave.) the residents face what appears to be at least 40 loading dock doors (we are not told in the EIR how many dock doors are on each side of the building, respectively), 15 truck parking spaces, and a large surface parking lot for passenger cars.

17

*Table 4.5-2*

The table presents the goals, policies, and objectives as “San Bernardino County General Plan Bloomington Community Plan 2007”. The San Bernardino County General Plan and Bloomington Community Plan are two separate documents. The first objective presented is from the San Bernardino County General Plan and the following two provisions are from the Bloomington Community Plan. They should be revised and labeled as such.

18

Additionally, the EIR does not discuss the proposed project’s consistency or inconsistency with the following goals and policies from the San Bernardino County General Plan:

19a

GOAL V/LU 1. Provide opportunities, where possible, for a rural lifestyle that preserves the unique character within suitable locations of the Valley Region.

POLICIES V/LU 1.1

Where appropriate, support small scale agricultural uses and animal-raising activities that are established in association with rural residential uses to ensure the continuation of an important lifestyle in the Valley communities of Bloomington and Muscoy by maintaining the Additional Agricultural Overlay as delineated on the Land Use Policy Map.

The EIR does not discuss the proposed project's consistency or inconsistency with the following goals and policies from the Bloomington Community Plan:

Goal BL/LU 1. Provide a mix of housing choices that support a range of lifestyles in the community, ranging from traditional urban neighborhoods to more "rural" neighborhoods.

Policy BL/LU 1.1 Require strict adherence to the Land Use Policy Map unless proposed changes are clearly demonstrated to be consistent with the community character.

Goal BL/LU 2. Provide opportunities for a rural lifestyle that preserves the unique character within suitable locations (i.e. "policy areas") of the Bloomington Community Plan.

Policy BL/LU 2.1 Support small scale agricultural uses and animal-raising activities that are established in association with rural residential uses to ensure the continuation of an important lifestyle in the community plan area by maintaining the Additional Agricultural Overlay as delineated on the Land Use Policy Map.

Policy BL/LU 2.2 Utilize the following "policy areas" to identify and define subareas within the Bloomington Community Plan requiring a minimum 1 acre parcel size; and those requiring 20,000 sq. ft. minimum parcel size.

- A. The "policy area" for the 1 acre minimum parcel size (AAOverlay) is bounded by the Fontana City Limits line to the west; Spruce Street to the east; Jurupa Ave. to the south; and Santa Ana Ave. to the north.
- B. A "policy area" for the 20,000 sq. ft. minimum parcel size (AA Overlay) is bounded by Spruce Street to the west; the Rialto City Limits line to the east; El Rivino Rd. (the County Line) to the south, and Jurupa Ave. to the north [this policy area, however, does not include (i.e.,

cont'd  
19a



excepts therefrom) the property designated "AM/SP – Industrial," Agua Mansa Specific Plan – Industrial].

C. A "policy area" for the 20,000 sq. ft. minimum parcel size (AA Overlay) is bounded by the Fontana City Limits line to the west, Locust Ave. to the east, Santa Ana Ave. to the south, and Slover Ave. to the north.

D. A "policy area" for the 20,000 sq. ft. minimum parcel size (AA Overlay) is bounded by Spruce Street on the west, the Rialto City Limits line to the east, Jurupa Ave. to the south, and Slover Ave to the north.

Policy BL/LU 2.3 In recognition of the community’s desire to maintain rural residential areas, projects within the AA Overlay that propose to increase the density of residential land uses shall be considered only if the following findings can be made:

A. That the change will be consistent with the community character. In determining consistency the entire General Plan and all elements of the community plan shall be reviewed.

B. That the change is compatible with surrounding uses, and will provide for a logical transition in the plan area's development. One way to accomplish this is to incorporate planned development concepts in the design of projects proposed in the area.

C. That the change shall not degrade the level of services provided in the area, and that there is adequate infrastructure to serve the additional development that could occur as a result of the change. Densities should not be increased unless there exist, or are assured services and infrastructure, including but not limited to water, wastewater, circulation, police, and fire, to accommodate the increased densities.

The existing land use designation for the project site is Bloomington/Residential 1 Acre Minimum lot size-additional agricultural overlay (BL/RS-1AA) and Bloomington/Institutional (BL/IN). The proposed project is not consistent with GOAL V/LU 1 and POLICY V/LU 1.1 as it does not maintain the Additional Agricultural Overlay at the project site. The EIR does not disclose or discuss this information. The EIR is inadequate as an informational document and does not comply with CEQA’s requirements for meaningful disclosure to the public and decision makers.

**4.6 Noise**

*Exhibit 4.6-1*

cont'd  
19a

19b

20

The exhibit indicates that sensitive receptors were not placed at their property lines nearest the project site for the noise analysis and modeling. Additionally, the only residential receptor measurement or modeling location along Linden Avenue was at 11266 Linden Avenue (M3). This residence is directly adjacent to the existing Edison substation and not the project site. The noise analysis is skewed in presenting analysis that does not include those who will be most affected - the residents along Linden Avenue that are not buffered by the existing substation. Further, M4 measurement was taken 2:56 PM - 3:11 PM, when the kindergarteners are likely to already be out of school for the day. There was also no noise measurement or modeling conducted for Crestmore Elementary, east of the project site even though the playground is oriented towards the project site. There was no noise measurement or modeling at Kessler Park, southwest of the project site even though the park is identified as a sensitive receptor. The noise analysis must be substantially revised to include this information.

cont'd  
20

*On-Site Operations Noise*

The EIR states that “operations in the proposed industrial building may be conducted 24 hours a day”. The EIR then states that the “nearest residences in the vicinity of the proposed Project site are located approximately 700 feet from the center and approximately 150 feet from the nearest side of the proposed industrial building, to the west”. This is contrary to information given throughout the EIR. There is no explanation given for the sensitive receptors to now be located 700 feet and 150 feet away from the project site. The residents will still be affected 24 hours a day by incoming truck traffic along Jurupa and Cedar Avenues, loading and dock doors along Jurupa Avenue, and a 40’ wide driveway adjacent to Linden Avenue. Please explain the reasoning behind placing the sensitive receptors 700 feet from the building and 150 feet from the west side of the building, respectively. The noise analysis should be conservative and place sensitive receptors at their property lines throughout the duration of analysis for construction and operational impacts.

21

**4.7 Transportation and Circulation**

The EIR does not discuss the proposed project’s consistency or inconsistency with the following goals and policies from the Bloomington Community Plan:

22a

Goal BL/C11. Ensure a safe and effective transportation system that provides adequate traffic movement while preserving the rural character of the community.

Policy BL/CI 1.1 Ensure that all new development proposals do not degrade Levels of Service (LOS) on Major Arterials below LOS “C” during non-peak hours or below LOS “D” during peak- hours.

22b

Policy BL/CI 1.2 Ensure that transportation system improvements are made to Slover Avenue and Valley Boulevard where facilities are at or near capacity.

22c

Policy BL/CI 1.3 Full street improvements including paving, curbs, gutters and sidewalks shall be encouraged where necessary for public health, safety and welfare. Waiver of full road improvements in areas where parcel sizes are 1 acre or larger and where the public health, safety and welfare are not endangered may be considered. This may be accomplished by the following methods:

- A. Require the installation of full street improvements for higher density residential (greater than 1 du/acre), commercial, industrial, and institutional developments permitting safe pedestrian access.
- B. Require road improvements consisting of paving, curbs and gutters on major, secondary highways, collector streets and for major tract developments where the density is greater than 1 dwelling unit per gross acre.
- C. Require paved road shoulders and dikes to be constructed, as necessary, on local roadways designated as “water-carrying” by the County Public Works Department for proper drainage.

22d

Policy BL/CI 1.5 Work with adjacent cities and appropriate agencies to identify deficiencies and provide needed improvements at the intersections of Cedar Avenue, Alder Avenue, Cactus Avenue and Interstate 10. Researched deficiencies shall include an evaluation of both vehicular and pedestrian access, and circulation at these intersections.

22e

Policy BL/CI 1.6 Adopt and enforce a truck route plan for the Bloomington plan area that limits truck traffic to designated truck routes. Signs and improved enforcement shall direct non-local and through trucks to the designated truck routes. The truck route plan shall also identify opportunities for Transportation Services within the plan area to accommodate truck parking. Coordinate truck routing plans with the adjacent cities. Truck routes to include the following:

22f

- A. Slover Avenue
- B. Cedar Avenue

*Exhibit 4.7-1*



The exhibit indicates that no analysis of impacts to the CA-60 freeway was taken even though the CA-60/Rubidoux Boulevard exit provides direct access to the project site (Rubidoux Boulevard becomes Cedar Avenue north of El Rivino Boulevard, approximately 1.4 miles from the project site).

23

*Impact 4.7-1*

Again, it is clear that the EIR did not analyze the potential impacts to the CA-60/Roubidoux Boulevard exit, even though it is anticipated for at least 30% of the inbound and outbound traffic from the project site to come from this direction.

**8.0 Alternatives**

CEQA requires analysis of a “reasonable range” of alternatives. Here, since the No Project Alternative is required, the EIR analyzes only two. This does not comply with a reasonable range of alternatives.

24

*Project Objectives*

The objective “Provide a new land use that is in support of the County of San Bernardino’s upcoming General Plan review to promote the Bloomington area” is unverifiable by the public or decision makers. The new General Plan has not been adopted and is not in effect. There is no support or evidence to demonstrate that the project site will have a General Plan land use designation that is different from the existing designation. A draft of the General Plan land use map or land use element is not provided. This objective is misleading to the public and decision makers as it leads the reader to believe that the land use change to the project site is imminent, already planned or approved, when it cannot be reasonably verified and the new General Plan has not yet been approved.

25

The objective “Reduce existing blight and the opportunity for criminal activity and provide for a range of potential light industrial, manufacturing and warehouse uses” presents two separate goals. The EIR does not discuss anywhere how the development of an industrial use will reduce blight or the opportunity for criminal activity, and how that goal is related to providing a range of industrial uses. The EIR does not discuss why or how the existing project site is “blighted” or provide reasoning for this conclusion. There is no discussion of any criminal activity at the project site either. This objective is misleading to the public and decision makers as it leads the

26

reader to believe the development of the project will reduce crime even though no crime statistics are presented.

cont'd  
26

*Alternative 3: Commercial Use Alternative*

Alternative 3 is found to not meet the objective to “reduce existing blight and the opportunity for criminal activity and provide for a range of potential light industrial, manufacturing and warehouse uses”. Not meeting the industrial use portion is obvious, but there is no explanation regarding how a commercial use would not reduce “existing” blight and the opportunity for criminal activity. If the site is considered “blighted” in its current state because it is vacant, then it is logical to assume that any development to activate the site would improve the “blighted” condition. Please provide an explanation of how Alternative 3 does not meet this objective.

27

*Alternatives Considered but Rejected*

An alternative location was rejected even though the proposed project requires a GPA and will have significant and unavoidable impacts to air quality and land use. The land use analysis of the EIR states that “because the impact is fundamentally related to the location of the project, no mitigation measures have been identified to resolve these inconsistencies”. This is the only alternative presented for analysis that was rejected. A reasonable range of alternatives should identify at least one alternative in which significant impacts can be mitigated or the GPA is not necessary. Additional alternatives for analysis could include, but are not limited to:

28

1. A project site that does not require a GPA.
2. A reduced intensity alternative that reduces the scope of the project enough to avoid significant impacts to air quality.
3. A project that complies with the existing General Plan Land Use designation.
4. A project design that eliminates the 40’ wide driveway adjacent to Linden Avenue in order to further mitigate impacts to sensitive receptors along Linden Avenue.
5. A project design with 100’ wide landscaped buffers along all sides of the building in order to mitigate urban blight, noise, odors, and other impacts associated with the operation of a 24-hour industrial use.
6. A project that complies with the existing (-AA) additional agricultural overlay designation at the project site.

**Conclusion**



For the foregoing reasons, GSEJA believes the EIR is flawed and an amended EIR must be prepared for the proposed project and recirculated for public review. Golden State Environmental Justice Alliance requests to be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. Send all communications to Golden State Environmental Justice Alliance P.O. Box 79222 Corona, CA 92877.

29

Sincerely,



Joe Bourgeois  
Chairman of the Board  
Golden State Environmental Justice Alliance

---

**RESPONSE TO COMMENT LETTER: GOLDEN STATE ENVIRONMENTAL JUSTICE ALLIANCE (JUSTICE ALLIANCE)****Response to Comment JUSTICE ALLIANCE 1.**

This comment provides general information pertaining to the proposed Project, and requests that the commenter be added to the distribution and notice list for the Project. The County will add the commenter to the notice and distribution list for any further Project notices. Beyond this, this comment does not identify a specific concern with the adequacy of the Draft EIR or raise an issue or comment specifically related to the Draft EIR's environmental analysis. Responses to specific comments are provided below; no further response is required. (State CEQA Guidelines §15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)

**Response to Comment JUSTICE ALLIANCE 2.**

The comment indicates that an ownership map or County assessor parcel number (APN) map should be provided in order to illustrate how the Project site is divided between the 17 existing parcels. The exiting parcels are identified in Table 3.0-1 on page 3.0-9 of the Draft EIR, and an aerial view of the project site is provided on Exhibit 3.0-03 Project Footprint, of the preceding page. In addition, new Exhibit 3.0-7 Existing Parcels, in Section 3.0 Errata to the Draft EIR 3.0, for the existing parcel layout is provided for your information. The new parcel layout exhibit merely clarifies the existing information, the map is not required for disclosure purposes, and does not constitute significant new information under CEQA or require recirculation under CEQA Guidelines Section 15088.5 (see Section 1.4 herein for additional discussion).

Among CEQA's purpose is to disclose to the public the significant environmental effects of a proposed discretionary project, through the preparation of an appropriate CEQA documents. In this case an environmental impact report has been prepared, including a project description, and existing conditions information that provides sufficient context for the meaningful analysis of the Project's potentially significant impacts, consistent with CEQA requirements. All of the specific content requirements for an EIR have been met, and the lack of a particular item from the Draft EIR does not constitute a deficiency under CEQA.

**Response to Comment JUSTICE ALLIANCE 3.**

The comment states that the Draft EIR is misleading in that it states that "much of the new development occurring in the general Project area is industrial in nature", and the Draft EIR does not provide a list of industrial Projects in the area to substantiate this.

The Draft EIR acknowledges that, in general, much of the new development occurring in the Project vicinity is industrial in nature. This sentiment is based on review of aerial photography, recent projects known to be developed, and recent applications for development. As provided in Section 4.7, a full list of cumulative impacts in the Project vicinity provides some context as to the type of projects being built in

the general area, a list that is dominated by industrial projects. Additionally, the list of projects is provided as a way of complying with CEQA's requirements for meaningful disclosure.

#### **Response to Comment JUSTICE ALLIANCE 4.**

The commenter notes that the conceptual site plan (Exhibit 3.0-5) indicates that there are two offices proposed as part of the Project, but these are not mentioned in the Project description. The Project description in the Draft EIR will be revised to further clarify this issue, as described below. The office square footage is part of the total building square footage, and accounted for in the environmental analysis of the Project.

##### **Draft EIR page 3.0-13, under *Project Description***

The Project involves the development of a single 676,983 ft<sup>2</sup> distribution building within an approximately 34.54-acre property, with associated facilities and improvements such as offices, a guard booth, parking, bicycle racks, landscaping and detention basins. See Exhibit 3.0-5, Conceptual Site Plan and Exhibit 3.0-6, Conceptual Elevations.

Approximately 18,000 square feet of the total building area would include primary and secondary offices fronting Cedar Avenue.

The additional content merely clarifies the existing information provided, is not required for disclosure purposes, and does not constitute significant new information under CEQA or require recirculation under CEQA Guidelines Section 15088.5 (see Section 1.4 herein for additional discussion). Also see Response to Comment JUSTICE ALLIANCE 2.

#### **Response to Comment JUSTICE ALLIANCE 5.**

As the commenter stated, the Project site will have passenger vehicle and truck access via both Cedar Avenue and Jurupa Avenue. This is well illustrated in Exhibit 4.7-2 and 4.7-3. Accordingly, it is unclear why the commenter believes that access will only be permitted from Cedar Avenue. Passenger vehicle access points will be 30 feet wide and truck/passenger car access points will be 40 feet wide. This is demonstrated in the Bloomington Industrial Facility Traffic Impact Analysis (Draft EIR, Appendix F). In addition, minor text changes will be made in the EIR to clarify that truck access would be via both Cedar Avenue and Jurupa Avenue; see Section 3.0 *Errata to the Draft EIR* for changes. Lastly, the impact analysis considers the use of both Cedar Avenue and Jurupa Avenue for truck access. These changes merely clarifies the existing information provided, and does not constitute significant new information under CEQA or require recirculation under CEQA Guidelines Section 15088.5 (see Section 1.4 herein for additional discussion). Also see Response to Comment JUSTICE ALLIANCE 2.

**Response to Comment JUSTICE ALLIANCE 6.**

The comment states that although Draft EIR states that approval of Tentative Parcel Map (TPM) 19635 is necessary before the Project is approved, TPM 19635 was not made available in the Draft EIR for the public to review. The Tentative Parcel Map is available at the County Planning Department for review. For convenience, new Exhibit 3.0-8, Tentative Parcel Map is added to the Draft EIR; see Section 3.0 *Errata to the Draft EIR*. As indicated in the Draft EIR (see p. 3.0-21), approval of Tentative Parcel Map 19635 would combine the existing parcels into one lot. Also see, Exhibit 3.0-5 which better illustrates the distribution of features on the proposed parcel, and at an EIR scale.

The additional content merely clarifies the existing information provided, is not required for disclosure purposes, and does not constitute significant new information under CEQA or require recirculation under CEQA Guidelines Section 15088.5 (see Section 1.4 herein for additional discussion). Also see Response to Comment JUSTICE ALLIANCE 2.

**Response to Comment JUSTICE ALLIANCE 7.**

The comment states that abandoning the existing SBCFCD easement, and dedicating a new easement would also require to approval from SBCFCD. Additionally, the comment states that a map disclosing the location of the existing and proposed easements must be included.

The County notes that although SBCFCD is a separate legal entity, it is closely associated with the County, and shares the same governing board, the County Board of Supervisors. In addition, the EIR has been updated to include new Exhibit 3.0-7, Existing Parcels, which illustrates the location of the existing north-south SBCFCD easement; see Section 3.0 *Errata to the Draft EIR*. The description of the existing and proposed easement is generally described in the Draft EIR (p. 2.0-2) as follows:

The existing San Bernardino County Flood Control District (SBCFCD) parcels are linear parcels that bifurcate the middle of the Project site. These parcels are intended to support future flood control improvements associated with a railroad drainage master plan, to accept/convey drainage from the rail use to the north. This alignment would be abandoned in favor of one which would direct future flows east along the northern Project boundary and south along Cedar Avenue. The Project would dedicate the easement to SBCFCD to facilitate future drainage improvements.

The precise location would be determined in conjunction with SBCFCD.

**Response to Comment JUSTICE ALLIANCE 8.**

CEQA requires the discussion of cumulative impacts to reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the project-specific impacts. Rather, the discussion should be guided by the standards of practicality and reasonableness, and should focus on the cumulative impact to which the identified other projects contribute rather than the attributes of other projects which do not contribute to the cumulative. (CEQA Guidelines Section 15130 (a)).

The Bloomington Industrial Facility Traffic Impact Analysis (Draft EIR, Appendix F) follows all traffic engineering practices, and is also consistent with the premise for evaluation of cumulative projects presented above. The projects suggested by the commenter, are either too far from the Project to warrant consideration in the traffic impact analysis, or are not likely to contribute measurable traffic to any of the study area intersections. The Project study area is determined by the trip generation and trip distribution, and the Traffic Impact Analysis is not required to analyze intersections the project does not contribute traffic to. Similarly, the Traffic Impact Analysis does not consider *other projects* that would not contribute traffic to Project study intersections. For example, for the Ontario Colony Commerce Center, the closest impacted intersections to the Project is over 10 miles away, so there would not be any basis to consider such a project in the Traffic Impact Analysis.

At the time of preparation of the traffic impact analysis, cumulative projects and project study area were selected, in consultation with the County, based on the County guidelines, and the California Department of Transportation guidelines. Based on this guidance, analysis should be considered where a project is projected to contribute 50 or more vehicle trips to an arterial to arterial intersection (see page 3 of the County of San Bernardino Traffic Impact Study Guideline 2014), or where the project is projected to contribute 100 or more vehicle trips to a State Highway Facility intersection (see page 5 of the California Department of Transportation Guide for the Preparation of Traffic Impact Studies 2002). This approach, and facilities to be evaluated, has been verified based on discussions with the County Engineering Department. The amount of vehicle trips generated by the Project do not require any further analysis than what is provided in the Bloomington Industrial Facility Traffic Impact Analysis (Draft EIR, Appendix F). Therefore, the cumulative impacts analysis is appropriate and sufficient under CEQA.

#### **Response to Comment JUSTICE ALLIANCE 9.**

From a traffic engineering point of view, the relevant information for these other developments is provided in Table 4 (other development County identification number, land use, land use quantity, vehicle type, and trip generation), Figure 19 (other development location map), Figures 20 to 25 (other development trip distribution by zone) of the Bloomington Industrial Facility Traffic Impact Analysis (Draft EIR, Appendix F). Although, the other development information provided by jurisdictions often lacks details, the information obtained is sufficient for analysis purposes. Typically the closest cross streets, land use, and land use quantities are given. For additional information, each project may be looked up individually at the County Planning Department. All of the Project's technical studies are public information and a copy may be requested at the County Planning Department.

#### **Response to Comment JUSTICE ALLIANCE 10.**

The Project site is located in an area characterized by large-lot single family homes. As presented in Table 3.0-2 of Section 3.0, Project Description, in the Draft EIR, the Project site is surrounded on three sides by development on lands designated Bloomington/Single Residential-1 Acre Minimum-Additional Agriculture (BL/RS-1-AA). For the purposes of the Draft EIR, a residential land use developed on the minimum of 1 acre is considered a large-lot. Additionally, the comment is incorrect that such a characterization of the Project vicinity is intended to mislead readers concerning the amount of sensitive

receptors. As a point in clarification, potential air quality-related impacts to sensitive receptors were analyzed in the Draft EIR in accordance with the SCAQMD's AB 2588 and Rule 1402 Supplemental Guidelines (2016). According to the SCAQMD, in order "to identify the maximum impacted receptors (i.e., peak cancer risk and peak hazard indices) a grid spacing of 100 meters or less must be used" (see page 19). The evaluation of potential air quality-related impacts to sensitive receptors was prepared consistent with this SCAQMD recommendation. Therefore, all sensitive receptors potentially impacted by the Project were appropriately considered.

#### **Response to Comment JUSTICE ALLIANCE 11.**

The distances identified between the source of diesel particulate matter emissions and the nearest sensitive receptors in Table 1 of Section 4.1, Air Quality, Appendix B, *Health Risk Assessment*, of the Draft EIR are correct. Nonetheless, the air dispersion modeling for the Health Risk Assessment was performed using the U.S. EPA AERMOD dispersion model. AERMOD is a steady-state, multiple-source, Gaussian dispersion model designed for use with emission sources situated in terrain where ground elevations can exceed the stack heights of the emission sources (not a factor in this case). AERMOD requires hourly meteorological data consisting of wind vector, wind speed, temperature, stability class, and mixing height. In the case of the Project Health Risk Assessment, AERMOD interfaces with base maps obtained from Google Earth, which provides the actual distances used to compute potential health risk impacts. See Appendix B supplement herein for a map of the 24-hour diesel particulate matter concentration<sup>5</sup>. As previously stated, the SCAQMD states that in order "to identify the maximum impacted receptors (i.e., peak cancer risk and peak hazard indices) a grid spacing of 100 meters or less must be used." The dispersion modeling conducted for the Project Health Risk Assessment considered 447 receptors spanning approximately 100 square meters each. Pollutant concentrations were modeled for the sensitive receptors located between 10th Street south of the Project site, to West Valley Boulevard north of Interstate 10; and between Locust Avenue west of the Project site and Spruce Avenue east of the Project site. The modeling distances used to identify potential health risks at each of the two vicinity elementary schools is measured at the respective school property line, and impacts related to cancer risk from heavy trucks would be less than significant at each of the project vicinity school sites.

#### **Response to Comment JUSTICE ALLIANCE 12.**

Due to the nature of its use, a church is not considered a sensitive receptor in terms of air quality-related impacts. Land uses considered sensitive receptors include residences, schools, playgrounds, childcare centers, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes. While the Upland Indonesian Seventh Day Adventist Church, located approximately 10 feet to the north, may offer a vacation Bible school program in the summer season, this duration of programming is not robust enough to result in a potential health risk impact. As stated on page 17 of Appendix B, *Health Risk Assessment*, of Section 4.1 of the Draft EIR, current models and methodologies for conducting health risk assessments are associated with longer-term exposure periods of 9, 40, and 70 years, which do not correlate well with the temporary and highly variable nature of religious-oriented summer camps. Since

---

<sup>5</sup> See Appendix B herein for the Plot File of 1st High 24—hr. Values for Source Group: All.

camp sessions are typically short-term (lasting a few days to a few weeks), the children will not be exposed over longer-term exposure periods of 9, 40, and 70 years, which is the consideration for a health risk assessment.

**Response to Comment JUSTICE ALLIANCE 13.**

As stated on page 4.1-29 of Section 4.1 of the Draft EIR, the SCAQMD states that land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The SCAQMD does not identify construction activities as an action that instigates odor complaints. As stated on page 4.1-30, Construction-related odors would be short-term in nature (anticipated to last 10 months) and cease upon Project completion.

**Response to Comment JUSTICE ALLIANCE 14.**

The comment is incorrect that the air quality analysis assumes a maximum of 8 hours daily for construction. As a point in clarification, Table 4.1-8 of Section 4.1 of the Draft EIR is used to determine the maximum daily disturbed acreage during Project construction based on the amount of hours each piece of mobile construction equipment is projected to operate (i.e., emit pollutants) in a single day. For instance, Table 4.1-8 identifies 4 tractors and 3 dozers as operating for 8 complete hours during the site preparation phase of construction. This is a conservative assumption since typical operating cycles for these types of construction equipment may involve 1 or 2 minutes of full power operation, followed by 3 to 4 minutes at lower power settings, and punctuated by consistent intervals of no operation.

**Response to Comment JUSTICE ALLIANCE 15.**

The Draft EIR acknowledges that, in general, much of the new developments occurring in the Project vicinity are industrial in nature (Draft EIR, p. 4.5-8). The Draft EIR goes on to characterize the nature of industrial development near the Project site, as smaller operations comprised of 1 to 5 acres, and recognizes developments of similar size to the proposed Project more as being located along the I-10 and Slover corridor to the north and the Riverside Avenue corridor to the east. This trend is based on review of current and historic aerial photography, recent projects known to be developed, and recent applications for development. As provided in Section 4.7, a full list of cumulative impacts in the Project vicinity provide context as to the type of projects being built in the general area, a list that is dominated by industrial applications. Therefore, the content provided in the Draft EIR is accurate and appropriate.

The Draft EIR also recognizes the residential land uses surrounding the Project site, and the potential inconsistencies between these uses and the proposed use. It is for that reason that the Project includes a proposed General Plan Amendment to change the land use designation to Bloomington/Industrial (BL/IC). The Draft EIR refers to that proposed General Plan Amendment repeatedly throughout the EIR and analyzes the potential impacts associated with that change. (E.g., Draft EIR pp. 1.0-2, 2.0-1, 3.1-21, 4.5-8 through 4.5-10.) Ultimately, the Draft EIR concludes that there is a significant and unavoidable impact to land use insofar as “the proposed Project would not be consistent with the surrounding land uses.” (Draft



---

EIR p. 4.5-10.) Thus, contrary to the commenter's statement, the Draft EIR fully discloses all potential impacts associated with the Project.

The County notes that the statements indicating both a trend towards industrial and an existing predominantly residential area reflect that varied mix of land uses in the area characteristic of the Bloomington area. For instance, the Project site itself is a mixture of residential, agriculture and industrial uses in close proximity to each other, with multiple uses being characteristic on a single parcel.

**Response to Comment JUSTICE ALLIANCE 16.**

Setbacks are a common land use or zoning control to create distance between features, or land uses. Thus, the use of a setback is common and appropriate to provide buffers between uses. Both noise volumes and emission concentration diminish with distance from the source. The setback from Cedar Avenue is approximately 90 feet (measured from the property line to the building). In this case, the combined use of setbacks, fencing, and landscaping would promote some degree of buffer between uses.

The County notes that Cedar Avenue is an arterial road with an existing traffic load. The Project would appropriately make use of this existing arterial road for Project access.

**Response to Comment JUSTICE ALLIANCE 17.**

As suggested by the commenter, buffers to the south and west of the Project would be beneficial, and the Project already provides those buffers. Specifically, the setback to the west is approximately 80 feet, while the setback to the south is 380 feet from the property line at Jurupa Avenue (measured from the property line to the building). An 8' foot tall wall would be installed along the northern boundary of the Project site, and a portion of the western boundary of the Project site. Most of the property would feature landscaping around the Project perimeter.

There are approximately 55 loading docks on the north side of the building, and 55 loading docks on the south side of the building. The setback to the north is approximately 200 feet (measured from the property line to the building), and no homes would be oriented towards the north side of the building. The south side of the property has the greatest amount of setback totaling 380 feet, and featuring landscaping, detention basins, parking and drive aisles.

**Response to Comment JUSTICE ALLIANCE 18.**

The comment indicates there is a discrepancy on Table 4.5-2 in that both the County General Plan and the Bloomington Community Plan 2007 are cited as one source for the goals and policies outlined; however, they are two different documents. While these documents are distinct, the County also acknowledges that the Bloomington Community Plan is considered and treated by the County as part of the County's General Plan. Nonetheless, the EIR will be edited to include this clarification. The goals and policies included in Table 4.5-2 are from the Bloomington Community Plan 2007. The County General Plan has been removed from this specific table; see Section 3.0 Errata to the Draft EIR.

**Response to Comment JUSTICE ALLIANCE 19a.**

This commenter identifies goals and policies from the General Plan and the associated Bloomington Community Plan that are not specifically quoted in the EIR. An EIR need not consider each and every goal or policy in an agency's land use plans but should consider those that are the most relevant and applicable to the Project and jurisdiction. The Bloomington Community Plan is considered the most specific planning document focused on the Bloomington community, and is considered part of the General Plan. Thus, the EIR has appropriately focused on the applicable policies of the Bloomington Community Plan. Nonetheless, the new goals/policies raised by the commenter are briefly addressed below:

Objective, Goal or Policy		Consistency Analysis
<b>County General Plan</b>		
<b>V/LU 1</b>	Provide opportunities, where possible, for a rural lifestyle that preserves the unique character within suitable locations of the Valley Region.	Not applicable: The Project would neither contribute to nor conflict with this goal, which is more applicable to advanced planning activities such as parks and outdoor recreational areas, than a project-specific consideration.
<b>V/LU 1.1</b>	Where appropriate, support small scale agricultural uses and animal-raising activities that are established in association with rural residential uses to ensure the continuation of important lifestyle in the Valley communities of Bloomington and Muscoy by maintaining the Additional Agricultural Overlay as delineated on the Land Use Policy Map.	Not applicable: No small-scale agricultural uses or animal-raising activities are proposed. However, the Project would not preclude such activities near the Project site. Additionally, the Project proposes a General Plan Amendment that would remove the Agricultural Overlay from the Project site. This proposal is already identified and analyzed throughout the Draft EIR. (E.g., Draft EIR pp. 1.0-2, 2.0-1, 3.0-21, 4.5-8 through 4.5-10, and Appendix A, Initial Study pp. 19-20.)
<b>Bloomington Community Plan</b>		
<b>BL/LU 1</b>	Provide a mix of housing choices that support a range of lifestyles in the community, ranging from traditional urban neighborhoods to more "rural" neighborhoods.	Not applicable: No housing is associated with the Project. Additionally, the Project proposes a General Plan Amendment that would change the land use designation to allow for industrial uses. This proposal is already identified and analyzed throughout the Draft EIR. (E.g., Draft EIR pp. 1.0-2, 2.0-1, 3.0-21, 4.5-8 through 4.5-10.)

Objective, Goal or Policy	Consistency Analysis
<p>BL/LU 1.1 Require strict adherence to the Land Use Policy Map unless proposed changes are clearly demonstrated to be consistent with the community character.</p>	<p>Partially consistent: The Project does not adhere to the Land Use Policy Map, and is inconsistent with the community character on a highly localized level. On a Community level, moderate scale industrial development is becoming more prevalent to the north and east. Additionally, the Project proposes a General Plan Amendment that would change the land use designation to allow for industrial uses. This proposal is already identified and analyzed throughout the Draft EIR. (E.g., Draft EIR pp. 1.0-2, 2.0-1, 3.0-21, 4.5-8 through 4.5-10.)</p>
<p>BL/LU 2 Provide opportunities for a rural lifestyle that preserves the unique character within suitable locations (i.e. policy areas) of the Bloomington Community Plan.</p>	<p>Not applicable: The Project would neither contribute nor conflict with to this goal, which is more applicable advanced planning activities such as parks and outdoor recreational areas, than a project-specific consideration.</p>
<p>BL/LU 2.1 Support small scale agricultural uses and animal raising-activities that established in association with rural residential uses to ensure the continuation of an important lifestyle in the community plan area by maintaining the Additional Agricultural Overlay as delineated on the Land Use Policy Map.</p>	<p>Not applicable: No small-scale agricultural uses or animal-raising activities are proposed. However, the Project would not preclude such activities near the Project site. Additionally, and contrary to the commenter’s statement, the Project proposes a General Plan Amendment that would remove the Agricultural Overlay from the Project site. This proposal is already identified and analyzed throughout the Draft EIR (E.g., Draft EIR pp. 1.0-2, 2.0-1, 3.0-21, 4.5-8 through 4.5-10, Appendix A, Initial Study pp. 19-20.)</p>
<p>BL/LU 2.2 Utilizes the following “policy areas” to identify and define subareas within the Bloomington Community Plan requiring a minimum 1 acre parcel size; and those requiring 20,000 sq. ft. minimum parcel size.</p> <p>...</p>	<p>Consistent: The Project would meet the minimum parcel size requirement in that it proposes to merger 17 existing smaller parcels into one lot totaling approximately 34.5 acres. (Draft EIR pp. 1.0-2, 2.0-1, 3.0-21.)</p>
<p>BL/LU 2.3 In recognition of the community’s desire to maintain rural residential areas, projects within the AA Overlay that propose to increase the density of residential land uses shall be</p>	<p>No applicable: The Project has no housing component, and therefore, would not increase the density of residential land uses. Additionally, the Project proposes a General Plan Amendment that would change the land</p>

Objective, Goal or Policy	Consistency Analysis
considered only if the following findings can be made: ...	use designation to allow for industrial uses. This proposal is already identified and analyzed throughout the Draft EIR (E.g., Draft EIR pp. 1.0-2, 2.0-1, 3.0-21, 4.5-8 through 4.5-10.)

#### **Response to Comment JUSTICE ALLIANCE 19b.**

As indicated in Response to Comment Justice Alliance 19b above, V/LU 1 and V/LU1.1 are not applicable to the Project. It is appropriate for the EIR to focus on those policies that are clearly applicable to the action that is being considered, and as a result, policies that are not applicable are not typically evaluated and there is no viable reason why they should be here. The County disagrees with the commenter's assertion that the EIR is inadequate. Specifically, and contrary to the commenter's statement, the Project proposes a General Plan Amendment that would remove the Agricultural Overlay from the Project site. This proposal is already identified and analyzed throughout the Draft EIR. (E.g., Draft EIR pp. 1.0-2, 2.0-1, 3.0-21, 4.5-8 through 4.5-10, Appendix A, Initial Study pp. 19-20.) Accordingly, the Draft EIR fully meets CEQA's informational disclosure requirements.

#### **Response to Comment JUSTICE ALLIANCE 20.**

This comment indicates that sensitive receptors were not placed at their property lines nearest the Project site, and that generally the analysis "is skewed in presenting analysis that does not include those who will be most affected..."

This statement is not correct. Although Figure 4.6-1 represents the measurement locations and traffic modeling locations as-shown, the modeling of on-site noise impacts at adjacent uses was conducted so as to represent the nearest property boundaries (i.e., 60 feet from the nearest on-site construction activities, and so on). On-site noise impacts at the nearest noise-sensitive land uses (presented in Table 4.6-10 of the Draft EIR), which are the residential uses along Linden Avenue and other surrounding locations were in fact calculated at the nearest property boundaries, and no "buffering" was assumed or taken credit for in that regard.

The comment also implies that the noise measurement conducted at M4 (Zimmerman Elementary) was not valid because it was conducted at a time in the mid-afternoon (2:56 p.m. – 3:11 p.m.) when kindergartners are likely to already be out of school. The standard of the practice in conducting ambient community noise measurements is to conduct noise measurements during mid-day, off-peak hours (i.e., not during AM or PM peak-hours) as a representation of typical weekday conditions. In general (barring unusual or unforeseen events), the noise measurements thus collected are representative of the noise conditions throughout the day. This practice was followed for this Project and this location as well. The noise measurements at M4, and at the other measurement locations, are representative of typical noise measurements during a typical day, not only for the 3:00 pm hour.

In addition, the comment points out that no noise measurements or modeling was conducted for Crestmore Elementary. This statement is correct, but this is because Crestmore Elementary is located more than 700 feet away from the nearest side of the Project site, and any potential noise effects from Project-related traffic would be accounted for by the noise measurement and modeling receiver R4, located immediately to the south of the school, on the south side of Jurupa Avenue. Similarly, noise measurements or modeling was not specifically conducted at Kessler Park, located to the southwest of the Project site. However, just as with Crestmore Elementary, any potential effects would have been accounted for by adjacent receivers (in this case, receivers R1 or R3). Thus, because all noise impacts at the nearest sensitive receptors (R1, R3, and R4) are already less than significant for both construction and operation, noise levels at more distant sensitive receptors (including Crestmore Elementary and Kessler Park) would also be less than significant.

**Response to Comment JUSTICE ALLIANCE 21.**

The comment states that the noise impact study's estimated distance from the nearest residences to the center of the site (approximately 700 feet) and to the nearest side of the proposed structure (approximately 150 feet) is contradicted throughout the EIR. The comment then states that residents would be affected 24 hours per day and the analysis should be conservative and conducted at the residents' property lines.

Examination of the proposed site plan shows that these distances are accurate. The on-site operational noise analysis was conducted on a worst-case assumption based upon scaled distances from residential property lines, and the 24-hour operation of the facility was analyzed using the applicable noise standards. The noise analysis represents a conservative assessment of potential noise impacts. See also Response to Comment JUSTICE ALLIANCE 20, above.

**Response to Comment JUSTICE ALLIANCE 22a.**

The Bloomington Industrial Facility Traffic Impact Analysis (Draft EIR, Appendix F), shows that the Project is not projected to significantly impact the study area. The Level of Service standards put in place by the County are there to ensure that the transportation system remains safe and effective, ensuring adequate traffic movement, while preserving the rural character of the community. Therefore, the Project is consistent with Policy BL/C11.

**Response to Comment JUSTICE ALLIANCE 22b.**

The Bloomington Industrial Facility Traffic Impact Analysis (Draft EIR, Appendix F), shows that the study area intersections are projected to operate within acceptable Levels of Service (Level of Service D or better) in the future with the proposed Project. This is consistent with Policy BL/CI 1.1 because the Level of Service during the peak hours does not degrade the Level of Service past Level of Service D.

**Response to Comment JUSTICE ALLIANCE 22c.**

The Bloomington Industrial Facility Traffic Impact Analysis (Draft EIR, Appendix F), shows that the Project is not projected to significantly impact Slover Avenue or Valley Boulevard. Cedar Avenue (NS) at Slover Avenue (EW) is projected to operate at an acceptable Level of Service, and Cedar Avenue (NS) at Valley Boulevard (EW) is outside of the Project's study area. This is consistent with Policy BL/CI 1.2 because the project is not projected to significantly impact these intersections and the Level of Service is Level of Service D or better.

**Response to Comment JUSTICE ALLIANCE 22d.**

The Project is proposed to fully develop the west side of Cedar Avenue adjacent to the Project and the north side of Jurupa Avenue adjacent to the Project. Developing the roadways half-section immediately adjacent to the Project is typically required for new development; this includes the widening of the roadway and the addition of sidewalk, curb, and gutter. A development is not required to develop the opposite side of the roadway because that property is not generally a part of the Project site. Under CEQA a project is required to provide only feasible mitigation that has a nexus to a Project's potentially significant impacts and is roughly proportional to the size of the Project's impacts. (State CEQA Guidelines § 15126.4(a)(4).) It is considered unreasonable under CEQA to burden a development with acquiring land on the County's behalf and then to improve the opposing side of the street.

**Response to Comment JUSTICE ALLIANCE 22e.**

The Bloomington Industrial Facility Traffic Impact Analysis (Draft EIR, Appendix F), shows that the study area intersections are projected to operate within acceptable Levels of Service in the future with the proposed Project. The only potentially impacted intersections within this list is the Cedar Avenue/I-10 Freeway interchange. The traffic impact analysis specifically provides recommended improvements at the intersection of Cedar Avenue (NS) at the I-10 Freeway WB Ramps (EW). This improvements are needed with or without the proposed Bloomington Industrial Project, and are currently contained in the NEXUS fee program. The proposed Project is contributing to the NEXUS fee program. This is consistent with Policy BL/CI 1.5 because the Level of Service, with improvements, at the Cedar Avenue and I-10 Freeway interchange during the peak hours does not degrade the Level of Service past Level of Service D.

**Response to Comment JUSTICE ALLIANCE 22f.**

The planned Project is not proposing to modify the County Truck Routes. Based on the Bloomington Industrial Facility Truck Circulation Analysis (Draft EIR, Appendix F), there are no projected truck circulation issues. Also see Response to Comment JUSTICE ALLIANCE 8. The number of vehicle trips generated by the Project does not require any further analysis than what is provided in the Traffic Impact Analysis. This is consistent with Policy BL/CI 1.6 because the project is proposing to use the currently adopted truck route plan that is currently being enforced.

**Response to Comment JUSTICE ALLIANCE 23.**

The Project study area was selected, in consultation with the County, based on County guidelines and California Department of Transportation guidelines. Based on this guidance, analysis should be considered where a project is projected to contribute 50 or more vehicle trips to an arterial-to-arterial intersection, (see page 3 of the County of San Bernardino Traffic Impact Study Guidelines) or the project is projected to contribute 100 or more vehicle trips to a State Highway Facility (see page 5 of the California Department of Transportation Guide for the Preparation of Traffic Impact Studies). This approach and the facilities to be evaluated have been verified based on discussions with the County Engineering Department. The number of vehicle trips generated by the Project does not require any further analysis than what is provided in the Bloomington Industrial Facility Traffic Impact Analysis, and as a result, no evaluation of CA 60/Rubidoux Boulevard was required (Draft EIR, Appendix F). The project is projected to contribute approximately 28 vehicles to any one link of the SR 60 Freeway, and therefore, does not contribute sufficient trips to warrant evaluation of impacts to SR 60. In addition, the Draft EIR was provided to Caltrans, and Caltrans did not comment on the EIR.

**Response to Comment JUSTICE ALLIANCE 24.**

The County agrees that CEQA requires the evaluation of a reasonable range of potentially feasible alternatives that would avoid or reduce significant impact associated with the Project. (State CEQA Guidelines § 15126.6.) The Draft EIR (see Section 8.0) evaluated an alternative similar to the proposed Project, but at a reduced intensity of development, and therefore, with less Project-related traffic, air emissions, and noise. In addition, the Draft EIR evaluated a use that would remain commercial in nature (similar to the proposed Project), but would be more compatible with the existing residential uses. In addition, the Draft EIR evaluated the No Project Alternative, in the form of development consistent with the existing land use designation. Thus, the Draft EIR evaluates residential use consistent with the General Plan, industrial use at a reduced intensity compared to the Project, and a commercial use project, demonstrating a good faith effort in the evaluation of a reasonable range of alternatives.

**Response to Comment JUSTICE ALLIANCE 25.**

The comment asserts that Project objective 2 is unverifiable by the public or decision-makers, indicating that the new General Plan is not in effect, and the site-specific future designation is unknown.

Objective 2 states: Provide a new land use that is in support of the County's upcoming General Plan review to promote the Bloomington area.

The emphasis in this objective is a land use that would *promote the Bloomington area* and support the County's review of its General Plan, not the actual adoption of a General Plan that approves a specific designation. Accordingly, and contrary to the commenter's statement, this objective is not premised on any specific changes that the County may (or may not) make to its General Plan as part of a future update.



**Response to Comment JUSTICE ALLIANCE 26.**

Objective 5 states: Reduce existing blight and the opportunity for criminal activity and provide for a range of potential light industrial, manufacturing, and warehouse uses.

The comment asserts a lack of discussion regarding the elements of existing blight, opportunity for crime, and a range of potential light industrial, manufacturing, and warehouse uses. Evidence of blight is evident on a large majority of on-site structures due to aging, and neglect, and is best illustrated in the Cultural Resources Evaluation (BCR 2016; Draft EIR Appendix C). Large residential or mixed use lots in southern Bloomington, including properties on the project site, have been associated with illegal storage and unpermitted trucking activities, and generally considered a source of blight. The opportunity for crime relates to the easy, and unsecured parcel access that might be facilitated via the existing, graded flood control easement which bifurcates the Project site. Regarding the last element, the Project would potentially contribute to light industrial, manufacturing or warehouse uses, depending on the specific future tenant of the facility. Finally, it should be noted that numerous member of the local community agree that the Project will assist with the abatement of blight and crime issues. Please see Response to Comment Letter: Various (Form), below. In contrast, the proposed Project would provide a single cohesive land use with planned/permitted structures and activities, security fencing and landscaping. As a result, the project would provide a well-organized development, reduce blight, and also be expected to reduce potential for on-site criminal activity.

**Response to Comment JUSTICE ALLIANCE 27.**

Alternative 3 Commercial Use Alternative, if appropriately designed, has the potential to reduce blight, and the opportunity for criminal activity. It would not contribute to light industrial, manufacturing or warehouse uses. Thus, as acknowledged by the commenter, Alternative 3 – at best- would only partially meet this objective.

**Response to Comment JUSTICE ALLIANCE 28.**

As suggested, the Project includes a No Project Build Alternative that would develop the Project site consistent with the General Plan. Although, the No Project Alternative is always required under CEQA, in this instance it is a particularly meaningful alternative that meets a number of the commenters' suggestions.

As previously discussed, CEQA requires the evaluation of a reasonable range of alternatives; see Response to Comment JUSTICE ALLIANCE 24. Evaluation of every suggested alternative is not required. Each of the suggested alternatives offered by the commenter is briefly discussed below:

1. A project that does not require a GPA. This condition is represented in the No Project Alternative.
2. A reduced intensity alternative that reduced the scope of the project enough to avoid significant impacts to air quality. Any use that is inconsistent with General Plan Land use would by extension

be in conflict with the applicable air quality plan, and result in a significant impact to air quality under CEQA. Thus, only the No Project Alternative would represent this condition.

3. A project that complies with the existing General Plan Land Use designation. This condition is represented in the No Project Alternative.
4. A project design that eliminates the 40" driveway adjacent to Linden Avenue in order to further mitigate impacts to sensitive receptors along Linden Avenue. This is not a true project alternative, but a minor revision to the current project's internal circulation. We note that there is no site access via Linden Avenue, and this revision would not eliminate significant impacts associated with the proposed project. However, it may provide some benefit and reduce land use impacts. This condition is likely met by Alternative the Reduced Intensity Alternative, which would develop a smaller building so that alternative on-site circulation scenarios are probably feasible.
5. A project design with 100 foot-wide landscaped buffers along all sides of the building in order to mitigate urban blight, noise odors, and other impacts associated with the operation of a 24-hour industrial use. This condition is likely met by Alternative the Reduced Intensity Alternative, which would develop a smaller building and able to accommodate the suggested buffers.
6. A project that complies with the existing (-AA) additional agricultural overlay designation at the project site. This condition is represented in the No Project Alternative.

In summary, the above scenarios are sufficiently addressed in the existing alternatives analysis within Section 8.0 of the Draft EIR.

#### **Response to Comment JUSTICE ALLIANCE 29.**

The changes to the Draft EIR do not affect the overall conclusions of the environmental document, and instead represent changes to the Draft EIR that provide clarification, amplification and/or insignificant modifications, as needed as a result of public comments on the Draft EIR, or due to additional information received during the public review period. These clarifications and corrections do not warrant Draft EIR recirculation pursuant to CEQA Guidelines Section 15088.5. None of the changes or information provided in the comments or responses reflects a new significant environmental impact, a substantial increase in the severity of an environmental impact for which mitigation is not proposed, or a new feasible alternative or mitigation measure that would clearly lessen significant environmental impacts but is not adopted. In addition, the changes do not reflect a fundamentally flawed or conclusory Draft EIR.

Lastly, this comment serves as the conclusion to the letter and provides contact information. The County appreciates and values these comments during the Draft EIR participation process, and will add the commenter to the distribution list for future Project notices. Responses to specific comments are provided above; no further response is required.

**COMMENT LETTER: CRUZ BACA SEMBELLO (SEMBELLO)**

Comment Letter: SEMBELLO

*Cruz Baca Sembello  
c/o 14740 E. Clark St.  
Baldwin Park, CA 91706  
Email: cruzsembello@hotmail.com  
(626) 806-9583*

Feb. 6, 2016  
Kevin White, Senior Planner  
County of San Bernardino  
County Government Center  
386 N. Arrowhead Ave.  
San Bernardino, CA 92415-0817

**Re: Bloomington Industrial Facility Draft Environmental Impact Report**

Mr. White,

I am the property owner at 18484 Stallion Lane, Bloomington CA. I have been asked to give my support for the above project. I am wondering why there were no other follow up meetings or communication until now, since the initial meeting a year ago. Many of us stated our concerns, including an email I sent to you Mr. White, with my concerns, that was never answered. I will be in support, but only if the following points, that I previously mentioned in my email, are met.

- 1- No In or Out exits on Linden Street. There is a school there and safety is important.
- 2- Set back of buildings or walls. Walls close to street only invite "Graffiti". Landscaping, trees, etc. would also be needed.
- 3- Lights. If there are extra lights that will be installed they should not be intrusive to residents.

I will not be able to attend meeting of Bloomington MAC tonight. I was not aware this would be on agenda; notice was just brought to my attention on Monday, Feb 5. I would appreciate follow up to meeting.

Please feel free to contact me either by phone or email if any further questions or discussion.

Regards,

Cruz Baca Sembello  
(Computer Generated)

1  
2  
3  
4  
5

---

## **RESPONSE TO COMMENT LETTER: CRUZ BACA SEMBELLO (SEMBELLO)**

### **Response to Comment SEMBELLO 1.**

The comment indicates that there was no follow-up to concerns/questions provided during a meeting last year. Assuming that the commenter is referring to the CEQA scoping meeting, the purpose of the scoping meeting is to solicit feedback from the public on issues that should be addressed in the Draft EIR. (State CEQA Guidelines § 15083.) All comments received during the scoping meeting were summarized in the Draft EIR (see Draft EIR Appendix A, Memo from Michael Baker International dated 4/8/16) and fully considered and analyzed in the Draft EIR. The commenter indicates support of the Project if the concerns, summarized below, are met. This comment is duly noted. This comment does not identify a specific concern with the adequacy of the Draft EIR or raise an issue or comment specifically related to the Draft EIR's environmental analysis. Therefore, no further response is warranted. (State CEQA Guidelines §15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.) Responses to specific comments are provided below.

### **Response to Comment SEMBELLO 2.**

The commenter indicates that he does not want truck ingress or egress to occur on Linden Street due to the potential conflict with the adjacent school. The Draft EIR incorporates a discussion of the anticipated points of access for the proposed Project; refer to Section 4.7, Impact 4.7-4. The proposed Project originally had an access to Linden Street but based on discussions with the County Traffic Engineer, this access was removed. The proposed Project is not proposing any vehicular access to Linden Street. Refer to Exhibit 3.0-5, Conceptual Site Plan showing that ingress and egress points on Linden Avenue have been eliminated.

### **Response to Comment SEMBELLO 3.**

The comment indicates that building walls should be set back because walls close the street encourage graffiti. An 8' foot tall wall would be installed along the northern boundary of the Project site, and a portion of the western boundary of the Project site. The balance of the site would not have walls. Most of the property would feature landscaping around the Project perimeter. In addition, the building would be generally set-back from between 80 to 115 feet from the property line. Therefore, the Project design is consistent with the suggestion to set-back walls and discourage graffiti.

### **Response to Comment SEMBELLO 4.**

The commenter indicates that he does not want Project-related lighting to be intrusive to residents. The Draft EIR includes a discussion regarding lighting impacts and fully addresses this issue; see Draft EIR, page 6.0-3 for full discussion on lighting related impacts. As indicated in the Draft EIR, lighting throughout the site would be implemented in accordance with County design standards. County Ordinance No. 3900 regulates glare, outdoor lighting, and night sky protection. The Ordinance provides that commercial or industrial lighting shall be fully shielded in such a manner as to preclude light pollution or light trespass on any of the following: an abutting residential land use district; a residential lot; or public right-of-way.

The Project would provide shielded lighting sufficient for security and safety, without nuisance to the adjacent properties. Any lighting from the site would not interfere with on-coming traffic on adjacent roadways such as Linden Ave, Cedar Ave, and Jurupa Ave. A professionally prepared outdoor lighting plan has been submitted to, and is subject to the County's approval to confirm compliance with County standards (see Draft EIR Appendix J). Lighting direction and intensity would be developed to minimize impacts to roadways, adjacent neighbors, and minimize light pollution.

**Response to Comment SEMBELLO 5.**

This comment serves as the conclusion to the letter. The County appreciates and values the comments offered during the Draft EIR participation process. Additional meetings regarding the Project will be held by the County when it considers the Final EIR and Project. Please refer to the County's website from time to time at <http://cms.sbcounty.gov/lus/Planning/Environmental/Valley.aspx> for public notices regarding those meetings. Responses to specific comments are provided above; no further response is required.

COMMENT LETTER: VARIOUS (FORM)

Comment Letter: FORM

February 1, 2017

Via US Mail or Email [Kevin.White@lus.sbcounty.gov]

Kevin White, Senior Planner  
County of San Bernardino  
County Government Center  
385 N. Arrowhead Avenue  
San Bernardino, CA 92415-0187

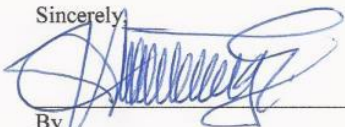
RE: Bloomington Industrial Facility Draft Environmental Impact Report

Dear Mr. White:

We, the undersigned, are writing to express our full support for the Bloomington Industrial Facility and to urge the County, as the lead agency for the environmental review and permitting processes, to approve the Project. The signatories to this letter are local residents living near the Project site, and we believe the Project will benefit our community in multiple ways.

The Project will bring much needed employment opportunities to the Bloomington area and generate long-term economic benefits over the coming years. Moreover, it will deter crime and clean up blight as well as pave the way for further capital investment that is badly needed in our community. Additionally, our neighborhood will benefit from the street improvements and landscaping planned around the Project site, thus improving traffic safety and bringing an attractive development into the area.

Given the significant benefits described above, we support the Bloomington Industrial Facility Project and look forward to welcoming this new development into our community.

Sincerely,  
  
By \_\_\_\_\_  
Israel Flores  
Name  
11250 MAPLE AVE  
Address Bloomington CA.

February \_\_, 2017

Via US Mail or Email [Kevin.White@lus.sbcounty.gov]

Kevin White, Senior Planner  
County of San Bernardino  
County Government Center  
385 N. Arrowhead Avenue  
San Bernardino, CA 92415-0187

RE: Bloomington Industrial Facility Draft Environmental Impact Report

Dear Mr. White:

We, the undersigned, are writing to express our full support for the Bloomington Industrial Facility and to urge the County, as the lead agency for the environmental review and permitting processes, to approve the Project. The signatories to this letter are local residents living near the Project site, and we believe the Project will benefit our community in multiple ways.

The Project will bring much needed employment opportunities to the Bloomington area and generate long-term economic benefits over the coming years. Moreover, it will deter crime and clean up blight as well as pave the way for further capital investment that is badly needed in our community. Additionally, our neighborhood will benefit from the street improvements and landscaping planned around the Project site, thus improving traffic safety and bringing an attractive development into the area.

Given the significant benefits described above, we support the Bloomington Industrial Facility Project and look forward to welcoming this new development into our community.

Sincerely,

  
By \_\_\_\_\_

Alejandro Martinez  
Name

18414 Surupa Ave. Bloomington  
Address

February \_\_, 2017

Via US Mail or Email [Kevin.White@lus.sbcounty.gov]

Kevin White, Senior Planner  
County of San Bernardino  
County Government Center  
385 N. Arrowhead Avenue  
San Bernardino, CA 92415-0187

RE: Bloomington Industrial Facility Draft Environmental Impact Report

Dear Mr. White:

We, the undersigned, are writing to express our full support for the Bloomington Industrial Facility and to urge the County, as the lead agency for the environmental review and permitting processes, to approve the Project. The signatories to this letter are local residents living near the Project site, and we believe the Project will benefit our community in multiple ways.

The Project will bring much needed employment opportunities to the Bloomington area and generate long-term economic benefits over the coming years. Moreover, it will deter crime and clean up blight as well as pave the way for further capital investment that is badly needed in our community. Additionally, our neighborhood will benefit from the street improvements and landscaping planned around the Project site, thus improving traffic safety and bringing an attractive development into the area.

Given the significant benefits described above, we support the Bloomington Industrial Facility Project and look forward to welcoming this new development into our community.

Sincerely,



By

MARTIN VILLASEÑOR

Name

11016 Maple Ave

Address

Bloomington



February \_\_\_, 2017

Via US Mail or Email [Kevin.White@lus.sbcounty.gov]

Kevin White, Senior Planner  
County of San Bernardino  
County Government Center  
385 N. Arrowhead Avenue  
San Bernardino, CA 92415-0187

RE: Bloomington Industrial Facility Draft Environmental Impact Report


Dear Mr. White:

We, the undersigned, are writing to express our full support for the Bloomington Industrial Facility and to urge the County, as the lead agency for the environmental review and permitting processes, to approve the Project. The signatories to this letter are local residents living near the Project site, and we believe the Project will benefit our community in multiple ways.

The Project will bring much needed employment opportunities to the Bloomington area and generate long-term economic benefits over the coming years. Moreover, it will deter crime and clean up blight as well as pave the way for further capital investment that is badly needed in our community. Additionally, our neighborhood will benefit from the street improvements and landscaping planned around the Project site, thus improving traffic safety and bringing an attractive development into the area.

Given the significant benefits described above, we support the Bloomington Industrial Facility Project and look forward to welcoming this new development into our community.

Sincerely,

  
\_\_\_\_\_

By

Michell Vega  
Name

18467 Stallion Ln.  
Address

February \_\_, 2017

Via US Mail or Email [Kevin.White@lus.sbcounty.gov]

Kevin White, Senior Planner  
County of San Bernardino  
County Government Center  
385 N. Arrowhead Avenue  
San Bernardino, CA 92415-0187

RE: Bloomington Industrial Facility Draft Environmental Impact Report

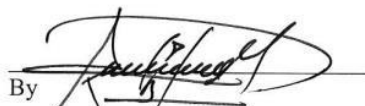
Dear Mr. White:

We, the undersigned, are writing to express our full support for the Bloomington Industrial Facility and to urge the County, as the lead agency for the environmental review and permitting processes, to approve the Project. The signatories to this letter are local residents living near the Project site, and we believe the Project will benefit our community in multiple ways.

The Project will bring much needed employment opportunities to the Bloomington area and generate long-term economic benefits over the coming years. Moreover, it will deter crime and clean up blight as well as pave the way for further capital investment that is badly needed in our community. Additionally, our neighborhood will benefit from the street improvements and landscaping planned around the Project site, thus improving traffic safety and bringing an attractive development into the area.

Given the significant benefits described above, we support the Bloomington Industrial Facility Project and look forward to welcoming this new development into our community.

Sincerely,

By 

RICARDO GRACIA  
Name

18355 STALLION LN  
Address

BLOOMINGTON CA 92316

February 1, 2017

Via US Mail or Email [Kevin.White@lus.sbcounty.gov]

Kevin White, Senior Planner  
County of San Bernardino  
County Government Center  
385 N. Arrowhead Avenue  
San Bernardino, CA 92415-0187

RE: Bloomington Industrial Facility Draft Environmental Impact Report

Dear Mr. White:

We, the undersigned, are writing to express our full support for the Bloomington Industrial Facility and to urge the County, as the lead agency for the environmental review and permitting processes, to approve the Project. The signatories to this letter are local residents living near the Project site, and we believe the Project will benefit our community in multiple ways.

The Project will bring much needed employment opportunities to the Bloomington area and generate long-term economic benefits over the coming years. Moreover, it will deter crime and clean up blight as well as pave the way for further capital investment that is badly needed in our community. Additionally, our neighborhood will benefit from the street improvements and landscaping planned around the Project site, thus improving traffic safety and bringing an attractive development into the area.

Given the significant benefits described above, we support the Bloomington Industrial Facility Project and look forward to welcoming this new development into our community.

Sincerely,

  
By

MANUELLA KURO  
Name

18448 Stallion Ln B. Lwnter. Ca  
Address

February 6, 2017

Via US Mail or Email [Kevin.White@lus.sbcounty.gov]

Kevin White, Senior Planner  
County of San Bernardino  
County Government Center  
385 N. Arrowhead Avenue  
San Bernardino, CA 92415-0187

RE: Bloomington Industrial Facility Draft Environmental Impact Report

Dear Mr. White:

We, the undersigned, are writing to express our full support for the Bloomington Industrial Facility and to urge the County, as the lead agency for the environmental review and permitting processes, to approve the Project. The signatories to this letter are local residents living near the Project site, and we believe the Project will benefit our community in multiple ways.

The Project will bring much needed employment opportunities to the Bloomington area and generate long-term economic benefits over the coming years. Moreover, it will deter crime and clean up blight as well as pave the way for further capital investment that is badly needed in our community. Additionally, our neighborhood will benefit from the street improvements and landscaping planned around the Project site, thus improving traffic safety and bringing an attractive development into the area.

Given the significant benefits described above, we support the Bloomington Industrial Facility Project and look forward to welcoming this new development into our community.

Sincerely,



By

Dorothy Cheryl Gardner

Name

18395 Stallion Ln

Address

Bloomington, CA

February \_\_, 2017

Via US Mail or Email [Kevin.White@lus.sbcounty.gov]

Kevin White, Senior Planner  
County of San Bernardino  
County Government Center  
385 N. Arrowhead Avenue  
San Bernardino, CA 92415-0187

RE: Bloomington Industrial Facility Draft Environmental Impact Report


Dear Mr. White:

We, the undersigned, are writing to express our full support for the Bloomington Industrial Facility and to urge the County, as the lead agency for the environmental review and permitting processes, to approve the Project. The signatories to this letter are local residents living near the Project site, and we believe the Project will benefit our community in multiple ways.

The Project will bring much needed employment opportunities to the Bloomington area and generate long-term economic benefits over the coming years. Moreover, it will deter crime and clean up blight as well as pave the way for further capital investment that is badly needed in our community. Additionally, our neighborhood will benefit from the street improvements and landscaping planned around the Project site, thus improving traffic safety and bringing an attractive development into the area.

Given the significant benefits described above, we support the Bloomington Industrial Facility Project and look forward to welcoming this new development into our community.

Sincerely,

  
By \_\_\_\_\_  
Name

18382 Jurupa Ave  
Address  
Bloomington CA 92316

February \_\_, 2017

Via US Mail or Email [Kevin.White@lus.sbcounty.gov]

Kevin White, Senior Planner  
County of San Bernardino  
County Government Center  
385 N. Arrowhead Avenue  
San Bernardino, CA 92415-0187

RE: Bloomington Industrial Facility Draft Environmental Impact Report

Dear Mr. White:

We, the undersigned, are writing to express our full support for the Bloomington Industrial Facility and to urge the County, as the lead agency for the environmental review and permitting processes, to approve the Project. The signatories to this letter are local residents living near the Project site, and we believe the Project will benefit our community in multiple ways.

The Project will bring much needed employment opportunities to the Bloomington area and generate long-term economic benefits over the coming years. Moreover, it will deter crime and clean up blight as well as pave the way for further capital investment that is badly needed in our community. Additionally, our neighborhood will benefit from the street improvements and landscaping planned around the Project site, thus improving traffic safety and bringing an attractive development into the area.

Given the significant benefits described above, we support the Bloomington Industrial Facility Project and look forward to welcoming this new development into our community.

Sincerely,



By



Name



Address

February 9, 2017

Via US Mail or Email [Kevin.White@lus.sbcounty.gov]

Kevin White, Senior Planner  
County of San Bernardino  
County Government Center  
385 N. Arrowhead Avenue  
San Bernardino, CA 92415-0187

RE: Bloomington Industrial Facility Draft Environmental Impact Report

Dear Mr. White:

We, the undersigned, are writing to express our full support for the Bloomington Industrial Facility and to urge the County, as the lead agency for the environmental review and permitting processes, to approve the Project. The signatories to this letter are local residents living near the Project site, and we believe the Project will benefit our community in multiple ways.

The Project will bring much needed employment opportunities to the Bloomington area and generate long-term economic benefits over the coming years. Moreover, it will deter crime and clean up blight as well as pave the way for further capital investment that is badly needed in our community. Additionally, our neighborhood will benefit from the street improvements and landscaping planned around the Project site, thus improving traffic safety and bringing an attractive development into the area.

Given the significant benefits described above, we support the Bloomington Industrial Facility Project and look forward to welcoming this new development into our community.

Sincerely,

HOWARD BAKER

By

Howard Baker

Name

1290 LINDEN AVE

Address

Bloomington

February 10, 2017

Via US Mail or Email [Kevin.White@lus.sbcounty.gov]

Kevin White, Senior Planner  
County of San Bernardino  
County Government Center  
385 N. Arrowhead Avenue  
San Bernardino, CA 92415-0187

RE: Bloomington Industrial Facility Draft Environmental Impact Report

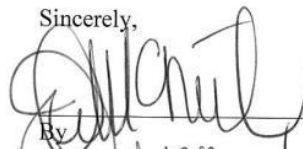
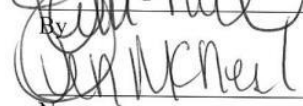
Dear Mr. White:

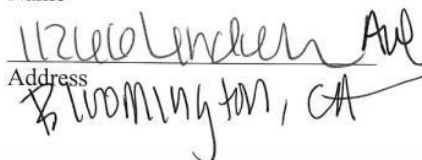
We, the undersigned, are writing to express our full support for the Bloomington Industrial Facility and to urge the County, as the lead agency for the environmental review and permitting processes, to approve the Project. The signatories to this letter are local residents living near the Project site, and we believe the Project will benefit our community in multiple ways.

The Project will bring much needed employment opportunities to the Bloomington area and generate long-term economic benefits over the coming years. Moreover, it will deter crime and clean up blight as well as pave the way for further capital investment that is badly needed in our community. Additionally, our neighborhood will benefit from the street improvements and landscaping planned around the Project site, thus improving traffic safety and bringing an attractive development into the area.

Given the significant benefits described above, we support the Bloomington Industrial Facility Project and look forward to welcoming this new development into our community.

Sincerely,

  
By \_\_\_\_\_  
  
Name

  
Address



February 1, 2017

Via US Mail or Email [Kevin.White@lus.sbcounty.gov]

Kevin White, Senior Planner  
County of San Bernardino  
County Government Center  
385 N. Arrowhead Avenue  
San Bernardino, CA 92415-0187

RE: Bloomington Industrial Facility Draft Environmental Impact Report

Dear Mr. White:

We, the undersigned, are writing to express our full support for the Bloomington Industrial Facility and to urge the County, as the lead agency for the environmental review and permitting processes, to approve the Project. The signatories to this letter are local residents living near the Project site, and we believe the Project will benefit our community in multiple ways.

The Project will bring much needed employment opportunities to the Bloomington area and generate long-term economic benefits over the coming years. Moreover, it will deter crime and clean up blight as well as pave the way for further capital investment that is badly needed in our community. Additionally, our neighborhood will benefit from the street improvements and landscaping planned around the Project site, thus improving traffic safety and bringing an attractive development into the area.

Given the significant benefits described above, we support the Bloomington Industrial Facility Project and look forward to welcoming this new development into our community.

Sincerely,

  
By \_\_\_\_\_

Cynthia Floriano  
Name

18354 Stallion Ln  
Address

February 6, 2017

Via US Mail or Email [Kevin.White@lus.sbcounty.gov]

Kevin White, Senior Planner  
County of San Bernardino  
County Government Center  
385 N. Arrowhead Avenue  
San Bernardino, CA 92415-0187

RE: Bloomington Industrial Facility Draft Environmental Impact Report

Dear Mr. White:

We, the undersigned, are writing to express our full support for the Bloomington Industrial Facility and to urge the County, as the lead agency for the environmental review and permitting processes, to approve the Project. The signatories to this letter are local residents living near the Project site, and we believe the Project will benefit our community in multiple ways.

The Project will bring much needed employment opportunities to the Bloomington area and generate long-term economic benefits over the coming years. Moreover, it will deter crime and clean up blight as well as pave the way for further capital investment that is badly needed in our community. Additionally, our neighborhood will benefit from the street improvements and landscaping planned around the Project site, thus improving traffic safety and bringing an attractive development into the area.

Given the significant benefits described above, we support the Bloomington Industrial Facility Project and look forward to welcoming this new development into our community.

Sincerely,

  
By

LONETTA GOSNEY  
Name

8394 Stallion Ln  
Address

February 7, 2017

Via US Mail or Email [Kevin.White@lus.sbcounty.gov]

Kevin White, Senior Planner  
County of San Bernardino  
County Government Center  
385 N. Arrowhead Avenue  
San Bernardino, CA 92415-0187

RE: Bloomington Industrial Facility Draft Environmental Impact Report

Dear Mr. White:

We, the undersigned, are writing to express our full support for the Bloomington Industrial Facility and to urge the County, as the lead agency for the environmental review and permitting processes, to approve the Project. The signatories to this letter are local residents living near the Project site, and we believe the Project will benefit our community in multiple ways.

The Project will bring much needed employment opportunities to the Bloomington area and generate long-term economic benefits over the coming years. Moreover, it will deter crime and clean up blight as well as pave the way for further capital investment that is badly needed in our community. Additionally, our neighborhood will benefit from the street improvements and landscaping planned around the Project site, thus improving traffic safety and bringing an attractive development into the area.

Given the significant benefits described above, we support the Bloomington Industrial Facility Project and look forward to welcoming this new development into our community.

Sincerely,

  
By

SALVADOR SANCHEZ  
Name

1181 MAPLE AVE BLOOMINGTON  
Address

February 1, 2017

Via US Mail or Email [Kevin.White@lus.sbcounty.gov]

Kevin White, Senior Planner  
County of San Bernardino  
County Government Center  
385 N. Arrowhead Avenue  
San Bernardino, CA 92415-0187

RE: Bloomington Industrial Facility Draft Environmental Impact Report

Dear Mr. White:

We, the undersigned, are writing to express our full support for the Bloomington Industrial Facility and to urge the County, as the lead agency for the environmental review and permitting processes, to approve the Project. The signatories to this letter are local residents living near the Project site, and we believe the Project will benefit our community in multiple ways.

The Project will bring much needed employment opportunities to the Bloomington area and generate long-term economic benefits over the coming years. Moreover, it will deter crime and clean up blight as well as pave the way for further capital investment that is badly needed in our community. Additionally, our neighborhood will benefit from the street improvements and landscaping planned around the Project site, thus improving traffic safety and bringing an attractive development into the area.

Given the significant benefits described above, we support the Bloomington Industrial Facility Project and look forward to welcoming this new development into our community.

Sincerely,



By

LEONARD J. HARRIS  
Name

11265 MAPLE AVE  
Address

BLOOMINGTON, CAL.

92316

---

## **RESPONSE TO COMMENT LETTER: VARIOUS (FORM)**

### **Preamble**

The County received 15 form letter comments generated by community members using pre-written comments, and adding their contact information. As a result, these comments are substantially similar in content, and a single response has been provided below. See Table 2.0-1 for a list of commenters. .

All of the comments appear to be from local residents.

### **Response to Comment FORM 1.**

This comment indicates support for the proposed Project. This comment does not identify a specific concern with the adequacy of the Draft EIR or raise an issue or comment specifically related to the Draft EIR's environmental analysis. Responses to specific comments are provided below; no further response is required. (State CEQA Guidelines §15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)

### 3.1 INTRODUCTION TO THE ERRATA

The Draft EIR for the Project, is hereby incorporated by reference as part of the Final EIR. Changes to the Draft EIR are further detailed below.

The changes to the Draft EIR do not affect the overall conclusions of the environmental document, and instead represent changes to the Draft EIR that provide clarification, amplification and/or insignificant modifications, as needed as a result of public comments on the Draft EIR, or due to additional information received during the public review period. These clarifications and corrections do not warrant Draft EIR recirculation pursuant to CEQA Guidelines Section 15088.5. None of the changes or information provided in the comments reflect a new significant environmental impact, a substantial increase in the severity of an environmental impact for which mitigation is not proposed, or a new feasible alternative or mitigation measure that would clearly lessen significant environmental impacts but is not adopted. In addition, the changes do not reflect a fundamentally flawed or conclusory Draft EIR.

Changes to the Draft EIR are listed by Section, page, paragraph, etc. to best guide the reader to the revision. Changes are identified as follows:

- Deletions are indicated by ~~strikeout text~~
- Additions are indicated by underline text

### 3.2 CHANGES TO THE DRAFT EIR

#### SECTION 1.0 EXECUTIVE SUMMARY

##### *Page 1.0-3, first paragraph*

Two detention basins would be located near the Project's southern boundary along Cedar Avenue and Jurupa Avenue. Landscaping would be provided and would represent approximately 15 percent of the site coverage. There would be a total of 272 automobile parking stalls constructed for employee parking with access from Cedar Avenue and Jurupa Avenue. All parking and site paving would be concrete and asphalt, and would represent approximately 38 percent of the site coverage. Truck access would be from Cedar Avenue and Jurupa Avenue, and the dockyard would include 138 trailer storage stalls, four (4) grade level ramps, and 110 dock high doors.

**Table 1.0-3 Environmental Impact Summary, page 1.0-13, last row**

Impact Question	Significance	Mitigation Measure
<i>Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?</i>	Less than significant with mitigation incorporated.	<b>MM BIO-1 and <del>BIO-2</del></b>

## SECTION 2.0 INTRODUCTION

### *Page 2.0-2, first complete paragraph*

Two detention basins would be located near the Project's southern boundary along Cedar Avenue and Jurupa Avenue. Landscaping would be provided and would represent approximately 15 percent of the site coverage. There would be a total of 272 automobile parking stalls constructed for employee parking with access from Cedar Avenue and Jurupa Avenue. All parking and site paving would be concrete and asphalt, and would represent approximately 38 percent of the site coverage. Truck access would be from Cedar Avenue and Jurupa Avenue, and the dockyard would include 138 trailer storage stalls, four (4) grade level ramps, and 110 dock high doors.

## SECTION 3.0 PROJECT DESCRIPTION

### *Page 3.0-9, first and second paragraph*

The Project site is comprised of 17 existing parcels, most of which are privately owned; however, four (4) of the parcels are publicly owned by SBCFCD (APN 0257- 081-07, 0257-091-12, and 0257-091-24), and one parcel is owned by the Bloomington Recreation and Parks District (Parks District) (APN 0257-091-15); see Exhibit 3.07, Existing Parcels. The SBCFCD parcels represent an approximately 25-foot wide easement that runs through the center of the Project site from the northern Project boundary, trending slightly easterly through to the southern Project boundary. There are no developed features associated with the easement, but the ownership preserves the parcel for future development of Drainage Master Plan facilities. The Parks District parcel is located at 18604 Jurupa Avenue, near the south-central portion of the Project site along Jurupa Avenue, and is approximately 0.4 acres in size, and is the site of an existing recreation center.

Approval of Tentative Parcel Map 19635 is proposed as part of the Project to combine the existing parcels into one lot; see Exhibit 3.0-8, Tentative Parcel Map. Table 3.0-1, Project Assessor Parcel Numbers, identifies the Assessor Parcel Number (APNs) that are included in the proposed Project site:

---

**Page 3.0-13, under Project Description**

The Project involves the development of a single 676,983 ft<sup>2</sup> distribution building within an approximately 34.54-acre property, with associated facilities and improvements such as offices, a guard booth, parking, bicycle racks, landscaping and detention basins. See Exhibit 3.0-5, Conceptual Site Plan and Exhibit 3.0-6, Conceptual Elevations.

Approximately 18,000 square feet of the total building area would include primary and secondary offices fronting Cedar Avenue.

There would be a total of 272 automobile parking stalls constructed for employee parking with access from Cedar Avenue and Jurupa Avenue. Parking and site paving would be concrete and asphalt, and would represent approximately 38 percent of the site coverage. Truck access would be from Cedar Avenue and Jurupa Avenue, and the dockyard would include 138 trailer storage stalls, four (4) grade level ramps, and 110 dock high doors.



Exhibit 3.0-7, Existing Parcels is added to the end of Section 3.0.

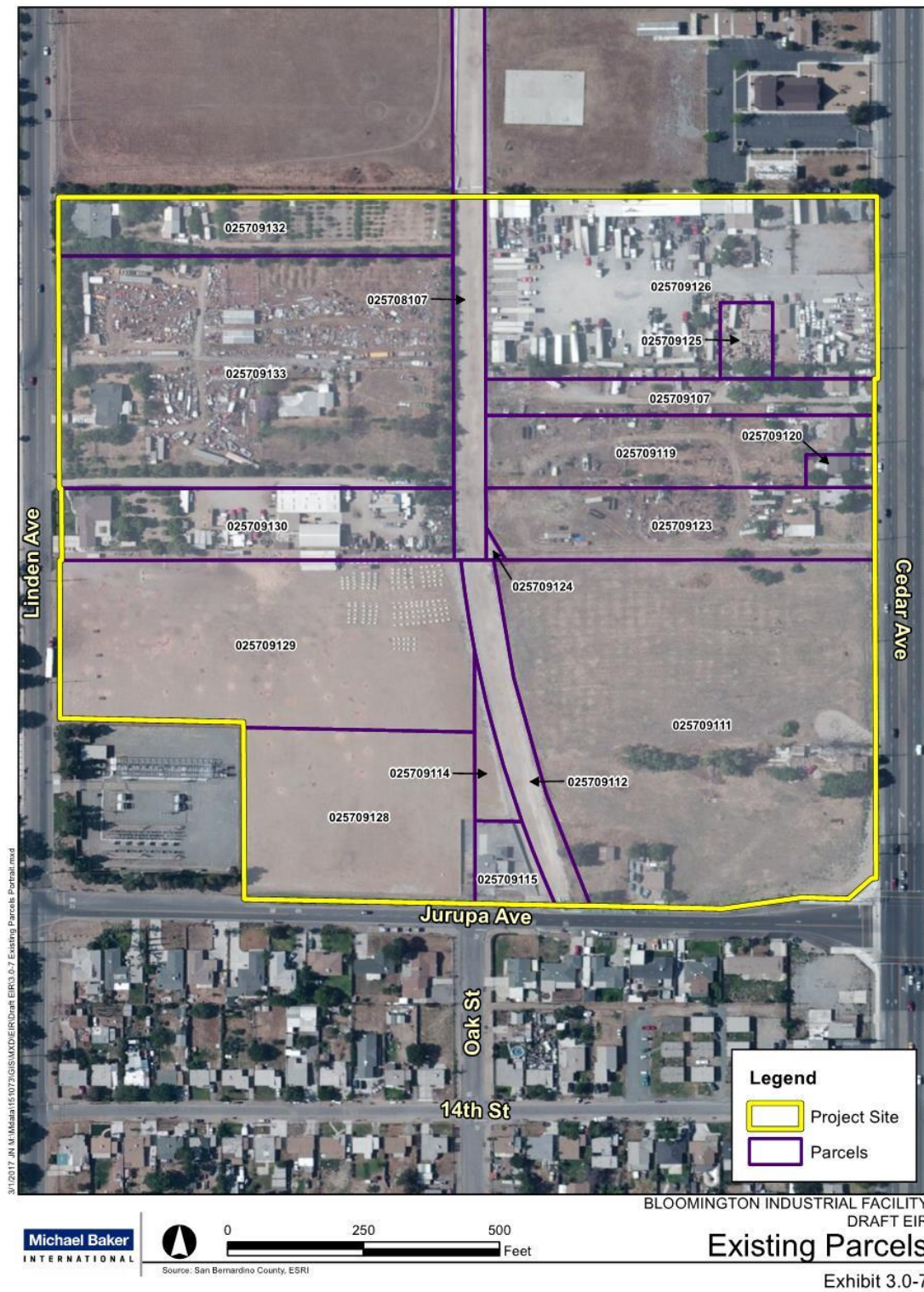
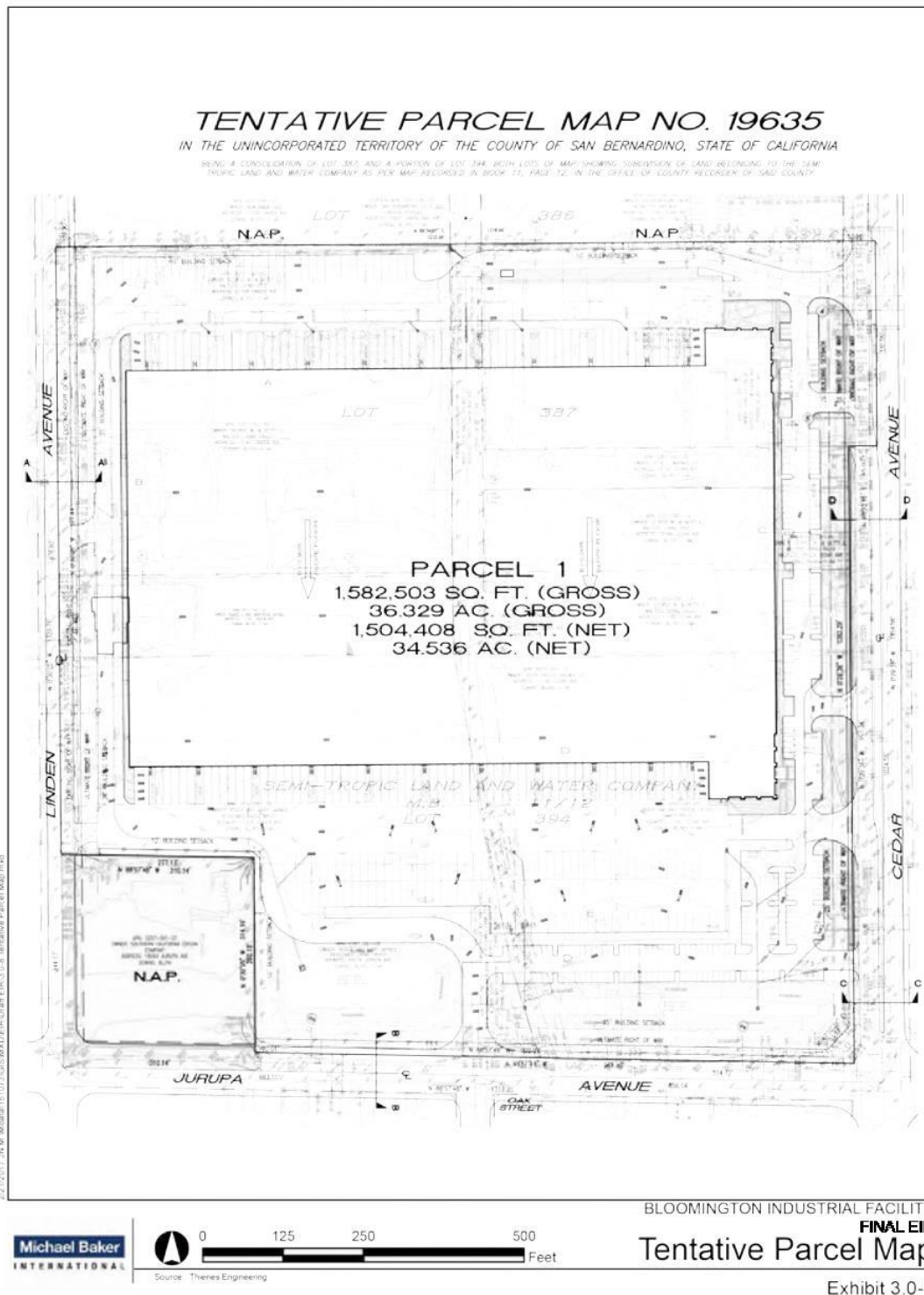


Exhibit 3.0-8, Tentative Parcel Map is added to end of Section 3.0.



## SECTION 4.1 AIR QUALITY

Appendix B has been supplemented to include content that was inadvertently left out of the Draft EIR Appendix.

## SECTION 4.5 LAND USE

### *Pages 4.5-9 and 4.5-10, Table 4.5-2, Land Use Policy Consistency Analysis*

Applicable Land Use Plan Objective, Goal, or Policy	Consistency Analysis
<b>County of San Bernardino General Plan Bloomington Community Plan (2007)</b>	
<b>Objective</b> Ensure that commercial and industrial development within the plan area is compatible with surrounding uses and meets the needs of local residents.	Inconsistent: The Project site is located in close proximity to a park, elementary school, and residences. Industrial development...

## SECTION 7.0 GROWTH INDUCING IMPACTS

### *Page 7.0-2, third paragraph*

Two detention basins would be located near the Project's southern boundary along Cedar Avenue and Jurupa Avenue. Landscaping would be provided and would represent approximately 15 percent of the site coverage. There would be a total of 272 automobile parking stalls constructed for employee parking with access from Cedar Avenue and Jurupa Avenue. All parking and site paving would be concrete and asphalt, and would represent approximately 38 percent of the site coverage. Truck access would be from Cedar Avenue and Jurupa Avenue, and the dockyard would include 138 trailer storage stalls, four (4) grade level ramps, and 110 dock high doors.

The content on the following pages supplements Appendix B to the Draft EIR.

# Attachment A

## Notice of Availability

---

### ATTACHMENT A

Notice of Availability of Draft EIR





San Bernardino County  
Land Use Services Department  
Planning Division

385 North Arrowhead Avenue, 1st Floor, San Bernardino, CA 92415  
Phone Number: (909) 387-8311 | Fax Number: (909) 387-3223

## Notice of Availability/Completion of a Draft Environmental Impact Report

**NOTICE IS HEREBY GIVEN** that the County of San Bernardino has prepared a Draft Environmental Impact Report (EIR), which is being distributed for public review pursuant to the California Public Resources Code and the California Environmental Quality Act Guidelines (CEQA Guidelines). The County of San Bernardino is the Lead Agency for the proposed project.

**Date:** December 23, 2016

**Project Title:** Bloomington Industrial Facility, State Clearinghouse Number: 2016031085

**To:** Responsible Agencies and Interested Parties

**Subject:** Notice of Availability/Completion of a Draft Environmental Impact Report (DEIR)

**Project Location:** The Project site is located in unincorporated San Bernardino County within the community of Bloomington. It is approximately 1.5 miles south of Interstate 10, immediately west of Cedar Avenue, north of Jurupa Avenue, and east of Linden Avenue, in between the cities of Rialto and Fontana, just north of the San Bernardino and Riverside County line.

**Project Description:** The proposed Project is comprised of the following elements: A general Plan Amendment to change the existing land use designation from Bloomington/Residential 1-acre minimum lot size-additional agricultural overly (BL/RS 1AA) and Bloomington/Institutional (BL/IN) to Bloomington/Industrial (BL/IC) on approximately 34.54 acres; the approval of Tentative Parcel Map 19635 to combine the existing 17 parcels into one lot on 34.54 acres; a conditional Use Permit (CUP) to construct a 676,983-square-foot (ft<sup>2</sup>) industrial warehouse building and associated facilities and improvements; design review of the building and related features; and abandoning the existing San Bernardino County Flood Control easement through the center of the project site, and the dedication of a new easement along the northeast and eastern boundaries of the site.



The Project would include the construction of a single 676,983 square foot distribution building within an approximately 34.54-acre property, with associated facilities and improvements such as a guard booth, parking, bicycle racks, landscaping and detention basins. Existing structures on the Project site would be demolished prior to construction.

Two detention basins would be located near the Project's southern boundary along Cedar Avenue and Jurupa Avenue. Landscaping would be provided and would represent approximately 15 percent of the site coverage. There would be approximately 272 automobile parking stalls constructed for employee parking with access from Cedar Avenue and Jurupa Avenue. All parking and site paving would be concrete and asphalt, and would represent approximately 38 percent of the site coverage. Truck access would be from Cedar Avenue, and the dockyard would include 138 trailer storage stalls, four (4) grade level ramps, and 110 dock high doors.

The existing San Bernardino County Flood Control District (SBCFCD) parcels are linear parcels that bifurcate the middle of the Project site. These parcels are intended to support future flood control improvements associated with a railroad drainage master plan, to accept/convey drainage from the rail use to the north. This alignment would be abandoned in favor of one which would direct future flows east along the northern Project boundary and south along Cedar Avenue. The Project would dedicate the easement to SBCFCD and install approximately 690 linear feet of underground storm drain pipe along the northern property line for future connection to the drainage facility when developed by SBCFCD.

Project construction is anticipated to occur over a duration of approximately 10 months, commencing in the first half of 2017 and the facility would be operational in 2018.

**Government Code Section 65962.5:** The Project would be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5; however, a Phase II Site Investigation concluded that there are no longer any environmental concerns and that the conditions on the Project site would not create significant hazard to the public or the environment.

**Environmental Topics Evaluated:** The Draft EIR examines the potential impacts generated by the proposed project in relation to the following environmental topics: air quality, cultural resources, greenhouse gas emissions, hazards and hazardous materials, land use, noise, transportation and circulation, growth inducing impacts, cumulative impacts and alternatives to the proposed project.

**Significant Environmental Impacts:** Based on the analysis in the Draft EIR, the Project would have significant and unavoidable direct and cumulative impacts to air quality and land use because the Project would: conflict with or obstruct implementation of the applicable air quality plan; conflict with the General Plan (Bloomington Community Plan).

**Reviewing Locations:**

The Draft EIR can be accessed on the County of San Bernardino Land Use Service's website at:

[http://www.sbcounty.gov/Uploads/lus/Environmental/westernrealco/Draft\\_EIR.pdf](http://www.sbcounty.gov/Uploads/lus/Environmental/westernrealco/Draft_EIR.pdf)

<http://www.sbcounty.gov/Uploads/lus/Environmental/westernrealco/Appendices.pdf>

Copies of the Draft EIR are available for review at the following locations during regular business hours:

- 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. Closed the following Mondays in observance of holidays: December 23, December 26, December 30, January 2, and January 16; call to confirm.
- Bloomington Branch Library, 18028 Valley Boulevard, Bloomington, CA 92316; (909) 820-0533; Library Hours: Monday – Wednesday 11:00 a.m. to 7:00 p.m., Thursday 10:00 a.m. to 6:00 p.m., Saturday 9:00 a.m. to 5:00 p.m. This branch is closed Friday and Sunday, and will be closed the following days in observance of holidays: December 23-26, December 31-January 2; and January 18; call to confirm.

**Public Comment Period:** The Draft EIR and its technical studies are available for the CEQA required 45-day public review and comment period from **December 23, 2016 through February 6, 2017**.

Written comments on the Draft EIR and technical studies must be received no later than 4:30 pm on February 6, 2017. Please submit comments to:

Kevin White, Senior Planner  
County of San Bernardino  
Land Use Services Department - Planning Division  
385 North Arrowhead Avenue, First Floor  
San Bernardino, CA 92415-0187  
kwhite@lud.sbcounty.gov

Please include the name, phone number, and address of the contact person in your response.

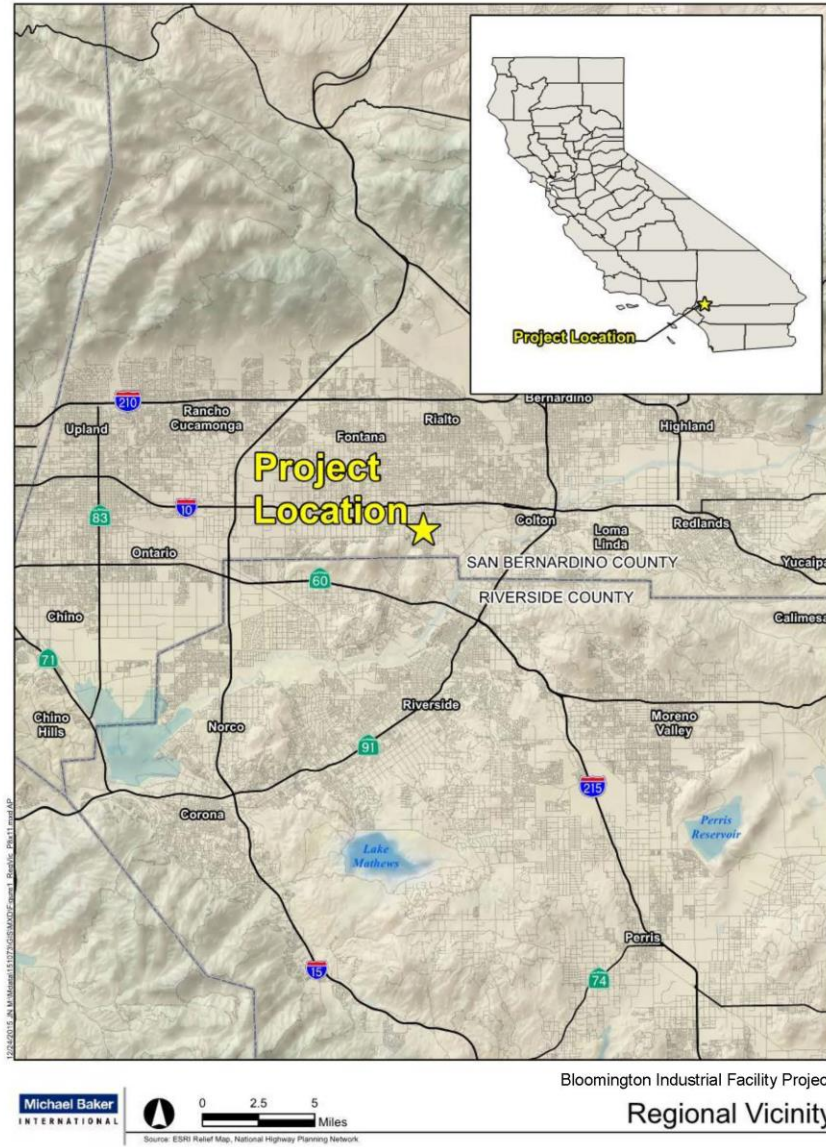
If you require additional information please contact Kevin White, Senior Planner, at (909) 387-3067.

Sincerely,



Kevin White, Senior Planner  
San Bernardino County

Page | 3



# Appendix B Supplement to the Draft EIR

---

## APPENDIX B

Supplemental information to Appendix B of the Draft EIR.