

EXHIBIT E

Memo to the Planning Commission Responding to the Comment Letter

1853

INTEROFFICE MEMO



DATE August 7, 2014 **PHONE** (909) 387-0235

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TO HONORABLE PLANNING COMMISSION

County of San Bernardino

SUBJECT **CONDITIONAL USE PERMIT FOR THE CONSTRUCTION OF A 708,240 SQUARE-FOOT INDUSTRIAL BUILDING WITH 20,000 SQUARE FEET OF OFFICE AREA TO BE USED AS A "HIGH CUBE" WAREHOUSE DISTRIBUTION FACILITY ON 38.37 ACRES, AND A TENTATIVE PARCEL MAP TO SUBDIVIDE 54.2 ACRES INTO TWO PARCELS; IN THE IC, COMMUNITY INDUSTRIAL LAND USE DISTRICT; BLOOMINGTON / FIFTH SUPERVISORIAL DISTRICT; PROJECT NO. P201300121/CF; APN: 0252-173-66, & 67.**

This Memorandum has been prepared to respond to the comments provided by the Law Firm of Johnson and Sedlack (Commenter) in its letter dated March 24, 2014 (Comment Letter). It concerns a proposed Conditional Use Permit (CUP) for the construction of a 708,240 square-foot industrial building with 20,000 square feet of office area to be used as "High Cube" warehouse distribution facility on 38.37 acres, with a Tentative Parcel Map (TPM) to subdivide 54.2 acres into two parcels in Bloomington. The CUP and TPM will be referred to collectively as "the Project." The applicant is Bloomington Industrial Property Owner, LLC.

The Comment Letter purports to speak on behalf of unnamed concerned area residents and also the Center for Community Action and Environmental Justice. Note that the Comment Letter consists of 24 pages of text but also includes 13 attachments, which collectively comprise hundreds of pages, copies of which have been provided to the Commission in a CD format. This response has been organized to mirror the outline of the Comment Letter.

General Comments

The General Comments section of the Comment Letter contains introductory claims regarding potential Project impacts associated with air quality/health risks, traffic, greenhouse gas emissions, noise, biological resources, hydrology/water quality, utilities, and regional and cumulative impacts. For these topics, more detailed and specific comments are contained subsequently in the Comment Letter. More explicit responses to these claims are found under these topical headings.

The General Comments section also contains claims that can be summarized into the following categories: 1) an EIR is essential for this Project because it will have a significant effect on the environment and an MND is inappropriate because there is a fair argument that the Project is likely to have a significant impact with respect to air quality/health risks, traffic, greenhouse gas emissions, noise, biological resources, hydrology/water quality, utilities, and regional/cumulative impacts; 2) none of the “significance” boxes on page 5 of the Initial Study are checked; 3) the conclusions contained in the Initial Study are conclusory (i.e., not based on substantial evidence) for example Aesthetics; 4) the mitigation measures contained in the Initial Study do not mitigate impacts to less than significant because they are vague, uncertain, unenforceable, and improperly deferred; and 5) the Project was not circulated to the State Clearinghouse even though the Project is locally and regionally significant. These claims are addressed as follows.

EIR is Required

Claim: The premise behind the Commenter’s claim that an EIR is required is that the full breadth of Project impacts were not accurately assessed in the Project’s Initial Study/Mitigated Negative Declaration and supporting technical studies.

Response: This is factually incorrect based on the analysis that is contained in the Initial Study and the supplemental analysis provided in the responses to the specific comments contained herein.

Furthermore, the claims made by Commenter in general are missing an important fact regarding the setting of the proposed Project’s impacts in terms of CEQA baseline conditions. Approximately 30 acres (80%) of the entire 36.7 acre proposed warehouse building site is occupied by part of an existing, operational, YRC Freight trucking facility and is therefore already covered by buildings, asphalt, ornamental landscaping, a detention basin, and other development amenities. The existing YRC Freight trucking facility contains 197,771 total square feet of building space located on the 36.7 acre proposed warehouse building site plus an additional 17.5 acres to the east for a total of 54.2 contiguous acres. Approximately 70 percent of the YRC building space will be demolished (138,171 of 197,771 total square feet) and used to construct the proposed high-cube warehouse building. The implications of the baseline condition in terms of land coverage is that approximately 85% of the overall 54.2 acre Project site (i.e., the 36.7-acre proposed warehouse building site and the 17.5 acres occupied by the existing 59,600 square feet of building area to remain) is already covered by buildings, asphalt, ornamental landscaping, detention basins, and other development amenities. The implications of this baseline condition in terms of air quality, greenhouse gas, noise, and traffic impacts is the Project’s environmental effects would be reduced by the existing air pollution emissions, greenhouse gas emissions, noise generation, and trip generation attributable to the existing 138,171 square feet of YRC Freight building area that would be removed as part of the Project.

Missing Checks on Checkboxes

Claim: This comment correctly notes that none of the boxes are checked on page 5 of the Initial Study.

Response: As clearly stated above the checkboxes on page 5 of the Initial Study, “The environmental factors checked below would be potentially affected by this Project, involving at least one impact that is a ‘Potentially Significant Impact’ as indicated by the checklist on the following pages.” These boxes are correctly left unmarked because the County has determined

that the proposed Project would result in no impact, a less than significant impact, or a less than significant impact with implementation of mitigation.

Initial Study is Conclusory

Claim: This comment claims, “[T]he conclusions in the IS/MND are unacceptably conclusory and not based on substantial evidence. For example, the entire aesthetics portion of the IS finds no or less than significant aesthetic impacts would result from the Project, but fails to support this finding with any evidence or citation to supporting documents.”

Response: Although this comment claims that the Initial Study contains additional topics for which conclusions are “conclusory,” this comment fails to directly state what other topics contain this supposed conclusory analysis. Also, nowhere else in the entire Comment Letter are any additional topics identified as containing conclusory analysis over and above the specific comments regarding air quality/health risks, traffic, greenhouse gas emissions, noise, biological resources, hydrology/water quality, utilities, and regional/cumulative impacts.

A specific comment regarding Aesthetics is made later in the Comment Letter, though in some ways briefer than this comment Regarding Aesthetics.

Mitigation Measures are Vague, Uncertain, Unenforceable, and Improperly Deferred

Claim: The Commenter claims the mitigation of potentially significant impacts from the Project are not mitigated to less than significant because the mitigation measures are vague, uncertain, and unenforceable and improperly deferred.

Response: The Initial Study contains seven mitigation measures associated with air quality, noise, and traffic impacts. Although the Commenter does not indicate which of the measures are inadequate, the adequacy of the seven measures is addressed as part of the responses to Commenter’s specific comments pertaining to these subjects.

Distribution to SCH

Claim: A project’s EIR or MND must be distributed to the State Clearinghouse if the project trips the size thresholds that define a project of statewide, regional, or areawide significance as set forth in CEQA Guidelines section 15206(b)(2)(E). The Commenter contends that this Project meets those thresholds.

Response: The project was distributed to the State Clearinghouse as project of statewide, regional, or areawide significance as set forth in the CEQA guidelines (SCH 2014021067). No comments were received from reviewing agencies at the conclusion of the 30-day comment period.

Aesthetics

Claim: *The Commenter claims that the IS/MND does not provide evidence to support the claim that impacts to aesthetics will be less than significant.*

Response: Contrary to this claim from the Commenter, the IS/MND finds: the Project is not located in a Scenic Corridor or near a state scenic highway; the Project site does not contain any trees, rock outcroppings, or historical buildings; the Project is consistent with the planned and existing visual character of the area; and the Project will comply with County Development Codes as well as provided a lighting plan as a condition of approval.

In addition to these findings, 85% of the Project site is currently developed with an operational YRC Freight trucking terminal. The proposed Project consists of the removal of approximately 70% of the existing YRC Freight trucking terminal building area and replacement of it with a 708,240 square foot “high cube” warehouse/distribution/logistics facility with support office and associated parking. Since the Project site currently contains existing structures associated with the existing truck terminal operation, implementation of the proposed Project would not result in the placement of new structures in an area where no structure previously existed. While the orientation and size of the buildings proposed as part of the Project would be different from that currently existing on the Project site and the Project would result in a net increase in building area of 570,069 square-feet ($708,240 - 138,171 = 570,069$), the placement and mass of structures on the Project site would result in industrial uses similar to the existing YRC Freight buildings that will be demolished. In addition, there are no locally defined scenic resources in the Project area. The Project also would have no adverse effect on scenic vistas because the Project site is currently developed and views north toward the San Bernardino Mountains are already partially obstructed to the extent that such views are considered important. Additionally, views north toward the San Bernardino Mountains are preserved through the north-south roadway network which maintains views of existing scenic vistas. Therefore, a less than significant impact related to this issue will occur and no mitigation is required.

Traffic/Transportation

Claim: *Traffic Comment 1: Traffic Study and associated traffic section of IS/MND is deficient; traffic impacts are potentially significant; IS/MND fails as an informational document.*

Response: Commenter’s general opening claims regarding the traffic analysis conducted for the proposed Project are clearly incorrect, as detailed on the responses to Commenter’s detailed comments below.

Claim: *Traffic Comment 2: Trip generation rates are flawed. Commenter claims that the high-cube warehouse trip generation rates and vehicle fleet mix (i.e., passenger car and truck percentage splits) used in the traffic study are flawed, and implies that the high-cube warehouse trip generation rates and vehicle fleet mix recommended by the South Coast Air Quality Management District (SCAQMD) staff in their “High-Cube Warehouse Truck Study: Technical Working Group” working document (March 8, 2102) more accurately reflect the estimated trips and vehicle splits for the proposed Project.*

Response: The Project traffic study used trip generation rates for high-cube warehouse from the most current version of the Institute of Transportation Engineers (ITE) *Trip Generation* (9th Edition, 2012), specifically Land Use Code 152, High-Cube Warehouse/Distribution Center. ITE is a professional body and *Trip Generation* is the most widely-recognized source for trip generation data from various types of land uses and is relied upon by jurisdictions across the country. Trip generation rates are based on survey data compiled from seventy (70) high-cube

warehouses in California, Florida, Georgia, Michigan, New Jersey, and Texas. The rates are periodically updated to include new building or land use types as they enter the market, to subdivide previous categories of building or land use types, with the result of providing greater specificity of definition. The ITE trip generation rates are intended to represent a national average and thus do not account for regional and local variations in building age, degree of automation, and the specific operational aspects taking place in high-cube warehouses. However, the following three local trip generation studies indicate that high-cube warehouses in the Inland Empire have significantly lower trip generation rates than those found in *Trip Generation*:

- NAIOP Trip Generation Study of High-Cube Warehouses (Kunzman Associates, Inc., 2011);
- Traffic Generated by the Skechers Warehouse (Parsons Brinckerhoff, 2012); and
- Vehicle Mix Assumption for High-Cube Warehouse, memorandum from Michael Lloyd to Eric Lewis (City of Moreno Valley 2013).

The following table summarizes the daily trip rates from *Trip Generation* and the three local trip generation surveys. As shown, *Trip Generation* is at a minimum 3% higher than any of the locally measured rates, and is nearly two times higher than some of the locally-measured rates. Based these facts, use of the *Trip Generation* already provides an overestimate of the trip generation for the proposed Project.

Source	Daily Trip Generation Rate	Ratio of ITE/Other
ITE 9 th Edition (2012)	1.680	Na
NAIOP Study (2011)	0.949	1.77
Sketchers Counts (2012)	0.567	2.96
City of Moreno Valley Survey (2013)	1.624	1.03

The SCAQMD March 2012 working document, on the other hand, is a work in progress and has not been thoroughly vetted by SCAQMD. In fact, this document reflects the opinions of SCAQMD staff that were presented to the Technical Working Group and has not been adopted by SCAQMD's Board. The March 2012 document is also out of date because it is based on ITE's *Trip Generation* 8th Edition, 2008. The most current document reflecting SCAQMD staff's opinions on this subject are reflected in the "High-Cube Warehouse Truck Study, Stakeholder Working Group, For Discussion Only" working document dated October 11, 2103 which is based on *Trip Generation* 9th Edition, 2012, and trip generation surveys of high-cube warehouses collected by SCAQMD in May 2013. As indicated on the title page, the 2013 working document is "for discussion only" indicating that it does not reflect an official SCQAMD position. Despite this, the daily trip generation rate for high-cube warehouses recommended by the SCQAMD July 2013 practice for air quality analyses (*California Emissions Estimator Model, Appendix E, Technical Source Documentation*, ENVIRON International Corporation and the California Air Districts, July 2013) is 2.59 trips per day – reflecting 95th percentile of the trip generation rate survey data from 68 different warehouse buildings, including 35 in California with 25 of those in the South Coast Air Basin.

In addition, numerous members of the Technical Working Group, Stakeholder Working Group, and traffic engineers in general disagree with SCQAMD's methodology for determining recommended trip generation rates for high-cube warehouses. The most glaring methodological error is that the trip generation rate recommended by SCAQMD staff in their 2012 and 2013 presentations is based on the 95th percentile of the high-cube warehouses that were surveyed. The SCAQMD recommended rate thus results in estimated trips for high-cube

warehouses equivalent to the busiest 5 percent of all the high-cube warehouses included in the survey study, significantly overestimating trips.

The SCAQMD March 2102 working document asserts that the number of daily vehicle trips for high-cube warehouses provided in *Trip Generation*, 8th Edition, may be understated due to the presence of rail spurs or potential for partial building vacancies at some survey locations based on their review of aerial imagery and oblique photography. However, these assertions were previously brought up by SCAQMD in their earlier white paper entitled *Large Warehouse and Distribution Center Trip Rates* (2011, month not provided). SCAQMD's white paper received negative review by the traffic engineering profession, as can be seen by examining the *Response to the South Coast Air Quality Management District White Paper* by Crain & Associates (December 2011). In their response, Crain & Associates identify critical flaws that were identified by SCAQMD's regarding low vacancies. SCAQMD indicates that the use of aerial photographs provide only "circumstantial evidence," resulting in conclusions regarding vacancies that are "difficult to verify," and correlating current photographs and vacancy levels to trip generation studies conducted in previous years is "difficult to validate." Despite this, the SCAQMD white paper, the 2012 working document, and the more current 2013 working document continue to recommend using a trip generation rate based on the 95th percentile of the surveyed trip generation rates.

The use of 95th percentile, as applied to the proposed Project, does not make sense as can be seen by examining the data shown in the figure presented on page 16 of the 2012 working document. As shown, there are eleven total surveyed sites ranging in size from 500 ksf to 900 ksf, a range that represents 200 ksf above and below the proposed Project and a reasonable sampling of high-cube warehouse sites that can be expected to have similar trip generation characteristics as the proposed Project. Of the eleven total, only two of the sites exhibited a trip generation rate above the *Trip Generation* 8th Edition rate of 1.44 trips per ksf and the two that exceed the rate do so just barely. As compared to the 9th Edition rate of 1.68 that was used in the proposed Project's traffic study, all eleven of the sampled sites are below 1.68. In summary, the trip generation rate used in the Project's traffic study exceeds the trip generation rates identified by SCAQMD staff in their 2012 working document.

Use of 95th percentile also results in an extremely conservative trip rate, and is not in conformance with standard traffic engineering trip generation estimating methodology as described in ITE's *Trip Generation Handbook*, 2nd Edition (2004). As discussed under "Guiding Principles" on page 9 of the *Trip Generation Handbook*, estimating the trip generation for a proposed development project should be based on the ITE's *Trip Generation* regression equations or weighted average values, or local data – not 95th percentile. In fact, the use of such a conservative trip rate would not only tend to overstate vehicle trips on a per site basis, but could lead to a significant overestimation of vehicle trips on a cumulative level. The 2012 SCAQMD working document recognizes this issue, which is why it acknowledges that when evaluating a large number of sites (more than 10), the ITE average rate of 1.44 (now 1.68 in *Trip Generation* 9th Edition) trips per thousand square feet.

Therefore, because use of the *Trip Generation*, 9th Edition, rate already provides an overestimate of the trip generation for the proposed Project, use of SCAQMD's recommended rates would overstate vehicle trips for the Project, and use of SCAQMD's recommended rates would significantly overestimate vehicle trips on a cumulative level, it is clear that use of ITE's *Trip Generation* trip generation rates for high-cube warehouse (Land Use Code 152, High-Cube Warehouse/Distribution Center) are the most appropriate rates to be utilized to calculate vehicle trips for the proposed Project.

Claim: *Traffic Comment 3: Study area incorrectly limited to only seven intersections/driveways.*

Response: As explained previously in Response to Traffic Comment 2, the trip generation rate suggested by Commenter's claim is incorrect. The Project's traffic study correctly used ITE's trip generation rate of 1.68 daily trips per thousand square feet. The intersection study area was determined based on the trips estimated for the Project, with intersections at which 50 or more Project trip additions selected for analysis. The 50 trip threshold for study area determination is used by the County because it reflects the minimum number of trips for there to be a noticeable change in the intersection and roadway levels of service. This methodology is quantifiable, accepted practice, and part of the County's traffic study guidelines.

Claim: *Traffic Comment 4: Study area incorrectly does not include roadway segments.*

Response: A traffic impact to a roadway segment rarely, if ever, will occur without an impact occurring at intersections along the same roadway segment or the start and end points of the same roadway segment. In addition, because the Project's trip generation is low (566 "raw" trips per day or 629 PCE trips per day), the Project will not cause a roadway segment impact and therefore the need to analyze roadway segments does not exist.

Claim: *Traffic Comment 5: Trip distribution is incorrect.*

Response: The travel patterns associated with the proposed high-cube warehouse will be heavily weighted to/from the adjacent Interstate 10 (I-10) freeway. For this reason, all trucks were assumed to access the site via I-10, with one half using Sierra and the other half using Cedar. Passenger vehicles were also assumed to access the site via I-10 as well as Slover Avenue, resulting in 40% to/from Slover Avenue to the west and 60% to/from Slover Avenue to the west. The assumptions of the trip distribution were determined to be adequate by reviewing Traffic and Planning Division staff.

Claim: *Traffic Comment 6: Figures in traffic study are mislabeled.*

Response: Commenter correctly notes minor errors in the figure labeling. This does not affect the traffic analysis and is therefore not a relevant comment. Nonetheless, the Figures have been corrected and are included at the end of these responses to comments.

Claim: *Traffic Comment 7: Project added traffic volumes underestimated.*

Response: As explained previously in Response to Traffic Comment 2, the trip generation rate suggested by Commenter's claim is incorrect. The Project's traffic study correctly used ITE's trip generation rate of 1.68 daily trips per thousand square feet.

Claim: *Traffic Comment 8: A General Plan Buildout analysis is required.*

Response: A General Plan buildout analysis is required by the County's traffic study guidelines for projects that propose a General Plan Amendment. The proposed Project is consistent with the County's General Plan and therefore does not include a General Plan Amendment. A General Plan buildout analysis is also conducted for large projects that have the potential to produce long-term traffic impacts. The Project's trip generation is low (566 "raw" trips per day or 629 PCE trips per day) and therefore the need to conduct a General Plan buildout analysis does not exist.

Claim: *Traffic Comment 9: Incorrect study area underestimates cumulative impacts.*

Response: As explained previously in Response to Traffic Comment 2, the trip generation rate suggested by Commenter's claim is incorrect. The Project's traffic study correctly used ITE's trip generation rate of 1.68 daily trips per thousand square feet. The intersection study area was determined based on the trips estimated for the Project, with intersections selected for analysis based upon the addition of 50 or more Project related trips. The 50 trip threshold for study area determination is used by the County because it reflects the minimum number of trips for there to be a noticeable change in the intersection and roadway levels of service. Cumulative impacts, therefore, have not been underestimated.

Claim: *Traffic Comment 10: Construction traffic impacts not addressed.*

Response: Construction of the proposed Project will have minimal, if any, effect on public roadways. In addition, the County of San Bernardino requires implementation of a Construction Traffic Management Plan for any roadway improvement or development projects that might disrupt traffic flow on public roadways.

Claim: *Traffic Comment 11: Additional mitigation for operational impacts may be necessary.*

Response: As explained previously in Response to Traffic Comment 2, the trip generation rate suggested by Commenter's claim is incorrect. The Project's traffic study correctly used ITE's trip generation rate of 1.68 daily trips per thousand square feet. Additional mitigation for operational impacts is not required because there are no additional operational impacts.

Claim: *Traffic Comment 12: Inadequate traffic study renders other related studies (Air Quality; Health Risk Assessment; Noise Study) deficient and inaccurate.*

Response: As explained previously in Response to Traffic Comment 2, the trip generation rate suggested by Commenter's claim is incorrect. The Project's traffic study correctly used ITE's trip generation rate of 1.68 daily trips per thousand square feet. The Project's traffic study is adequate, was prepared in accordance with the County's traffic study guidelines, and meets all generally accepted traffic engineering practices guiding the preparation of traffic studies. In addition, the Air Quality Study utilized a trip generation rate of 2.59 trips/ksf and 40% heavy trucks consistent with SCAQMD's recommendations for high-cube warehouse analyses.

Air Quality

Claim: *Construction air pollution emissions are significant.*

Response: The Commenter is confused regarding the California Emissions Estimator Model (CalEEMod) “Mitigated Construction” air pollution emissions calculations for the Project. The comment reflects a clear misunderstanding of the meaning behind CalEEMod’s “Mitigated Construction” air pollution emissions calculations. The CalEEMod tool allows a technician to estimate construction emissions assuming implementation of SCAQMD’s short-term construction regulations required by Rule 403 by turning on the “Mitigated Construction” feature within the tool. With this turned on, the resultant emissions emulate the emissions that would result from adherence to Rule 403 requirements. Because Rule 403 is a requirement, it truly is not CEQA mitigation because the practices contained in Rule 403 are implemented by construction projects throughout the air basin. Nonetheless, it is common practice for lead agencies throughout the air basin to put forth mitigation measures as part of CEQA documents implementing the required practices contained in Rule 403. In this light, the County Initial Study has correctly put forth the following four construction emissions mitigation measures:

- Mitigation Measure III-2: AQ-Dust Control Plan. Requires that the Project developer prepare a Project Dust Control Plan, and provisions requiring that all Project contractors adhere to it.
- Mitigation Measure III-3: AQ-Construction Mitigation. Requires that the Project developer include specified provisions in their construction contracts to reduce construction vehicle and construction equipment air pollution emissions.
- Mitigation Measure III-4: AQ-Coating Restriction Plan. Requires that the Project developer prepare a Coating Restriction Plan, to limit use of architectural coatings to application methods and types consistent with SCQAMD Rule 1113.
- Mitigation Measure III-5: AQ-Installation. Requires that the Project developer provide evidence that the Dust Control Plan and Coating Restriction Plan are implemented and followed.

With implementation of these mitigation measures, which in turn implement the construction air pollution emissions reduction requirements in compliance with Rules 403 and 1113, the proposed Project’s construction emissions estimates will emulate the “Mitigated Construction” emissions from CalEEMod. With implementation of these measures, impacts are less than significant as found in the Initial Study and none of the additional construction mitigation measures on pages 7 to 10 of the Comment Letter are needed.

The Commenter is incorrect regarding the use of construction localized significance thresholds (LSTs) lookup table values for the proposed Project. Although SCAQMD recommends that air dispersion modeling be used to determine the significance of localized impacts from large projects, the use of construction LST lookup tables for large projects actually overstates potential impacts. This is because the look up tables were developed by SCAQMD based on construction air pollution emissions surveyed at small sites under construction. The resulting tables, therefore, reflect pollution concentrations generated from a small area being graded, with the resulting concentration of pollution measured immediately off-site much higher than for a large area being graded. This is because the same level of dust generated on a large site would disperse and have a lower pollution concentration once it reaches the project boundary, provided the large project is not very long or otherwise irregularly shaped such that the pollution source would be closer to the project boundary than was modeled by SCQAMD when they created the lookup tables. For this reason, the findings in the Initial Study that construction LST impacts are less than significant are correct.

The Commenter incorrectly claims that the Initial Study "... presumes grading would be unnecessary for the most part since the Project has been previously graded. However, the south-central portion of the site is currently in use a detention basin so that some grading and potentially the import of soils to raise that portion of the site will likely be needed. The IS/MND fails to address this issue." The south-central portion of the site is not a detention basin. In fact, the south-central portion of the site is an unpaved area used by YRC Freight for truck and trailer parking. This area of the site, together with the rest of the site, will be mass graded. All soils will be balanced on the site.

Claim: *Operational air pollution emissions are significant.*

Response: The Commenter incorrectly claims that the "...operational impacts of the Project need to be reevaluated accounting for the substantial understatement of trips and truck trips in the traffic study." In fact, the Air Quality Study utilized a trip generation rate of 2.59 trips/ksf and 40% heavy trucks consistent with SCAQMD's recommendations for high-cube warehouse analyses. This can be clearly seen on the first page of the CalEEMod output sheets, all of which are included in the Appendix to the Air Quality Study prepared for the Project.

The Commenter incorrectly claims "Ambient air quality at the Project site often exceeds state or federal standards for O₃, PM_{2.5}, and PM₁₀, and the Project will likely result in increases above these exceedances regionally and locally." In fact, because Ambient Air Quality Standards (AAQSs) are oriented towards air pollution levels at a regional level (with the possible exception of CO, but there has not been a measured CO state or federal exceedance in the Air Basin since 2001), it is virtually impossible for a single development project to cause an exceedance of either a state or federal AAQS.

The Commenter is incorrect regarding the use of operational LST lookup table values for the proposed Project, for the same reasons described above for the construction LST lookup tables.

The Commenter incorrectly claims that the "...cumulative impact discussion in the air quality analysis is deficient and fails to at all quantify this Project's predicted cumulative effects." Cumulative air quality impacts rarely, if ever, occur. This is because cumulative air pollution emissions are assessed using the SCAQMD's LST procedures for short-term construction and long-term operational impact assessment. LST impacts affect the immediate, localized, area surrounding a project. Comingling of a project and cumulative project construction emissions does not occur when the two projects are on either sides of a receptor site. This is because at most the prevailing winds would blow the emissions from only of one of the projects towards a receptor site. Emissions from a project and a cumulative project aligned in a row, or in series, next to a receptor could intermingle, but the air pollution concentration of the far side generator would drop to a point of negligibility.

The Commenter claims "...the air quality analysis finds the Project would exacerbate non-attainment of air quality standards in the Basin and contribute to adverse cumulative air quality impacts. (Air Quality analysis p. 56.)" However, as also found on page 56 of the Air Quality Study, the Project's cumulative impacts to air quality standards are considered to be less than significant because emissions are less than the thresholds.

The Commenter claims "Reliance on the AQMP for projections of cumulative impacts is inappropriate in determining the Project's cumulative air quality impact locally." It is not clear what this comment is attempting to point out. Neither the Air Quality Study nor the IS rely on the

AQMP for determination of local cumulative impacts. The comment appears to confuse several concepts. As described above, cumulative impact assessment is conducted using the SCAQMD's LST procedures for short-term construction and long-term operational impact assessment. The Project's construction and operational LST impacts were determined to be less than significant.

The Commenter correctly notes that IS Mitigation Measures III-1, III-2, and III-3 restate existing regulations. As explained previously, it is common practice for lead agencies throughout the Air Basin to put forth mitigation measures as part of CEQA documents implementing the required practices contained in Rule 403. In this light, the County Initial Study has correctly put forth Mitigation Measures III-1 through III-5 to implement SCAQMD recommended practices.

The Commenter claims "As the Project will result in significant construction and operational impacts not disclosed or adequately mitigated in the IS/MND, an EIR is absolutely needed to evaluate Project air quality effect." The comment goes on and claims a list of 68 construction-related and 61 operation-related mitigation measures that should be added as mitigation measures for the Project. For the reasons enumerated above, the Project's construction and operational air pollution emissions have been properly estimated, associated construction and operational emissions impacts are rendered less than significant with mitigation, and the operational impacts were determined to be less than significant without the need for mitigation. No further mitigation is needed and an EIR need not be prepared.

Claim: *Diesel health risks associated with the Project are significant. The Commenter claims "The IS/MND utterly fails to adequately disclose and assess health risk impacts as the health risk portion of the air quality analysis relies on the deficient traffic study."*

Response: As stated previously in the response to comments on the Air Quality Study, the Air Quality Study as well as the health risk analysis contained in it utilized a trip generation rate of 2.59 trips/ksf and 40% heavy trucks consistent with SCAQMD's recommendations for high-cube warehouse analyses. This can be clearly seen on the first page of the CalEEMod output sheets, all of which are included in the Appendix to the Air Quality Study prepared for the Project.

Claim: *HRA Comment 2: Need to evaluate impacts from Project trucks at off-site locations/truck routes.*

Response: The HRA does include off-site locations/truck routes. As described in the Air Quality report on page 42: "Toxic pollutants from roadways are modeled as a series of volume sources. An approximate representation of the roadway was obtained by placing a number of volume sources at equal intervals along the roads on site and far enough off site to characterize the emissions at the sensitive receptors near the Project site."

Claim: *HRA Comment 3: HRA assumes 10 minutes idling, it should be 15 minutes.*

Response: State regulations limit idling to no more than 5 minutes per stop.¹ To be conservative the HRA assumed that each truck might idle two different times during each trip while on the Project site. The commenter provides no substantial evidence supporting the assertion that 15 minutes idling should be used.

Claim: *HRA Comment 4: Need to evaluate cumulative health risks along truck routes.*

Response: The proposed warehouse Project is consistent with the County's General Plan land use for the site and long-term air quality emissions for the site have been accounted for in SCQAMD's Air Quality Management Plan. In addition, the proposed Project's impacts are only those impacts that exceed impacts from existing baseline conditions attributable to the existing 138,171 square feet of YRC Freight building area that would be removed as part of the proposed Project. Furthermore, roadway corridor health risk assessments are regional in nature and not conducted for development projects. For these reasons, a roadway corridor health risk assessments is not warranted.

The Commenter claims "The following mitigation measures should be incorporated to reduce the health risk impacts of the Project:" The Comment Letter then lists 14 additional mitigation measures to further reduce the health risks associated with the proposed Project. However, as enumerated above, the Project's health risk related impacts have been properly estimated, the health risks are less than the threshold of significance, and no mitigation measures are required. No further mitigation is needed.

Green House Gas Emissions

Claim: *The Commenter claims that the operational emissions substantially underestimate mobile source emissions. The Commenter also claims that Green House Gas (GHG) emissions be reevaluated based on unmitigated construction emissions.*

Response: The IS/MND claims that short-term construction emissions for the Project were estimated using CalEEMod output tables listed as "Mitigated Construction." As explained in the responses to comments made on the Air Quality Study, the "Mitigated Construction" calculations reflect estimated emissions that would result from adherence to Rule 403 construction requirements. Because Rule 403 are required construction practices, it is has become common practice for lead agencies throughout the Air Basin to put forth mitigation measures as part of CEQA documents implementing the required practices contained in Rule 403. In this light, the County Initial Study has correctly put forth four construction emissions mitigation measures (see pages 46-48 of the Initial Study) which ensure that the existing regulations from Rule 403 are implemented. With implementation of these measures, construction emissions are less than the threshold of significance and no further mitigation is required.

The Commenter claims that the IS/MND should determine if the Project is consistent with the County's Greenhouse Gas Emission Reduction Plan based on the new Title 24 standards. According to CEQA regarding GHG impacts, a project is deemed to have a less than significant impact associated with GHGs if "the project complies with the requirements in a previously adopted plan or mitigation under specified circumstances."² The proposed Project includes

¹ Title 13, California Code of Regulations, Section 2485. *Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling.*

² 2014 CEQA Statute and Guidelines, Section 15183.5.

various Project design features that total 100 points, the required number of points needed for a project to be determined consistent with the County's Greenhouse Gas Emission Reduction Plan. No further analysis of this issue is required.

Biological Resources

Claim: *The Commenter indicates that the Project would result in potentially significant and an unmitigated impact to bird species protected by the Migratory Bird Treaty Act (MBTA) and/or CDFG Code Sections 3503-3801.*

Response: The Commenter is correct that the Biological Resources Report found impacts to birds protected under the previously mentioned acts. However, the Commenter is incorrect that a specific mitigation measure requiring pre-construction surveys is required. Pre-construction nesting surveys are required by the MBTA and CDFG, therefore, a mitigation measure requiring pre-construction nesting surveys would be redundant and not required by CEQA. A condition of approval is proposed to formally state the applicants responsibility to perform such surveys.

Cultural Resources

Claim: *The Commenter claims that the IS/MND does not provide evidence to support the claim that impacts to cultural resources will be less than significant and that a cultural resources monitor should be required during Project construction to divert construction equipment should potential cultural resources be unearthed.*

Response: The IS/MND states that no cultural resources have been identified on the site and a condition of approval shall be added to the Project that requires the developer to contact the County Museum for determination of the appropriate responses in the unlikely event that potential archaeological or paleontological resources are unearthed during Project construction. In addition, a monitor is not required on site during construction due to the very low probability of cultural resources being found on the site due to the extensive grading and recompression of the site during the previous construction of the YRC Freight facility including the undeveloped areas near Slover Avenue.

Hydrology/Water Quality

Claim: *The Commenter indicates that the Preliminary Drainage Report and Preliminary Water Quality Management Plan were not included with the IS/MND.*

Response: The Commenter is correct that the Drainage Report and Water Quality Management Plan were not included in the IS/MND. However, both reports are available at the County of San Bernardino Government Center in the Land Use Services Department for anyone interested in reviewing them (385 North Arrowhead Avenue First Floor, San Bernardino CA, 92415).

Claim: *The Commenter also claims that there is no evidence that the septic system will be adequate to service the Project.*

Response: It should be noted that septic systems are not addressed in the Hydrology and Water Quality Section of CEQA. Septic Systems are typically addressed in the Geology and

Soils Section of CEQA (see Section VI.(e), Geology and Soils, in the County's Initial Study). However, to maintain the organization of the Commenter's letter, septic systems will be addressed in this section. The proposed Project would be serviced by the existing septic system that is being used for the existing warehouse. Septic systems can represent a concern by providing a potential conduit to the subsurface soils if improper disposal of hazardous materials occurs in restrooms sinks or toilets. However, based on the absence of any indications of past releases or reasons for speculating that improper disposal of hazardous materials would occur as part of the Project, no subsurface investigation of the septic systems is required at this time. In addition, the proposed Project is only expected to marginally increase the number of employees on the Project site. Therefore, development of the proposed Project is not expected to require a new or expanded septic or alternative waste disposal system to accommodate the expected wastewater generation. In addition, the IS/MND states that the septic system will be permitted through the Environmental Health Service Division of the County and reviewed by the Regional Water Quality Control Board. These permit systems would keep impacts related to septic systems less than significant.

Claim: *The Commenter claims that the IS/MND does not provide evidence to support the claim that impacts to groundwater recharge will be less than significant because the Project "will develop significantly more impervious area than currently exists onsite."*

Response: As stated previously, approximately 80% of the proposed Project site is already developed as part of the YRC Freight buildings. In addition, although impervious surfaces would slightly increase on the Project site, all stormwater would be directed to the existing infiltration basins located on the south side of the YRC Freight site near Locust Avenue and the infiltration basin located near Linden Avenue.

Claim: *The Commenter claims "Two detention basins presently exist onsite including one just west of center on the south side of the site, and one in the southeastern corner."*

Response: These areas are not detention basins. They are undeveloped areas currently used by YRC Freight for truck and trailer parking. As stated previously, all stormwater would be directed to the existing infiltration basins located on the south side of the YRC Freight site near Locust Avenue and the infiltration basin located near Linden Avenue.

Noise

Claim: *Noise Comment 1: An EIR is needed to quantify, disclose, and mitigate the noise impacts of the Project.*

Response: The *Noise Impact Analysis* (LSA, June 2013) included in the IS/MND Appendix has quantified and disclosed potential noise impacts attributable to the Project, and has provided feasible mitigation measures that reduce the noise impacts to a less than significant level. In this case, an EIR is not needed because all noise impacts have been determined to have no impact or a less than significant impact without the need for mitigation, or are rendered a less than significant impact with mitigation.

Claim: *Noise Comment 2: The IS/MND does not disclose noise standards.*

Response: Pages 12-15 of the *Noise Impact Analysis* (LSA, June 2013) included in the IS/MND Appendix clearly provides a discussion of the following applicable noise standards from the Noise Element of the County General Plan: interior/exterior noise level standards (see Table F, *Noise Impact Analysis*); maximum exterior noise limits (see Table G, *Noise Impact Analysis*); and policies associated with noise attenuation from construction design requirements. In addition, pages 15-16 of the *Noise Impact Analysis* includes a discussion the following standards from the County of San Bernardino 2007 Development Code: noise standards for stationary noise sources (see Table H, *Noise Impact Analysis*); maximum exterior noise limits; construction hours; and noise standards for other structures.

Claim: *Noise Comment 3: The Noise Study used varying measures.*

Response: To properly evaluate potential noise impacts, each noise source is assessed against the proper noise standards designed and adopted by the County for such source or activity. Four noise measurements are used in the Noise Study. First, construction noise levels from worker vehicles, material and equipment deliveries, and site grading activities are measured in terms of maximum noise levels, or dBA L_{max} . Second, operational noise levels from stationary sources such as on-site truck maneuvering, rooftop mechanical equipment, and parking lot noises are measured in terms of a combination of maximum noise levels - dBA L_{max} and percentile exceedance levels (L_n). The dBA L_{max} is used in these instances because it measures the peak, or instantaneous, noise levels associated with noise generated from these sources or activities. The L_n noise standard is used for peak stationary noise sources that last longer than instantaneous noise sources and represents the percent of an hour that the given noise level is exceeded. Third, roadway noise impacts are measured in terms of community noise equivalent level, or CNEL, or Day-Night Average Level, L_{dn} . CNEL is an averaged noise level over a 24-hour period, with a 5 dBA penalty factor applied to noises occurring between 7:00 p.m. and 10:00 p.m. and a 10 dBA penalty factor applied to noise occurring between 10:00 p.m. and 7:00 a.m. L_{dn} is similar to the CNEL scale, but without the evening adjustment. CNEL and/or L_{dn} are used to measure roadway noise because noises generated by roadway traffic are fairly steady. Fourth, noise levels in terms of dBA L_{eq} represent an average of the fluctuating noise levels over a period of time. The County uses this noise scale to regulate certain stationary noise sources such as mechanical HVAC equipment that are best evaluated over a period of time with an average noise level rather than based on a fluctuating noise level or a level that should not be exceeded for more than a certain period of time.

For example, construction noise typically occurs intermittently and during daytime hours only, since the County limits construction activities to between the hours of 7:00 a.m. and 7:00 p.m., Monday through Saturday, and never on federal holidays. In this example, compliance with the County's permitted construction hours would reduce the construction noise impacts to less than significant. Vehicular traffic noise occurs frequently and is weighted and averaged over 24 hours, accounting for the more sensitive evening and nighttime hours. Noise associated with truck loading/unloading activity occurs intermittently and is assessed against the County's noise standards for stationary sources. In summary, noise from different noise sources or noise activities are not combined and compared to one set of noise standards. The *Noise Impact Analysis* evaluated the different noise sources and their potential impacts correctly. The following table summarizes the different noise standards and the Project's impacts for each of the noise sources evaluated in the *Noise Impact Analysis*.

Noise Source	Standard
Off-Site and On-site Roadway Noise	65 dBA CNEL for roadway segments with fronting residential and school uses 75 dBA CNEL for roadway segments with fronting industrial, office, or commercial uses
On-Site Truck Noise	55 dBA L_{eq}/L_{50}
On-Site Noise/Other Sources	55 dBA L_{eq}/L_{50}
Construction Noise	time restrictions only

Noise Source	Standard	Sig. Impact?
Construction – employee commute, equipment deliveries	Permitted during typical working hours	No
Construction – site grading	Permitted during typical working hours	No
Operational –truck maneuvering	55 L_{eq}	No (with restrictions)
Operational – rooftop mechanical	55 L_{eq}	No (with restrictions)
Operational – parking lot activity	55 L_{eq}	No (with restrictions)
Operational – off-site roadway noise	Greater than 3 dBA increase?	No (less than 2 dBA change)
Operational – off-site roadway noise	70 CNEL	No (less than 70 CNEL)

Claim: *Noise Comment 4: Construction noise exceeds noise level standard.*

Response: Please see the response to Noise Comment 3 above for the explanation of different noise scales and standards for different noise sources or activities. The Commenter misapplies the noise standards. The 85 dBA maximum noise level from construction activity represents the upper level of potential noise levels from the proposed project measured at one instant lasting less than one second, representing the maximum permissible instantaneous noise level (85 dBA_{lmax}). The County's 60 dBA CNEL is a noise level representing an averaged, weighted noise event over a 24-hour period designed for assessing impacts from transportation (i.e., roadway) sources. The 75 dBA L_{max} maximum noise level standard and other percentile exceedance levels (Ln) are designed to regulate long-term stationary noise sources. The 57.9 dBA $L_{eq, 20 min}$ is an ambient noise level measured over a 20 minute-period in a residential backyard. All of these are different from each other and are not to be compared to each other. Please also refer to the response to Comment 3 above for the construction noise and compliance issue. The *Noise Impact Analysis* adequately evaluated these different noise

sources with respect to their corresponding noise standards and provided feasible noise mitigation measures, rendering impact to a less than significant level. Commenter's claimed additional construction mitigation measures are therefore not required.

Claim: *Noise Comment 5: Operational noise will exceed nighttime standards (west side).*

Response: Comment noted. Commenter has correctly noted the mitigation measures identified in the *Noise Impact Analysis*. With implementation of the mitigation measures identified in the *Noise Study* and IS/MND, no exceedance of the nighttime noise standards of 55 L_{eq} would occur and no significant noise impacts would occur.

Claim: *Noise Comment 6: Operational noise will exceed nighttime standards (east side).*

Response: Comment noted. Commenter has correctly noted the mitigation measures identified in the *Noise Impact Analysis*. With implementation of the mitigation measures identified in the *Noise Study* and IS/MND, no exceedance of the nighttime noise standards of 55 L_{eq} would occur and no significant noise impacts would occur.

Claim: *Noise Comment 7: Operational noise will exceed nighttime standards (southeast side).*

Response: Comment noted. Commenter has correctly noted the mitigation measures identified in the *Noise Impact Analysis*. With implementation of the mitigation measures identified in the *Noise Study* and IS/MND, no exceedance of the nighttime noise standards of 55 L_{eq} would occur and no significant noise impacts would occur.

Claim: *Noise Comment 8: Commenter states that not all mitigation was incorporated.*

Response: Mitigation Measure XII-1 on Page 34 of the IS/MND clearly lists the applicable noise mitigation measures from the *Noise Impact Analysis*. Two mitigation measures were identified in the *Noise Study* to restrict the maximum number of trucks that can operate on-site for each of the two operational scenarios. Both were listed in the IS/MND, and implementation of these measures reduce impacts to less than significant.

Claim: *Noise Comment 9: Noise analysis does not address parking lot, building, other site noise sources.*

Response: As discussed in the *Noise Impact Analysis*, parking lot activity noise generated on-site would be reduced to below 55 dBA at the nearest residences, which is lower than even the most stringent County noise standard of 55 dBA L_{50} . Since parking lot activity occurs infrequently and intermittently, and it is usually much lower than the truck loading/unloading noise, it does not contribute measurably to the overall ambient noise level. Rooftop mechanical equipment, including exhaust fans and other HVAC equipment, was evaluated in the *Noise Impact Analysis*, and was found to result in noise levels of 40.5 dBA L_{eq} or lower at the nearest off-site residences. This level of noise does not contribute measurably to the ambient noise levels that are dominated by vehicular traffic in the neighborhood and truck loading/unloading noise in the loading areas. Clearly, the *Noise Impact Analysis* addresses parking lot, building, other on-site noise sources.

Claim: *Noise Comment 10: Commenter states that stationary noise impacts were not addressed.*

Response: The *Noise Impact Analysis* evaluated the proposed on-site stationary sources, such as truck loading/unloading noise and mechanical HVAC equipment noise, and compared them to the applicable County noise standards for stationary sources. Feasible mitigation measures have been identified, resulting in a reduction of the potential noise impacts to a less than significant level. Also, ambient noise levels are measured to document the existing noise environment during the time period when the ambient noise is measured. It represents the noise level in a snap shot of time, and are not be used for noise impact determination purposes.

Claim: *Noise Comment 11: Traffic noise will increase.*

Response: As described in the “Measurement of Sound” section of the *Noise Impact Analysis*, noise level changes of 3 dBA or less are generally considered to be below the threshold of noticeable hearing. The segment of Linden Avenue that would have a 2.9 dBA increase with the Project traffic would still have its 60 dBA CNEL noise contour confined to within the roadway right-of-way. Project-related traffic noise level increases would occur over a relatively long period of time (i.e., not overnight), and no significant traffic noise impacts would occur for land uses along this segment of the road even with this traffic noise level increase. For this reason, the *Noise Impact Analysis* properly concluded that a significant off-site traffic noise impact from Project-related traffic would not occur and no mitigation is required.

Claim: *Noise Comment 12: Cumulative noise not addressed.*

Response: The *Noise Impact Analysis* evaluated potential Project-related traffic noise impacts under the existing (2013) and opening year (2014) scenarios. Because Project-related traffic trips would reach the maximum level in the opening year (2014), and background traffic volumes would be the smallest in the Project opening year after the Project is fully occupied and begins operations, evaluating the opening year Project-related traffic noise impacts would be evaluating the worst case scenario. In the future, when the background traffic volumes grow with the regional development, the percentage of Project-related contribution would decrease, and Project-related traffic noise levels would decrease accordingly. As stated in the response to Comment 11 above, Project-related traffic noise increases on off-site land uses would be less than the 3 dBA threshold, and are therefore considered less than significant and no mitigation is required. Because the proposed Project itself is not considered a noise-sensitive use, future background (i.e., non-Project) traffic volume increases would have no significant effect on the on-site Project uses and would not result in any significant on-site traffic noise impacts.

Therefore, the *Noise Impact Analysis* properly concluded that a significant off-site cumulative traffic noise impact would not occur and no mitigation is required for on- or off-site land uses. Similarly, the *Noise Impact Analysis* evaluated roadway segments in the immediate Project vicinity, or those that would be most affected by Project-related traffic trips. For roadway segments further away from the Project site, the effect of Project-related traffic trips decreases and the percentage of Project-related traffic noise level changes decreases as well. Due to the large volumes of freeway traffic on I-10 and its ramps, Project-related vehicle trips would contribute a relatively small percentage of total traffic volumes to these roadway segments, and, therefore, Project-related traffic noise impacts would be small. In contrast, Project traffic volumes to those roadway segments in the Project vicinity are a higher percentage because background traffic volumes are low. For these reasons, the *Noise Impact Analysis* provides a correct assessment of potential cumulative noise impacts.

Claim: *Noise Comment 13: Additional mitigation measures are needed.*

Response: The *Noise Impact Analysis* correctly determined that the proposed Project would result in no noise impact, a less than significant noise impact, or a less than significant noise impact with mitigation. The IS/MND, in turn, correctly concludes that noise impacts are rendered less than significant with implementation of Mitigation Measures XII-1. Commenter's claimed additional mitigation measures are therefore not required because potential noise impacts are rendered less than significant with the implementation of Mitigation Measures XII-1.

Utilities and Service Systems

Claim: *The Commenter claims that the IS/MND does not provide evidence to support the claim that impacts to utilities and service systems will be less than significant.*

Response: Although this comment claims the IS/MND contains additional topics for which conclusions regarding impacts to utilities and service systems are not based on evidence, this comment fails to directly state if any additional conclusions regarding impacts to utilities and service systems are not based on evidence other than impacts to septic, solid waste, and water service.

Claim: *The Commenter again claims that there is no evidence that the septic system will be adequate to service the Project.*

Response: The Commenter is referred to the response above in the Water and Hydrology Section that addresses their concern.

Claim: *The Commenter claims that there is no evidence the Mid-Valley landfill has sufficient capacity to serve the Project.*

Response: According to CalRecycle, the Mid-Valley Sanitary Landfill is permitted to accept 7,500 tons of solid waste a day and has a maximum capacity over 101 million cubic yards.³ The landfill has over 67 million cubic yards of capacity remaining, and is not scheduled to cease operation until 2033.⁴ Because the Project site is already home to a fully operational YRC Freight operation and the proposed Project land uses are very similar to the existing uses on site, the proposed Project would negligibly increase the amount of solid waste sent to the landfill.

Claim: *The Commenter claims that the IS/MND does not provide evidence that the West Valley Water District has adequate water to serve the Project.*

Response: As stated in the IS/MND, the County has received confirmation from West Valley Water District, the water purveyor, that there is sufficient capacity in the existing water system to serve the water needs of the Project. West Valley Water District is an established water purveyor that is subject to independent regulation by local and state agencies that ensure compliance with water quality requirements. A Water Supply Assessment has been prepared by the purveyor (West Valley Water District, approved by the Board May 2013) in accordance with Senate Bill 610 and is the basis of the issuance of the "will serve" letter. As concluded in the Water Supply Assessment, "The District has verified that it has water supplies available during

³ <http://www.calrecycle.ca.gov/SWFacilities/Directory/36-AA-0055/Detail/>

⁴ *Ibid.*

normal, single-day, and multiple-dry years within a 20-year projection that will meet the projected demand associated with the proposed development...”

Cumulative

Claim: *The Commenter claims that the cumulative analysis of the proposed Project was insufficient.*

Response: The proposed Project’s traffic study analyzed cumulative impacts extensively on pages 16-23, in which traffic from two cumulative projects (Alder Slover Warehouse; Slover II Warehouse) and a two percent increase from existing traffic volumes to year 2014 traffic volumes were considered as part of the traffic analysis for the Cumulative traffic analysis scenario. The traffic study analysis determined that under cumulative conditions, all intersections are forecast to operate at a satisfactory level of service. In addition, portions of the Air Quality and Noise Studies are based on the traffic volumes contained in the traffic study. In addition, air quality studies are cumulative in nature because they examine the effects of a project on the entire Air Basin.

In regard to the other CEQA topics that could be analyzed cumulatively, the Project is consistent with the County’s General Plan. Lastly, impacts from the proposed Project and other cumulative projects are localized and do not intermingle with each other. Such localized impacts include traffic, air quality and noise which were analyzed on a Project-specific and cumulative basis.